

Jessie Richard

From: Jennifer S. Kaufman
Sent: Thursday, July 28, 2016 9:32 AM
To: Jessie Richard
Subject: FW: Ponde Place Development

Jennifer S. Kaufman, AICP
Environmental Planner
Inland Wetlands Agent
Town of Mansfield
4 South Eagleville Road
Storrs-Mansfield, CT 06268
860-429-3015x6204
860-429-9773 (fax)
KaufmanJS@MansfieldCT.org

From: Cynthia Hirschorn [mailto:chirschorn@sbcglobal.net]
Sent: Wednesday, July 27, 2016 10:47 PM
To: Jennifer S. Kaufman <KaufmanJS@MANSFIELDCT.ORG>
Subject: Ponde Place Development

Dear JS Kaufman,

As a resident of Mansfield, I am against the development of Ponde Place apartments in an area containing wetlands and vernal pools. Run off from this development will, most likely, have an adverse effect on residential wells nearby. The Town of Mansfield Planning and Zoning Board would be negligent in allowing this development.

Why is a private developer being allowed to hook-up to the University's sewer system? It is my understanding that one of the developers is a generous donor to Uconn. If this is true, there is a clear conflict of interest in allowing the sewer hook-up to go forward.

The Town of Mansfield Zoning Board and the members of the Mansfield Town Council are obligated to protect the residents of the town from undue influence by the State of CT, in particular, the University of CT. The Ponde Place development is clearly benefiting Uconn as a place for its students to live. Uconn needs to provide residences for its students or stop expanding if it cannot do so.

Sincerely,
Cynthia Hirschorn: chirschorn@sbcglobal.net
63 Davis Rd.
Storrs, CT 06268

44 W. GATE LANE
STORRS, CT. 06268
860 429-3978
July 9, 2016

Dear Inland Wetlands Agency Members,

We have lived at the above address, in the vicinity of the proposed "Storrs Lodges" Construction proposal, for the past 36 years. We are very familiar with this wetlands area and value its existence. Building on this site is not acceptable to us, especially with regard to our concerns about clean water having lived through the UConn toxic dumping site on Hunting Lodge Rd. Building on this site jeopardizes our well water as well as disturbing aquatic life therein. We believe that your committee should be protecting our natural resources and hope that you will reject the proposed building permit.

Thank you for your kind attention.

Sincerely,

Susan Zito


Michael Zito


Jessie Richard

From: Jennifer S. Kaufman
Sent: Tuesday, July 19, 2016 6:54 AM
To: Jessie Richard
Subject: Fwd: example of letter you could write

Begin forwarded message:

From: "Mendoza-Botelho, Martin (Political Science)" <mendozabotelhom@easternct.edu>
Date: July 18, 2016 at 10:16:04 PM EDT
Cc: "KaufmanJS@Mansfieldct.org" <KaufmanJS@Mansfieldct.org>
Subject: Re: example of letter you could write

Mansfield Inland Wetlands Agency
17, 2016
4 South Eagleville Road
Storrs, CT 06268

July

Dear Chairman Goodwin and Members of the Mansfield Inland Wetlands Agency,

I live at 38 Meadowood Road and purchased my home in 2014. Right after we we bought the property our basement flooded due to a malfunction of the sump pump. We need a sump pump to keep the water out of our basement and in fact have purchased two sump pumps (a permanent and a battery operated one) since buying our home.

I am very worried that should the Storrs Lodges apartment complex be built that the storm water run off from it would further saturate my property causing it to flood and water enter my basement. Moreover, I am also concerned that the new project might affect the quality of our dwell water. I am writing to ask you to please deny this permit application and protect my home and those of my neighbors who also experience problems because of the existing high water table on our properties.

Thank you for your consideration of my significant concerns regarding the proposed project.

Respectfully,

Martin Mendoza-Botelho

38 Meadowood Road
Storrs, CT 06268

Dr. Martín Mendoza-Botelho

Associate Professor

Department of Political Science, Philosophy and Geography

Eastern Connecticut State University

Editor General/General Editor

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mendozabotelhom@easternct.edu

<http://martinmendozabotelho.wordpress.com>

Jessie Richard

From: Jennifer S. Kaufman
Sent: Tuesday, July 12, 2016 8:56 AM
To: Jessie Richard
Subject: FW: Submission for the July 18th 2016 public hearing on "Storrs Lodges" application for an inland wetlands permit

For the file.

Jennifer S. Kaufman, AICP
Environmental Planner
Inland Wetlands Agent
Town of Mansfield
4 South Eagleville Road
Storrs-Mansfield, CT 06268
860-429-3015x6204
860-429-9773 (fax)
KaufmanJS@MansfieldCT.org

From: Chris Simon [mailto:chris.simon.uconn@gmail.com]
Sent: Tuesday, July 12, 2016 4:25 AM
To: Jennifer S. Kaufman <KaufmanJS@MANSFIELDCT.ORG>
Cc: Chris Simon <chris.simon@uconn.edu>; Stephen Chiswell <shrunkenminds@gmail.com>
Subject: Submission for the July 18th 2016 public hearing on "Storrs Lodges" application for an inland wetlands permit

Dear Chairman JoAnn Goodwin and Members of the Mansfield Inland Wetlands Agency,

I am a professor of Ecology and Evolutionary Biology at the University of Connecticut. I live at 17 Silver Falls Lane and Cedar Swamp Brook runs in back of my house. I have lived in Storrs for 25 years. We built our current house 12 years ago.

I am writing to oppose the development of the wetlands property on which Storrs Lodges are proposed to be built. Unfortunately, I am away conducting research and will not be able to attend the public hearings this summer.

I have taught environmental science for 30 years, first at the University of Hawaii and then at UCONN. I know from many case studies that development of this sort is unsafe for wetlands. In many instances developers promise to take care in construction and sometimes to build new wetlands to replace the wetlands they destroy. But restoration is orders of magnitude more expensive than protecting a site in the first place. As you know, wetlands provide many ecosystem services that are irreplaceable. I worry about the impact of the development and later run-off on the vernal pool and the Cedar Swamp Brook drainage. The winter salt load alone could markedly change the ecosystem.

The site obviously contains wetlands that will be severely impacted by the proposed use and development.

I urge you to deny their permit.

Sincerely,

Chris Simon
17 Silver Falls
Storrs, CT 06268

July 10, 2012
Robert and Jennie Talbot
26 Southwood Road
Storrs, CT 06268

Mansfield Inlands Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

To Whom It May Concern:

As residents of Storrs and frequent walkers on the trail through the UCONN Forrest between North Eagleville and Birch Road, we are very concerned about the proposed Storrs Lodges Apartment Complex.

We feel the proposed project is too large and close to wetlands and a vernal pool and would have a negative impact on them. These wetland and vernal pool are important natural resources for wild life and should be protected. The proposed road to Northwood Road is too close to the vernal pond and has the potential to pollute it and the wetlands.

Thank you for your consideration on this problem,

*Jennie Talbot
Robert Talbot*

Jennie Talbot
Robert Talbot

Mansfield Inlands Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

7/9/ 2016

Dear Wetlands Agency Members:

I would like to voice my opposition to the Storrs Lodges inland wetland permit application. The plans as they currently exist are not acceptable. Nearby wetlands will be decimated if this is huge complex is allowed to be built. It is obvious that even the activities around actually constructing such a big complex, let alone the hundreds of resident students, will result in adverse effects on wildlife, vernal pools, and other surrounding waters.

I am a long time resident of Storrs (and also a professor at UConn) and would like to see the quality of water in the area remain good. It is important to preserve wetlands that have such an important function in the ecosystem. The proposed apartment complex footprint is way too expansive and it is obvious to me that it simply should not be built so near the valuable wetland areas under consideration.

Please reject the Storrs Lodges inland wetland permit application.

Thank you for your consideration,



Frank Noelker
491 North Eagleville Road
Storrs, CT 06268

Mansfield Inlands Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

July 9, 2016

Dear Wetlands Agency Members:

I am writing to ask that you reject the Storrs Lodges inland wetland permit application. I am alarmed that this proposal to build a massive complex so close to fragile wetlands and a vernal pool has even the smallest chance of acceptance. I am thoroughly familiar with the intended building site and it is clear to me that the wetlands and resident wildlife will be irreparably damaged should the complex and associated roadway construction go forward.

I have taught at the University of Connecticut for 25 years, but I am writing to you as a concerned Storrs Mansfield resident. The wetlands we are discussing here are clearly an invaluable natural resource. It is undeniable that wetlands play a crucial role in protecting the quality of our water. We need to make sure these areas continue to provide valuable aquatic and wildlife habitats as well. The salt runoff from roads and storm water runoff from the building site will destroy the local environment and have an extremely negative affect on surrounding waterways.

Please reject this outrageous and foolhardy proposal!

Sincerely,

A handwritten signature in cursive script, appearing to read "Laurie Sloan".

Laurie Sloan
491 North Eagleville Road
Storrs, CT 06268

Jessie Richard

From: Jennifer S. Kaufman
Sent: Saturday, July 16, 2016 7:37 AM
To: Jessie Richard
Subject: Fwd: The Lodges at Storrs

Begin forwarded message:

From: Priscilla Douglas <priscilladouglas@earthlink.net>
Date: July 15, 2016 at 11:43:39 AM EDT
To: <kaufmanjs@mansfieldct.org>
Subject: The Lodges at Storrs
Reply-To: Priscilla Douglas <priscilladouglas@earthlink.net>

I wish to register my objection to the proposed building project called The Lodges at Storrs. While I support the expansion of the University of Connecticut, I do believe that this vast and environmentally intrusive project is detrimental to the environment and the wetlands.

Sincerely yours,

Priscilla D. Douglas
241 Wormwood Hill Road
Mansfield Center, CT 06250

July 15, 2016

To: Members of the Inland Wetlands Agency

From: Janet Jones

Re: The Lodges at Storrs

As you consider the application from the Lodges at Storrs, I ask that you review how specific and thorough the Inland Wetlands Agency's review was for the original plan for Storrs Center. I commend you for your diligence in insuring that the wetlands were responsibly protected for Storrs Center. It was a long and deliberate process, and the findings resulted in approximately 15 acres of the site plan for Storrs Center being set aside because of wetlands issues and concerns.

May I inquire if the same rigor is being applied to the wetlands application for the Lodges at Storrs?

As I understand it, the planned population of the Lodges -- 700 individuals -- will be in excess of the population -- 620 individuals -- of the Oaks at Storrs Center. With that in mind, it would seem that an extraordinary amount of due diligence by your agency must to be allocated to protect the existing vernal pools and the wetlands on the proposed site.

Respectfully submitted,

Janet Jones
49 Farrell Road
Storrs, CT 06268

Jo Ann Goodwin, Chair, Inland Wetlands Agency
Town of Mansfield
4 South Eagleville Rd.
Storrs, CT 06268

July 16, 2016

Dear Ms. Goodwin,

I am writing concerning the proposed Storrs Lodges Apartment proposal for 218 housing units on the 45+ acre site adjacent to Carriage House Apartments. Michael Klemens, wetlands biology specialist, has presented a detailed assessment of the potential negative impacts on the wetlands for this site. The size and scope of the proposed development has the potential to impact surrounding neighborhoods profoundly, and I would urge your agency to consider his findings carefully during your deliberations. Thank you.


Terry Webster
23 Southwood Rd.
Storrs, CT 06268

Mary Harper submitted this document as a resident. She is also a member of the Conservation Commission.

TO: Jennifer Kaufman
Inland Wetland Agent
Mansfield, CT

FROM: Mary G. Harper
Conservation Commission

Re: IWA Application W1564
The Lodges at Storrs (Storrs Lodges, LLC)

Date: August 12, 2016

At the July 20, 2016, meeting of the Conservation Commission, the above-referenced application was discussed briefly. The Town's third-party consultant reviewer, GEI, is expected to attend the September meeting of the Conservation Commission. Concerns were raised at the July 20, 2016 Conservation Commission meeting regarding the functionality of the proposed stormwater infiltration basins proposed for the development given the soils on the property. As agreed at the July 20, 2016 Conservation Commission meeting, questions regarding the soils and proposed infiltration basins are raised here, to be directed to GEI to address so that we can better understand the stormwater management plans proposed.

1. Soils maps on the June 10, 2016 revised plans (Sheet IW-1) are not clear defined and do not appear to match the current NRCS soils map. The NRCS depicts 33.4% (14.2 acres) of the property including, apparently, five of the ten proposed Bioretention infiltration basins (Basins 5, 6, 7, 9, and 10), as composed of (3) Ridgebury, Leicester and Whitman soils, 0-8% slopes, and extremely stony. The applicant's soil consultant report (John P. Ianni, M.S. Highland Soils LLC, to David Ziaks, F.A. Hesketh, and Associates, Inc., June 28, 2007), describes these as "wetland soils ... rang[ing] from poorly drained to very poorly drained ... formed over a compact to friable glacial till."

Approximately 9.7 acres, or 22.7%, are classified as (46B) Woodbridge fine sandy loams, 0-8% slopes, very stony. Two of the proposed basins (#3 and #4) are slated for these soils, which the 2007 soil report describes thus: "The soils of the Woodbridge series formed from a compact glacial till that gives rise to a seasonally perched high water table."

The 2007 soil report also noted that the upland soils in the project area included the Sutton series in addition to the Woodbridge series, and that "the Sutton series also have a high water table and overlay a friable and sandy glacial till. The main difference between the two soils (Sutton and Woodbridge) is the parent material or underlying glacial till."

The "final series" identified on the property in 2007 "include well drained soils of the Charlton series. These soils also overlay a friable and sandy glacial till and are deeper to the seasonal water table."

The NRCS map indentifies approximately 3.3 acres (7.7%) of the property as Canton and Charlton soils (60B) on 3-8% slopes; Bioretention Basin #8 is proposed in these soils. Canton and Charlton, 3-8% slopes, very stony soils (61B) comprise 10.5 acres (24.7%) and are proposed to house Bioretention Basins #1 and #2.

Based on the NRCS map, the remaining soils include Charlton-Chatfield complex, 3-15% slopes, very rocky (73C), Charlton-Chatfield complex, 15-45% slopes, very rocky (73E), the two soils making up only .2 acres.

In the 2007 soils report, specific mention was made of seasonal and occasional surface water flow:

An existing culvert discharges onto the property along Hunting Lodge Road. The cross culvert conveys surface water from a seasonally ponded area on the east side of the road. The surface flow was not classified as a regulated seasonal watercourse due to the lack of

a defined channel with banks. It should be noted that surface water is conveyed from the cross culvert toward the wetlands. Although this area is not classified as a regulated wetland, it should be noted as an area of occasional surface flow.

Questions for GEI:

- What is the precise delineation of the soil types across the property?
- Does the seasonal and/or occasional surface water flow onto the property, combined with the large amount of high-perched-water table soils, suggest a propensity for excessive surface runoff as well as poor surface water infiltration (because soils above the dense till becomes saturated to the surface, resulting in standing water)?
- Where the dense layer is exposed by excavation, will excess water, in high-water-table seasons, and in storms, flow out to the surface because it cannot infiltrate down fast enough?

2. GEI, in Item 3 of its June 29, 2016 memo (from Kimberly Bradley and John McGrane, GEI, to Jennifer Kaufman, IWA, June 29, 2016), noted that “The entire design is dependent on the permeability of the existing soils and ground water levels,” and that “Geotechnical borings and laboratory permeability tests, or in-place permeability tests may be needed to verify whether the infiltration systems are viable.”

In response, the applicant reported that “Additional deep test pits and permeability tests have been completed in the field” included in a report by Soil Science and Environmental Services, Inc. (SSES), dated June 6, 2016.

Questions for GEI:

- What are the SSES-related “revisions to the subsurface infiltrator designs ... incorporated or the plans revised 6/10/16”? How are they supposed to work?

3. GEI Item #4 in June 29, 2016 memo (ibid) noted that “Accurate groundwater readings should be taken to determine year-round water levels in the areas of the proposed infiltration and the BioRetention Basins. If high groundwater levels are present, *even just seasonally* (emphasis mine), then the infiltration will not function as designed.” GEI continued, indicating the basins “will not properly function if they are partially filled with groundwater. If the designed storage volume is occupied with groundwater, they will not have the capacity to store surface runoff, and may overtop the basins.” The applicant’s response was that “Additional groundwater measurements were taken in the field at each proposed bioretention basin location.” But GEI noted that

It should be clarified that direct seasonal groundwater level readings were not collected for the site; rather, field evaluation of soil mottling and redoximorphic features as indicators of seasonal high groundwater levels were used. These, along with seepage or standing water observations, were collected via the Soil Science and Environmental Services, Inc. Report included in Attachment A of the FAHA Comment Response Memorandum, in addition to the Soil Testing completed by REMA Ecological Services, LLC (on May 25, 2016, reported in 6/14/16 letter).

The results indicate that groundwater is very close to the surface (i.e., within 16 to 22 inches below ground surface for most locations). Based on these readings, it will be imperative that a functional underdrain system be installed so that the basins and infiltrator system drain completely between storms. The plans have been updated to show a conceptual underdrain at the location specified. Generally, this seems acceptable and should address the problem, however, further construction detail should be provided perhaps as a condition of approval.”

GEI’s response to the data submitted by applicants is “Generally, these lines of evidence and revisions to basin design are acceptable.”

Questions for GEI:

- Please explain how the test hole (bioretention area) data in the 6/14/16 REMA supplemental wetlands assessment soil testing is reconciled with the mapped soil types: How, for example, can the Ridgebury, Leicester, Whitman (3) soils, which are classified as extremely stony, possess a subsoil of fine sandy loam? Likewise, the Woodbridge (46B) very stony, very poorly drained soils in Bioretention Basins #3 and #4 be classified as well and moderately well drained?
- SSES's test pits were dug with an excavator (12 pits) as follows: "undisturbed soil cores ... were extracted ... from selected soil horizons ... for permeability analyses ... which were tested for saturated hydraulic conductivities using a falling head permeability test method." What is that method?
- SSES and REMA, as noted in the GEI memo, used "depths to soil mottling and/or other redoximorphic indicators of a seasonal high groundwater table along with depths to hardpan, seepage and/or standing water were recorded for each deep test pit." How can seepage and standing water be observed in summer in a moderate drought year, which follows the drought year of 2015? Please explain/interpret the variability between "depth to faint mottles" and "depth to prominent mottles" by REMA. These two mottling types appear to have marked differences in depth.
- Why is mottling used as a reliable indicator of high seasonal water tables? Although I am not a soil scientist, I do have some experience in evaluating soil profiles in my work as an archaeologist, and also direct experience relative to the formerly proposed Williams Resubdivision in Mansfield, which has soils that are strikingly similar to the Storrs Lodges property. Many soil scientists and engineers do not consider mottling to be a reliable indicator of high seasonal water tables. In the Williams Resubdivision, soil scientists determined that Ridgebury, Leicester, and Whitman (3) soils exhibited a high seasonal water table from 0 to 10 inches below the surface from fall to spring; Basins #5, #6, #7, #9 and #10 are proposed in these soils at Storrs Lodges. Woodbridge soils (46B) exhibit a seasonal high water table at an average depth of 20 inches; Basins #3 and #4 are planned in these soils. However, soil scientists and an engineer familiar with Mansfield's geology and hydrology observed in the proposed Williams Resubdivision water flow paths, eroded areas, and exposed tree roots, which indicated surface water runoff in relatively large quantities. As noted in Item #1, above, at least some seasonal surface flow was observed by soil scientist John Ianni in the Storrs Lodges project. The observations of water flow and erosion evidence in the Williams Resubdivision area prompted a closer study of soil conditions and drainage, with standpipe monitoring in the seasonal high water period. That monitoring with standpipes proved that the mottling in the Williams Resubdivision was *not* an accurate representation of high groundwater. In areas of supposed 16 to 22-inch high groundwater depth based on mottling, the actual confirmed heights were near-surface, an average of 8 inches, and within 4 inches of the ground surface or higher, for sustained periods. These levels of water would make infiltration basins nonfunctional for much of the year, and in danger of overtopping, if they are present on the Storrs Lodges property.

I would like to understand better how the groundwater and surface water behaves on the Storrs Lodges property. I wonder, perhaps, whether a project of this magnitude warrants seasonal standpipe monitoring so that the Town can be sure that the proposed basins will work as designed and not impact wetlands or watercourses. I also think that an extremely close walkover of the entire project by GEI is perhaps warranted, if not already conducted, to make and record observations of surface flow paths, eroded tree roots, wetland-favoring vegetation, and other signs of high seasonal water runoff issues, if present. During the IWA walkover on August 11, 2016, which was aborted due to thunderstorms, some erosion and tree root exposure was observed along the western mounded edge of the "intermittent" watercourse in the eastern part of the property, near proposed crossing. LiDar imagery shows wetlands and flow paths and anomalous features that should be identified in the field, however difficult to discern

in a summer and drought period. What is GEI's opinion on a detailed project-wide walkover and/or standpipe monitoring?

4. GEI Item #5 in June 29, 2016 memo (ibid). It appears that GEI is still looking for construction detail of the Bioretention Basin Spillways. Where does overflow go? And to where do the planned underdrains egress water?



State of Connecticut
House of Representatives

Representative Gregory Haddad
54th Assembly District
Mansfield

Legislative Office Building
Hartford, Connecticut 06106
860-240-8585 or 800-842-8267
Gregory.Haddad@cga.ct.gov

September 6, 2016

Ms. Jo Ann Goodwin,
Chair and Members of the Town of Mansfield Inland Wetlands Agency
Audrey P. Beck Municipal Building
4 South Eagleville Road
Mansfield, CT 06268

Dear Ms. Goodwin and Members of the Mansfield IWA,

I write to you today regarding the proposed Storrs Lodges student housing development to be located off Hunting Lodge Road.

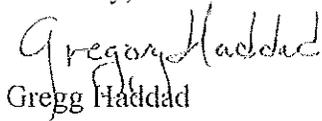
I stand with the many residents of Mansfield who are concerned about the impact this large and expansive proposed development will have on the wetlands and vernal pools that exist on the site. In particular, I think it very important for the Agency to consider and ensure that the highly technical concerns raised by the expert who represents Mansfield Environmental Trust, Michael Klemens, are addressed in full.

From my time serving on Mansfield Inland Wetland Agency, I know that this application must be looked at as a singular proposal and that you are reviewing it for consistency with regulations that protect our wetlands and watercourses, including vernal pools. In doing so, I ask you to remember that wetlands and vernal pools are a few of our most precious resources. Indeed, that is why we have extensive regulations to protect them. When evaluating this proposal and the assertions and promises of the developer, your standards must be very high. Once impacted by development, wetlands and vernal pools are often lost forever as they are highly sensitive in ways that we are only beginning to fully understand.

With 47 buildings, and 218 units intended to house 698 students, I believe the proposed development is likely to prove to be too intensive to co-exist with the existing wetlands and vernal pools. In reviewing the developer's submissions, the concerns raised by interveners and by our Conservation Commission and by IWA's independent consultants I am struck by the high number of issues of concern. In many instances, modifications to the original plan will minimize the impact of each individual identified concern. However, what remains are many small impacts that are significant when viewed cumulatively. And some significant concerns regarding the vernal pools also remain unanswered.

Again, I'd like to associate myself with the concerns, remarks and observations submitted by the interveners regarding this proposal and I urge the IWA not to approve.

Sincerely,


Gregg Haddad

Jo Ann Goodwin, Chair
Mansfield Inland Wetlands Agency
Town of Mansfield
Audrey P. Beck Municipal Building
4 South Eagleville Road
Mansfield, CT 06268

July 17, 2016

Dear Chair and members,

My name is Kip Kolesinskas. I am a consulting conservation scientist, soil scientist, and former Connecticut State Soil Scientist for USDA Natural Resources Conservation Service. I was requested by Mansfield residents to review the proposed development, Storrs Lodges, LLC. The current extensive and aggressive development proposal with substantial clearing, cutting, filling, drainage, and impervious surfaces would adversely impact the physical and chemical characteristics of the inland wetland soils, degrade habitat, and impact water quality and quantity. I offer the following comments for your consideration:

Feasible and Prudent Alternatives

It does not appear that the applicant has sufficiently explored alternatives that would have less impact on inland wetlands and watercourses. Sometimes the simplest solutions are the best. Ideas such as fewer units, or purchasing additional right-of-ways and "tear downs" from adjacent developments to meet access requirements could be explored.

Concerns about storm water management

The proposal relies on complex engineering and construction systems to compensate for the significant increase in impervious surfaces and changes to the natural soil hydrology. Soil compaction during construction, soil variability, improper design and installation, and long term maintenance are concerns to the effectiveness of the BMPs.

There are concerns about some of the basic hydrologic and soil resource assumptions used to calculate runoff and design BMPs. The Engineering and Design and Drainage Report mentions that most of the soils in the development areas are in Hydrologic Group B, and are conducive to groundwater recharge and infiltration systems. That statement is incorrect. Was this also the assumption used for runoff curve numbers and the engineering calculations? Only the Charlton soils areas of the parcel are in Group B (about 34% of the area). Areas of Paxton soils are Group C and Woodbridge soils are C/D. These soils are much less suitable to infiltration systems. USDA NRCS CT Soil interpretations for storm water infiltration systems shows the majority of the soils on the parcel have very limited potential for these systems due to a seasonal high water table, dense soil layer, and restricted permeability. The additional soils information provided by the applicant doesn't appear to adequately consider the depth to the seasonal high water table as a restriction for the proper performance of the infiltration system. The additional soils information provided for the basin design recommends subsurface drains to counteract the high water table; this helps with storage capacity but will only further disrupt the natural soil water flow that is important to maintaining the wetland and watercourse seasonal hydrology. Climate Change will increase both the amount and intensity of precipitation, has this been taken into consideration as well in the site design and engineering?

Conclusion

The development proposal would significantly change how soil water moves over and through the site. The new levels of soil saturation, combined with changes to water quality and the biological community will adversely impact the physical and chemical characteristics of the wetland soils (and thus the associate wetland and watercourse functions and values). The impacts not only affect wetlands on the parcel, headwaters wetlands like these are critical to maintaining water quality and quantity in Eagleville Brook, Cedar Swamp Brook and the Willimantic River Watershed. Eagleville Brook and to a lesser extend Cedar Swamp Brook have already been degraded by impervious surfaces and other changes in the watershed. The proposed BMPs attempt to minimize the impacts. Even if properly designed (see notes above), implemented, and maintained in perpetuity (developments have a poor track record on this) they cannot adequately replace the natural soil functions or the other effects on the biologic community. For example, roads and parking lots are well documented as killing fields for amphibians and reptiles. If the BMPs treat 80% of the runoff pollutants, is 20% further degradation of the water quality ok? I doubt the Brook Trout, or the downstream user Spring Brook Farm would think so. Feasible and prudent alternatives of less intense low impact development have not been adequately considered.

As a related issue, it also appears that further State, Region, and Town discussion around UConn growth limits and the appropriate location of high density residential housing in a sustainability/smart growth context are needed if the green infrastructure (natural resources) of the greater Storrs area is to be protected and restored.

Sincerely,

Kip Kolesinskas

Consulting Conservation Scientist and Soil Scientist

September 6, 2016

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Mansfield, CT 06268

Subject: Comments on the Storrs Lodges Inland Wetlands Application

Dear Members of the Mansfield Inland Wetland Agency;

I have reviewed the various documents pertinent to the above referenced Inland Wetland application and make the following recommendations for your consideration. As a land use planner with over forty years of experience with zoning, subdivision, inland wetland and stormwater regulations in Connecticut and throughout the Northeast, I have reviewed the proposal from a technical perspective as well as that of a former resident of Mansfield and a current resident of Ashford. The proposal is noteworthy as one of the largest developments to be proposed in Mansfield's history – at least in my recollection – and that fact alone has a significant bearing on the magnitude of the proposed development's environmental impacts as discussed below.

Alternatives Considered: The applicant has provided an alternatives analysis to demonstrate the logic behind the selection of the proposed development plan. Unfortunately, the alternatives analyzed fail to consider a development of lesser scale that would eliminate the planned impacts to on site wetland resources. The town's consultant, GEI concurs that the project should be downsized (See Letter from Kimberly Bradley and John McGrane of GEI Consultants to Jennifer Kaufman dated June 29, 2016, page 8, Response to Item #19). A developer's failure to consider feasible and prudent alternatives has been upheld by Connecticut courts as a valid reason for disapproving a development proposal with adverse impacts to inland wetlands. For this reason, without the developer's consideration of a lesser scale development, the applicant's analysis should be rejected as an insufficient justification for such a massive disturbance of this pristine wetland resource. While only 4,402 square feet of wetland are proposed to be disturbed, these figures belie the true impact that the town can expect to see. Specifically, the applicant has indicated that 1,061,927 square feet (i.e. 24.3 acres) of the site will be disturbed to create 218 units that are to contain 692 bedrooms. Given this massive disturbance, the applicant must consider a proposal that drastically reduces the scale of this project. While the applicant may not be required to demonstrate a market for the proposed housing units, it would be unconscionable of the Inland Wetland Agency to approve this application without understanding the housing needs of Mansfield and those of the

University of Connecticut students. One of the alternatives that should be considered is the development of this type of housing on state owned property managed by the University of Connecticut. While such a notion may appear unrelated to the applicant's proposal, it is central to the concerns of citizens of Mansfield and other nearby communities that will be directly or indirectly impacted by this proposal. More importantly, the applicant's proposal will have severe impacts on the functions and values of the on-site wetlands that that can't be mitigated simply by installing the best available stormwater management systems.

Stormwater Management: The applicant has prepared extensive documentation to establish hydrologic, groundwater and stormwater conditions in the post development phase that come as close as possible to pre-development conditions. Despite the applicant's extensive and cutting edge efforts to design a stormwater management system for this site, the proposal still has some significant weaknesses. Two important issues need to be understood; 1) the application proposes to reduce erosion and sedimentation impacts during construction and operation phases based on unrealistic expectations of compliance with their proposed stormwater management plan; and 2) the applicant fails to recognize the inherent limitations of controlling stormwater on site in areas that have an extremely high groundwater table. While the applicant has made improvements to the erosion and sedimentation control plans for the site and revised the stormwater bio-retention basin designs to address GEI recommendations, these improvements still fall far short of the mark. *In essence, the applicant is proposing to discharge stormwater via the bio-retention basins into the existing inland wetlands on this site. While this may serve the developer's stormwater management purposes, there is no comprehensive analysis of how this strategy will affect all of the other functions and values of on-site wetlands (i.e., water purification, wildlife habitat, nutrient removal, flood storage, sediment stabilization, groundwater discharge, etc.).*

On a technical level, without seasonal data on groundwater table elevations, the applicant is not able to demonstrate that the proposed stormwater management system will not overflow or become clogged by sedimentation during the construction or operations phases of the project. It is critical to understand that the applicant has selected a site with significant limitations for the control of stormwater using conventional retention and detention pond concepts. The only feasible way of improving the proposed stormwater management system – absent the seasonal groundwater table data recommended by GEI – is to dramatically reduce the size of this project.

Based on my experience developing and managing stormwater detention and retention systems located in numerous locations throughout the Northeastern United States I would suggest that the proposed operations and maintenance plan should be reviewed at the outset of this project before the Inland wetland Agency gives any approvals for work on this site. Indeed, since many O&M stormwater management plans are poorly implemented and improperly monitored for compliance during the construction and development phases, the applicant's promises to implement a stormwater plan are unlikely to fully protect the site's

unique natural resources – including its wetlands and vernal pool(s). It is easy to develop a best practice O&M plan but it is quite difficult to enforce it. Third party inspectors, while extremely helpful are not a substitute for adopting a more reasonable development plan that would drastically reduce the amount of the site disturbed by this proposal. The applicant intends to disturb 53% of this 45.9 acre site. That by itself should be a sufficient clue that the size of this project is a danger to the wetland resources on this site. The Inland Wetland Agency should be mindful of the damage that will be caused to wetland resources by the scale of the proposed disturbance activities including those that fall outside of the wetland boundary line but would directly impact the wetlands.

Technical Concerns: The wetland’s functions and values have been given short shrift in the documents prepared by the applicant (see REMA Wetlands Assessment – Supplemental: Functions & Values Assessment submitted to the Mansfield Inland Wetland Agency in a letter dated April 4, 2016). While the Highway Methodology Workbook submitted contains a checklist approach to describing wetland functions and values, the applicant has given limited attention to the details of this methodology. For example, in one section of the checklist the applicant indicates the site contains, or is known to contain, threatened, rare or endangered species (see page 11 of the REMA letter dated April 4, 2016) and then in another section the applicant states none of these threatened or endangered species exist (see page 15 of the REMA letter dated April 4, 2016). The applicant needs to correct and update this “checklist inconsistency” to reflect site conditions as well as reference the current database maintained by CT DEEP. The Inland Wetland Agency should be mindful that vernal pools – while a matter of particular interest to some wetland experts, are not the only intrinsically valuable resource on the proposed development site. Indeed, there are many functions and values of freshwater inland wetlands including but not limited to the protection of water quality, wildlife habitat, educational and scientific research value, groundwater recharge, etc. The applicant has completed the basic checklist review of these functions and values but has done little to describe and quantify the loss of these wetland resources and their impact on the adjoining properties and downstream water resources (e.g., the downstream impact to total suspended solids, biological oxygen demand, nitrogen levels, fecal coliform counts, heavy metals, etc. from this proposed development). The applicant has not indicated what the potential impacts of the proposed development will be on these key water quality parameters.

While the applicant has suggested an 80% standard for the reduction in total suspended solids (TSS) based on very old EPA guidance (i.e., The Results of the National Urban Runoff Program, December 1983), the Inland Wetland Agency should be aware that this very same EPA study also indicates that 90% TSS removal efficiencies are achievable with wet basin designs (i.e. see page 9-13 of the EPA NURP study). We recommend requiring a 90% removal efficiency for TSS given the best available control technology (BACT) that now exists. It worthy to note that the applicant has even inadvertently listed some of these more efficient BACT systems within his

submission on page 633 of the document titled "fulltownreport.pdf." Higher TSS removal efficiencies should be requested of the applicant in light of the extremely high quality downstream water resources that will be impacted by the proposed development. For example, one of the watersheds immediately impacted by this proposal was at one time a public water supply for the University of Connecticut and for this reason the applicant's stormwater management plan should be designed to avoid adverse TSS impacts to this high quality water resource. Protecting high quality surface water will not be achieved by applying TSS removal standards designed for urban stormwater environments where a certain amount of pollution is deemed acceptable. A more robust TSS removal standard is an important stormwater design consideration that should be given high priority for adoption at this pristine rural site.

Conclusion: Based on my review, the proposed development is too big and has proposed inappropriate stormwater pollution control standards that will not protect the high quality surface water resources directly downstream. In addition, the application includes numerous technical errors that must be fixed before it is considered acceptable to the Mansfield Inland Wetlands Agency. More importantly, because of the unprecedented size of this proposed development the Agency should not approve it without an alternatives analysis that considers a smaller development scenario for this site.

Respectfully Submitted,



Charles Vidich
40 Frontage Road
Ashford, CT 06278

Mansfield Inland Wetlands Agency
4 South Eagleville, Rd.
Storrs Mansfield, CT

July 18, 2016

Dear Members of the Agency,

I am writing in opposition to the granting of an Inland Wetlands Permit for the development 'The Lodges' on Hunting Lodge Road.

I was born in Storrs CT and currently reside on Separatist Rd in the house my parents built in 1952. While I have lived elsewhere through the intervening years I have returned to Storrs year-ly and am very familiar with the changes and growth of the town since the 1950s. While not all changes have been positive the character of the town I grew up in has remained strong.

Nationally I have seen the positive changes in how at the town, state, and federal level we have recognized the need to protect our natural heritage from threats to the environment in general and particularly to our water resources and the bio-diversity that depends on those resources. Your agency and the process we are involved in is part of that system.

I have also traveled extensively abroad and seen what can occur where uncontrolled develop-ment and overuse of natural resources happens. Six years in Jamaica, months in Vietnam and China, and extensive travel in Europe and the UAE make me aware of what happens when communities get it wrong.

After looking over the documents and opinions presented on the property under consideration I believe it would be a grave mistake to grant an Inland Wetlands Permit for this development as currently designed. The potential damage to the vernal pool(s), to their immediate vicinity, and to already compromised watercourses in the area could not be mitigated after the fact, and would negatively impact the whole community.

I am aware of the needs for communities to grow and evolve, and I learned from my own family the importance of both development and conservation. My parents, and the original developers of Dunham Pond, joined together to purchase land formerly known as the 'Foley Farm' on South

Eagleville Road from a developer who had planned a large scale development of those 99 acres. They later resold that land after first gifting to Joshua's Trust approximately 20% of the property for conservation - an 18 acre set-back from Dunham Pond - to protect it and its outflow from degradation. Because of this, and the care exercised in the original development of the Dunham Pond property, the Dunham Pond Brook to the best of my knowledge is the only Mansfield tributary to the Willimantic River that is not compromised in any of its segments, in contrast to the impaired Eagleville Brook and a segment of the Cedar Swamp Brook. The majority of the rest of the property is now the location of the Mansfield Housing Authority, Mansfield Retirement Community, Mansfield Rehabilitation, and related developments, a huge boon to the community that has not adversely affected the Dunham Pond watershed, because of their foresight and conservation effort. My parents additionally made a gift to Joshua's Trust of 80+% of their own original plot of land now known as Owens Mere (pond between Separatist Rd and South Eagleville Rd.) They understood and passed on to me the importance of preserving our most precious resource, water. A community that disregards its water will not thrive.

In the last year, I myself purchased adjoining property to my own which contains significant wetland and abuts on additional wetland. My purpose was to preventing any additional development, and to preserve its current state. These wetlands feed into the outflow from Owens Mere and are a significant breeding ground for aquatic life.

In addition to concerns raised by others, I see issues related to the substantial vehicular traffic connected with nearly 700 new residents on the property itself and on both Hunting Lodge Rd and North Eagleville Rd as follows:

1. Upgrades to the road surfaces of what are currently country lanes will be required, resulting in increased hard surface runoff and additional stresses on already compromised nearby watercourses and surface water. The additional salting, and vehicular fluids added to that runoff will be substantial.
2. The degradation of air quality from idling vehicles at the intersections of the property accesses and Hunting Lodge Road, and at the intersection of Hunting Lodge Rd. and North Eagleville Rd. will be substantial.
3. The light pollution from those vehicles, streetlights, and the buildings themselves will also be substantial and will impact the fauna on the property (an area of scientific research that is only beginning to be explored.).

It should be noted that the above vehicular impact will be felt not just on wetlands and the related downstream watercourses of the property, but on other wetlands and watercourses on the further egress bottle neck points (Hunting Lodge Extension/Separatist Rd. South Eagleville/ Separatist Rd. North Eagleville/Rte 32, North Eagleville/Rte.195, etc.)

The potential damage to our community represented by the proposed permit is too great. The laws enacted to require permitting are on the books specifically for these reasons, and to grant a permit would be in my opinion cavalier. It would be an abnegation of the personal responsibilities to the citizens of both this town and this state that you assumed when you agreed to serve as members of this Agency. I urge you to turn down this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W. Owen", with a long horizontal flourish extending to the right.

Charles W. Owen
26 Separatist Rd.
Storrs, CT

Attachment: Sections 22A-36 and 22A-42 Inland Wetlands And Watercourses Act

The following is not a complete version of the noted statutory sections. This copy does not include the effective dates, histories and annotations. Complete statutory language can be obtained at the following website: <http://www.cga.ct.gov/current/pub/titles.htm>

GENERAL STATUTES OF CONNECTICUT

Revised to January 1, 2013

(Prepared under the direction of the Legislative Commissioners' Office)

VOLUME 8

TITLE 22a ENVIRONMENTAL PROTECTION

CHAPTER 440 WETLANDS AND WATERCOURSES

SECTIONS 22A-36 and 22A-42 INLAND WETLANDS AND WATERCOURSES ACT

Sec. 22a-36. Inland wetlands and watercourses. Legislative finding. The inland wetlands and watercourses of the state of Connecticut are an indispensable and irreplaceable but fragile natural resource with which the citizens of the state have been endowed. The wetlands and watercourses are an interrelated web of nature essential to an adequate supply of surface and underground water; to hydrological stability and control of flooding and erosion; to the recharging and purification of groundwater; and to the existence of many forms of animal, aquatic and plant life. Many inland wetlands and watercourses have been destroyed or are in danger of destruction because of unregulated use by reason of the deposition, filling or removal of material, the diversion or obstruction of water flow, the erection of structures and other uses, all of which have despoiled, polluted and eliminated wetlands and watercourses. Such unregulated activity has had, and will continue to have, a significant, adverse impact on the environment and ecology of the state of Connecticut and has and will continue to imperil the quality of the environment thus adversely affecting the ecological, scenic, historic and recreational values and benefits of the state for its citizens now and forever more. The preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the state. It is, therefore, the purpose of sections 22a-36 to 22a-45, inclusive, to protect the citizens of the state by making provisions for the protection, preservation, maintenance and use of the inland wetlands and watercourses by minimizing their disturbance and pollution; maintaining and improving water quality in accordance with the highest standards set by federal, state or local authority; preventing damage from erosion, turbidity or siltation; preventing loss of fish and other beneficial aquatic organisms, wildlife and vegetation and the destruction of the natural habitats thereof; deterring and inhibiting the danger of flood and pollution; protecting the quality of wetlands and watercourses for their conservation, economic, aesthetic, recreational and other public and private uses and values; and protecting the state's potable fresh water supplies from the dangers of drought, overdraft, pollution, misuse and mismanagement by providing an orderly process to balance the need for the economic growth of the state and the use of its land with the need to protect its environment and ecology in order to forever guarantee to the people of the state, the safety of such natural resources for their benefit and enjoyment and for the benefit and enjoyment of generations yet unborn.

Sec. 22a-42. Municipal regulation of wetlands and watercourses. Action by commissioner. (a) To carry out and effectuate the purposes and policies of sections 22a-36 to 22a-45a, inclusive, it is hereby declared to be the public policy of the state to require municipal regulation of activities affecting the wetlands and watercourses within the territorial limits of the various municipalities or districts.

(b) Any municipality may acquire wetlands and watercourses within its territorial limits by gift or purchase, in fee or lesser interest including, but not limited to, lease, easement or covenant, subject to such reservations and exceptions as it deems advisable.

(c) On or before July 1, 1988, each municipality shall establish an inland wetlands agency or authorize an existing board or commission to carry out the provisions of sections 22a-36 to 22a-45, inclusive. Each municipality, acting through its legislative body, may authorize any board or commission, as may be by law authorized to act, or may establish a new board or commission to promulgate such regulations, in conformity with the regulations adopted by the commissioner pursuant to section 22a-39, as are necessary to protect the wetlands and watercourses within its territorial limits. The ordinance establishing the new board or commission shall determine the number of members and alternate members, the length of their terms, the method of selection and removal and the manner for filling vacancies in the new board or commission. No member or alternate member of such board or commission shall participate in the hearing or decision of such board or commission of which he is a member upon any matter in which he is directly or indirectly interested in a personal or financial sense. In the event of such disqualification, such fact shall be entered on the records of such board or commission and replacement shall be made from alternate members of an alternate to act as a member of such commission in the hearing and determination of the particular matter or matters in which the disqualification arose. For the purposes of this section, the board or commission authorized by the municipality or district, as the case may be, shall serve as the sole agent for the licensing of regulated activities.

(d) At least one member of the inland wetlands agency or staff of the agency shall be a person who has completed the comprehensive training program developed by the commissioner pursuant to section 22a-39. Failure to have a member of the agency or staff with training shall not affect the validity of any action of the agency. The commissioner shall annually make such program available to one person from each town without cost to that person or the town. Each inland wetlands agency shall hold a meeting at least once annually at which information is presented to the members of the agency which summarizes the provisions of the training program. The commissioner shall develop such information in consultation with interested persons affected by the regulation of inland wetlands and shall provide for distribution of video presentations and related written materials which convey such information to inland wetlands agencies. In addition to such materials, the commissioner, in consultation with such persons, shall prepare materials which provide guidance to municipalities in carrying out the provisions of subsection (f) of section 22a-42a.

(e) Any municipality, pursuant to ordinance, may act through the board or commission authorized in subsection (c) of this section to join with any other municipalities in the formation of a district for the regulation of activities affecting the wetlands and watercourses within such district. Any city or borough may delegate its authority to regulate inland wetlands under this section to the town in which it is located.

(f) Municipal or district ordinances or regulations may embody any regulations promulgated hereunder, in whole or in part, or may consist of other ordinances or regulations in conformity with regulations promulgated hereunder. Any ordinances or regulations shall be for the purpose of effectuating the purposes of sections 22a-36 to 22a-45, inclusive, and, a municipality or district, in acting upon ordinances and regulations shall incorporate the factors set forth in section 22a-41.

(g) Nothing contained in this section shall be construed to limit the existing authority of a municipality or any boards or commissions of the municipality, provided the commissioner shall retain authority to act on any application filed with said commissioner prior to the establishment or designation of an inland wetlands agency by a municipality.

MANSFIELD NEIGHBORHOOD PRESERVATION

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

Dear Chairman Jo Ann Goodwin and Members of the Inland Wetlands Agency,

I am one of the leaders of the *Mansfield Neighborhood Preservation Group*. I am here this evening to ask that you please deny the wetlands permit application recently submitted by Storrs Lodges LLC for their proposed development on Hunting Lodge Road.

The area of the proposed development is a valuable wetlands system, including vernal pools, which are damaged by construction and operation. These are not just "swamps", they are breeding grounds for small amphibians and habitat for birds and animals. The wetlands provide a natural filtering system to clean our water; they are a valuable part of our ecosystem. Additionally, neighboring homes with an already high water table are likely to suffer increased water problems on their property due to storm water run-off from the proposed project. There will also likely be issues with salt run-off in the winter. This is particularly important because a stream with "A" grade water flows through the proposed development site's wetlands and drains into the Eagleville Brook which is currently in recovery. It is therefore critical that the "A" quality water be maintained for its own ecological value, as well as, to promote the continued recovery of the impaired Eagleville Brook. With **692 students**, their friends, and **hundreds of vehicles** it is likely the water and wetlands will be harmed, no matter how well-intentioned the developers are. Uber-type taxis dropping off and picking up friends of this number of tenants will further add to the vehicular traffic. When our wetlands are destroyed, our water filtering system is also destroyed.

UConn students should be housed on UConn's own campus and not in this neighborhood where construction of a large complex with more than **47 buildings** (more than double the number at Carriage House Apartments) will add to an already over-burdened area.

The fully-funded South Campus Honors dorm for 650 students, should be put back on the schedule in lieu of the proposed Storrs Lodges venture. The Honors dorm would occupy only 210,000 square feet in contrast to deforesting much of **47 wooded acres** containing wetlands.

The Pink Ravine Reservoir just west of the proposed site was once so pure it was drinking water for UConn and the Mansfield State Training School. Every effort should be made to control land use in the Cedar Swamp Brook watershed so as to protect and enhance its water quality. I ask the IWA to protect our environment, per the statute attached, and help make the Pink Ravine Reservoir pure again. Please act to protect the important wetlands on the site of the proposed Storrs Lodges development which comprises land in **two watersheds** as noted above. A similar effort should be made to ensure the continued recovery of the Eagleville Brook.

Thank you for this opportunity to comment.

Respectfully,
Becki Shafer
45 Echo Road
Mansfield Center, CT



7/18/2016

MANSFIELD NEIGHBORHOOD PRESERVATION

GENERAL STATUTES OF CONNECTICUT *Revised to January 1, 2013*
(Prepared under the direction of the Legislative Commissioners' Office)

VOLUME 8
TITLE 22a
ENVIRONMENTAL PROTECTION
CHAPTER 440
WETLANDS AND WATERCOURSES
SECTIONS 22A-36 THROUGH 22A-45
INLAND WETLANDS AND WATERCOURSES ACT 2

Sec. 22a-36. Inland wetlands and watercourses. Legislative finding. The inland wetlands and watercourses of the state of Connecticut are an indispensable and irreplaceable but fragile natural resource with which the citizens of the state have been endowed. The wetlands and watercourses are an interrelated web of nature essential to an adequate supply of surface and underground water; to hydrological stability and control of flooding and erosion; to the recharging and purification of groundwater; and to the existence of many forms of animal, aquatic and plant life. Many inland wetlands and watercourses have been destroyed or are in danger of destruction because of unregulated use by reason of the deposition, filling or removal of material, the diversion or obstruction of water flow, the erection of structures and other uses, all of which have despoiled, polluted and eliminated wetlands and watercourses. Such unregulated activity has had, and will continue to have, a significant, adverse impact on the environment and ecology of the state of Connecticut and has and will continue to imperil the quality of the environment thus adversely affecting the ecological, scenic, historic and recreational values and benefits of the state for its citizens now and forever more. The preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the state. It is, therefore, the purpose of sections 22a-36 to 22a-45, inclusive, to protect the citizens of the state by making provisions for the protection, preservation, maintenance and use of the inland wetlands and watercourses by minimizing their disturbance and pollution; maintaining and improving water quality in accordance with the highest standards set by federal, state or local authority; preventing damage from erosion, turbidity or siltation; preventing loss of fish and other beneficial aquatic organisms, wildlife and vegetation and the destruction of the natural habitats thereof; deterring and inhibiting the danger of flood and pollution; protecting the quality of wetlands and watercourses for their conservation, economic, aesthetic, recreational and other public and private uses and values; and protecting the state's potable fresh water supplies from the dangers of drought, overdraft, pollution, misuse and mismanagement by providing an orderly process to balance the need for the economic growth of the state and the use of its land with the need to protect its environment and ecology in order to forever guarantee to the people of the state, the safety of such natural resources for their benefit and enjoyment and for the benefit and enjoyment of generations yet unborn.

July 18, 2016

Mansfield Inlands Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

Dear Inland Wetlands Agency Members,

Thank you for your service to our community. We are writing this letter to address our concerns over the Storrs Lodges apartment complex. We are strongly against this project and ask that you deny this permit.

We are the fourth and fifth generation living on our property. The first two generations of our family raised cattle on the property and we are planning on similarly raising livestock in the future. The Nelson Brook flows through our property as well as parts of Cedar Swamp Brook. We are particularly concerned about the impact this development will have on the wetlands and the vernal pool located at and around the building site which drains to Cedar Swamp Brook and how it will then secondarily impact our property. We have already seen damage to the brooks through the generations.

We are aware that this project has been proposed as a 218-unit development with close to 700 potential residents. In our opinion,

1. this development is too large for the proposed site
2. the storm water run-off from this development will adversely affect the Cedar Brook Swamp and consequently, our property
3. the developers are planning buildings and grounds too close to the wetlands and the vernal pool with not enough buffer to protect them
4. a larger separation is needed between any high density development and wetlands; there are already too many large developments near this property

Our concerns are that this development will negatively impact the wetlands which will eventually impact our property and our ability to maximize its use in the future.

Wetlands and vernal pools are important natural resources and Mansfield should continue to protect them. Please deny this permit in order to protect the wetlands, the future of our property and those around us.

Sincerely,



Lieutenant John Slyman and Patricia Slyman
Double G Farm
227 Birch Road

July 18, 2016

Mansfield Inland and Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

Dear Chairman Goodwin and Members of the Inland Wetlands Agency,

I write to ask you to please deny the wetlands permit application made by Storrs Lodges LLC.

My home sits across from the Green farm on the west, and the UCONN forest that surrounds Pink Ravine to the north. I know the woods and wetlands in this area well. I regularly fish in the pond on Bone Mill Road. The Storrs Lodges property on the east side of the Pink Ravine sits in two important watersheds; the Cedar Swamp Brook and the Eagleville Brook. Both warrant thoughtful protection.

As we in the neighborhood know, the pond at Bone Mill Road was once a drinking water reservoir. The water resources in the Pink Ravine were considered so valuable that the state took over the property by eminent domain. The Storrs Lodges site sits directly to the east of this property and is home to important vernal pools and the functioning wetlands that are part of this greater eco-system. The Eagleville Brook already suffers from too much impervious surface in its watershed and the Cedar Swamp Brook will be the next impaired waterway unless this town proactively acts to protect it.

A bridge, two roads, 692 students, their cars and guests, forty seven apartments, and a community center do not belong in those 45 acres which are home to two vernal pools, an intact and highly efficient wetlands system, and a Class A water course -- one of the few in this area. This would be overstuffing the property and exhausting it to the demise of the wetlands' wildlife, water quality, as well as to the detriment of the neighbors whose property it abuts and would likely be flooded by its storm water runoff.

Furthermore the Green family farm livestock drink the water from the Cedar Swamp Brook. The path in the woods west of Northwood Apartments begins at North Eagleville Road and ends at Shelter Falls. This path travels north to south below, and west of, the Storrs Lodges LLC property. I walk this path and see the watercourse that streams westerly down the steep slope from the Storrs Lodges property and flows into the Cedar Swamp Brook. The proposed Storrs Lodges development storm water run off will negatively impact the water quality of the small westerly flowing streams and subsequently degrade the Cedar Swamp

Brook into which they drain. I do not want the fishing in the Bone Mill Pond destroyed by storm water pollution from Storrs Lodges. The pond at Bone Mill, created by the damming of the Cedar Swamp Brook northwest of the Storrs Lodges site, is home to both native brown trout and state-stocked trout. My dog swims in that pond and drinks there regularly too. The woods in this area are full of amphibians and birds including beautiful herons, egrets and ducks. Turtles and snakes abound in and around the pond and woods. The din of the frogs and peepers is impressive.

Please deny this permit and protect our local eco-system and wetlands. Enough of our natural resources have been disturbed or destroyed in northwest Mansfield. Please consider the value of the wetlands system on the Storrs Lodges property as well as its contribution to the health of the Pink Ravine, Meadowood, UCONN forest, and Northwood area wetlands and surface water systems. The university should provide housing for its students on its own campus and not place this burden on the bordering residential areas and our remaining healthy but fragile wetlands. Please act to protect the integrity and ecological balance in these irreplaceable water and wildlife systems that we are so fortunate to be able to enjoy and learn from in Mansfield. Thank you for your service to our town.

Sincerely,



Barbara Hurd
329 N. Eagleville Road
Storrs Mansfield, CT 06268

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

July 16, 2016

Dear Chairman Jo Ann Goodwin and Members of the Mansfield Inland Wetlands Agency:

We lived at 50 Meadowood Rd for nearly 19 years; from August 1997 until June 2016. Our former property at 50 Meadowood Road abuts the proposed Storrs Lodges property. In a typical year, with normal rainfall, there was standing water on either side of our property extending to the Miller's home at 54 Meadowood (to the southwest) and between the Miller's and the Usher's at 44 Meadowood (to the east) as well as along the edges of our back yard/ northern boundary of the property. During wet springs, the standing water would be up to one foot deep.

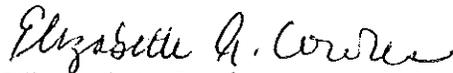
Due to the poor drainage and the high water table along Meadowood Road, the amount of standing water and the risk of property flooding will increase if the developer is permitted to build behind Meadowood Road to the north. Given the large size of the proposed development, there is guaranteed to be impact from surface run-off on neighboring properties and on the tributary to Eagleville Brook. The road and homes are lower than the proposed construction site, meaning that the development will only exacerbate the flooding problems.

During large rain events, the water level rises by the northwest corner of 50 Meadowood to such an extent that a small stream forms and flows through the middle of the back yard, parallel to the back part of the loop of Meadowood Rd. We regraded part of the yard to prevent further complications. On two occasions, the water rose high enough to enter the lower level of our house; this was eliminated by repairing the drainage system at great expense.

The middle of the Meadowood loop and areas near North Eagleville Rd. contain vernal pools, populated by several species of frogs/spring peepers. In a normal year, these areas

stay moist to wet. This year is unusually dry so they have dried out more than usual. It would be a dreadful mistake to build such a large, expansive development on the Storrs Lodges site without recognizing the great potential of ecological damage in this area, and economic damage to those who live next door.

Due to our frustration with the town and with Planning and Zoning for continuing to zone for high density development behind us -- in spite of our testimony and letters asking for the density to be lowered -- and because of the recent threat of the Storrs Lodges development, we decided to sell our wonderful home this spring and move away from Mansfield. It has been absolutely clear to us for years, due to its sensitive ecological nature and its high water table, that the parcel under consideration for Storrs Lodges construction never should have been zoned for high density development. It is inhabited by wood turtles, a species of concern in Connecticut. Perhaps a better use for the site would be to maintain it as a turtle preserve and a buffer between existing problematic student housing and residential neighborhoods. We enjoyed living in Storrs, and miss our fantastic neighbors and the town.


Elizabeth A. Cowles


Richard S. Cowles

73 Barber Hill Rd.
Broad Brook, CT 06016

page 1

July 16, 2016

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

Dear Members of the Inland Wetlands Commission,

Please deny the Storrs Lodges LLC application for a wetlands permit.

I live very close to the proposed development site and I know well how high the water table is in our greater neighborhood. Across from my house I see the standing water on Meadowood as it rises and falls throughout the seasons. I know the pristine little stream that runs out of the Storrs Lodges' wetlands on North Eagleville Road and contributes to the Eagleville Brook. The health of this little Class A watercourse needs to be protected to ensure the continued improvement of the Eagleville Brook. One of the goals of the new Mansfield POCD is to decrease the number of impaired waterways in our town. It is therefore important to protect this tributary to the Eagleville Brook so as to help ensure the brook's removal from the impaired waterway list. The Eastern CT Environmental Review Team (ERT) report of 2009 also noted (page 19) that allowing more intense development on the Storrs Lodges site would be in direct contradiction to the goal of limiting impervious surface in the watershed of the struggling Eagleville Brook.

I am also concerned for my neighbors on Meadowood Road and Northwood Road. Many of these homes use sump pumps to keep their basements dry, further testimony to the high water table in this area. Surely storm water run off from such a large project as Storrs Lodges LLC proposes would flood their properties. I do not think it is right to permit a project that has such a high potential to harm an existing homeowner's property.

page 2

The amphibians and other wildlife in the wetlands of the Storrs Lodges site cannot speak for themselves-they need you to protect them. I ask you to embrace your role as Mansfield's environmental stewards and reject this wetlands application.

Respectfully

A handwritten signature in cursive script that reads "Merrill Cook".

Merrill Cook
219 Separatist Rd
Storrs, Ct 06268

Subject: Environmental effects of the Lodges at Storrs

From: beverly sims (beverly_sims@sbcglobal.net)

To: kaufmanjs@mansfieldct.org;

Date: Tuesday, July 12, 2016 3:55 PM

I have resided at my home at 61 Northwood Rd. for nearly 25 years. I have always enjoyed the peace and tranquility here, a narrow dead end street surrounded by woods. Around 7 years ago, while attempting to develop Ponde Place, the Keystone developers created a road of sorts at the dead end into their property. They used this newly created "road" to access, drill and pump many "test" wells, in an attempt to find sufficient water for the 600 students who would reside at Ponde Place. As you know, their attempts failed and their plans were rejected by the state. What used to be woods, is now a path for students to use to access Carriage House Apts. parties. Students have discovered this and now trash, beer cans, and red and blue plastic cups adorn Northwood Rd. and most likely the Lodges property as well. My other concern is that this "road" is right next to the large vernal pool, probably also the recipient of this trash, etc. Students most likely perceive it as a pond.

This is potentially very harmful to the wood frogs, salamanders, and other wildlife in the vernal pool. Inebriated students are also not very careful about where they walk. Please protect this sensitive area by denying this wetlands application. Thank you.



William Okeson
61 Northwood Rd.
Storrs, Ct. 06268

July 14, 2016

Mansfield Inlands Wetlands Agency

Town of Mansfield

4 South Eagleville Road

Storrs, CT., 06268

Dear Mansfield Inland Wetland Agency Members-

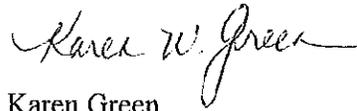
My name is Karen Green, and I reside at 1090 Stafford Road, Storrs, CT. I am writing to object to the proposed construction of "Storrs Lodges" and respectfully request that the Mansfield Inland Wetland Agency deny the application for this project.

My farm, owned and operated by the same family for six generations, is named Spring Brook Farm. The "Brook" that our farm is named after is the Cedar Swamp Brook, which traverses our farm for approximately three quarters of a mile before it empties into the Willimantic River. Year round, the Cedar Swamp Brook supplies our livestock with daily drinking water, and is crucial to the overall quality of life on this farm. The intensity of the proposed construction at the top of a watershed area where wetlands are the most sensitive, and the injection of approximately 700 careless students into this area will undoubtedly have a detrimental impact on the water quality of the Cedar Swamp which will impact the ability for us to maintain our livelihood. Poorly managed storm water discharge and snow melt from this site will transport pollutants such as grease, automotive oil, pesticides, landscape products, to name a few, to our drinking supply. Seasonal water courses drain west from the proposed development site directly into the Cedar Swamp Brook. Most likely, promises will be made to ensure that the

water quality will be maintained, but undoubtedly, poor execution of even the best laid plans, and meager oversight of such will prevail.

The Mansfield Inland Wetlands Agency is responsible for protecting the natural resources, wetlands, and vernal pools in this town, and to protect my family and farm from the harmful effects of a proposed project such as Storrs Lodges, and I implore the committee to deny this application.

Respectfully submitted,

A handwritten signature in cursive script that reads "Karen W. Green". The signature is written in black ink and is positioned above the printed name.

Karen Green

Spring Brook Farm

1090 Stafford Road

Storrs, CT., 06268

7/15/2016

Town of Mansfield
Inland Wetlands Agency
4 S. Eagleville Road
Storrs, CT 06268

Letter Regarding Storrs Lodges IWA Application

Members of Inland Wetlands Agency,

I am an abutter to the proposed Storrs Lodges student housing development and I am writing in opposition to the proposed wetland application. The proposed housing complex will result in significant degradation of the wetlands and vernal pools on the property and to the groundwater that serves the neighboring residential wells.

In particular, I am concerned that runoff from the new roadways, parking lots and hundreds of vehicles (558 parking spaces are planned) will leach into the groundwater and pose potential risks to potable wells. In a previous application to the DPUC for community wells on the property, this applicant conducted pumping tests while monitoring my well and others (see DPUC Docket #09-02-10 and #11-09-14). During pumping of the applicant's test wells, my well was drawn down by 17-18 feet. This shows just how impactful the water conditions and quality at the applicant's property are on mine and on other neighboring wells. I'm concerned that whatever leaches into the ground on the Storrs Lodges property will find its way into my family's drinking well. My well is in my front yard, less than 150 feet from the proposed buildings and parking lots. No management practices can eliminate the risks from such a huge complex.

Additionally, the water table is relatively high in the area. Shortly after moving into my home in 2000, I had to install a sump pump due to high groundwater conditions. I'm concerned that this project will exacerbate the groundwater conditions due to an increase of impermeable parking and driving surfaces and buildings.

I urge you to reject the application before you. The applicant's land happens to house sensitive wetlands and vernal pools. A massive complex of this size can only have negative impacts on those wetlands and on the neighboring properties.

Respectfully,



Jake Friedman
65 Northwood Road
Storrs, CT

Kathleen Knecht

137 Birch Road
Storrs, CT 06268

July 17, 2016

Mansfield Inlands Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

Dear Inland Wetlands Agency Members,

I am asking you to deny the application for the proposed Storrs Lodges complex.

Mansfield is a beautiful town, balancing between the benefits of a university community and the general population with its rural roots. This project is going to negatively impact the wetlands and vernal pools in the area. In a nutshell, the proposed Storrs Lodges complex is simply too large for the site and too close to vernal pools. Your agency is charged with determining the best ways to protect our wetlands and this project works in opposition to that. As you are undoubtedly aware, wetlands and vernal pools are of vital importance to our ecosystem. Wetlands perform an important function in cleaning our water. We need you as our agents, to take steps to protect this area. The Storrs Lodges project design does not have enough buffer between the proposed buildings and the wetlands and vernal pools.

As a resident who lives in the area, I am also concerned that the roadway from Hunting Lodge would directly cross wetlands. This will also cause more damage during the construction period, as wetlands would also be disturbed at that time.

A secondary issue will be the disruption to the Cedar Swamp Brook. Should the project be approved, run off from the site will end up in the brook. Cedar Swamp Brook is a resource we need you to protect as well. I suggest that you visit it at Shelter Falls Town Park if you want to see the beauty of nature in its current undisturbed state.

I urge you to deny the Storrs Lodges application in order to protect the wetlands and vernal pools in the area. Thank you for your consideration and support.

Sincerely yours,

Kathleen Knecht

August 4, 2016

Mansfield Inland Wetlands Agency
Town of Mansfield
4 South Eagleville Road
Storrs, CT 06268

Dear Committee Members,

The prospect of a development the size of the Storrs Lodges project being added to our already densely populated environment seems preposterous. In addition to its impact on the water table in the area, the additional problems from an added population of students with little-to-no regard for the community is horrifying.

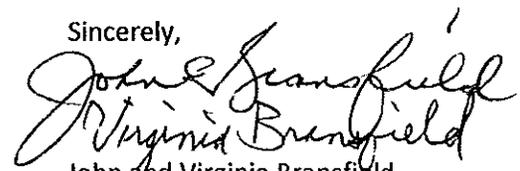
We purchased our home at 21 Meadowood Rd in July 2000. While looking at the property the first few times, one of the attractions was its large spacious basement. Strangely, though, we couldn't quite understand how empty this basement was with the previous homeowners. Not a thing in this near 1600 Sq ft basement except a potting table with a few clay pots. There was a walkout along with large windows in back. I immediately had visions of how we might make additional living area and a room for recreation for our family. Eight months later it all made sense. Once the first winter thaw began, living in the house changed. There already existed two sump pumps in the basement, but they alone proved to be futile for Meadowood Rd. The water came up in small puddles through the concrete floor and even came in to the basement through a few areas on the walls, most noticeably where the pipe and conduit lines came in from the well. I had the Well Drilling company that installed the unit come over, and they attempted to plug the holes, but leaks continued. In a phone call with company rep, I was told that they did all they could, but we lived in an area with an extremely high water table. Refusing to accept this condition, I wrote a letter to the company, to no avail. For the next few months we watched this condition continue, then had three basement contractors come to the house to appraise the situation. Finally, in June of 2001, we paid to have a complete trench system installed; jack-hammering the perimeter of the entire house along with two new super sump pumps. Even with these improvements, we have flooded twice, and each Winter to Spring since, we watch the small pond covering our backyard with our fingers crossed.

As an employee at UConn, I walk to work most of the time. I find it less stressful than dealing with the traffic coming into Storrs. Sadly, I have to walk by a number of houses on North Eagleville that are occupied by UConn students. They are easy to identify, as the trash from their property is almost always littering the yards, the recently built walking path and worse, in the brook which runs along N. Eagleville Rd. I don't know what measure the Town takes to curb the situation, but it is obvious the concern means nothing to the owners of the properties. The area between Carriage House apartments and North Eagleville is becoming a slum, inhabited by a young population that couldn't care less as they throw their empty beer cans and bottles into the brook.

When I first heard that there was a proposal in the works for a development for this Storrs Lodges complex, I thought it was going to replace Carriage House Apts. As I learned this was Storrs Lodges was to be in addition to the already decadent area of Storrs, I have to hope wise thinking prevails and we are spared further decay and abuse.

Thank you for hearing my concerns...

Sincerely,



John and Virginia Bransfield
21 Meadowood Rd.
Storrs, CT 06268

April 18, 2001

De Boer Well Drilling
62 Blacksmith Shop Rd.
Mansfield Center, CT 06250

Dear De Boer Wells,

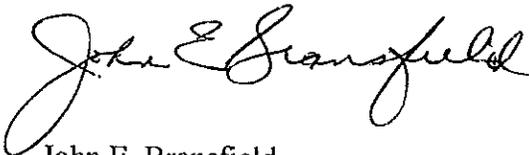
A month ago you responded to our home for an emergency. A tremendous volume of water was pouring through the conduit (full bore of the 1 1/2" pipe!) used for wiring to the tank in our basement. You arrived the morning I called, and plugged the hole with a resin type water plug. Water continued to come into the basement though, through cement surrounding the pipe. This miserable condition continues.

I was told on that day, March 20th, that your company did not run that pipe through the foundation; your company used the existing conduit, which was work done by the previous well company. For the past few weeks, I have mulled over this predicament, during points of checking amounts of water running into a large tub. I can not accept the fact that a condition exists in my basement, where conduit used for the well is installed eight months ago, and several thousand dollars, and is a huge problem. I should not have to bear this mistake.

I would like for you folks to help me with this situation. This is your trade, and the responsibility has to be in your judgement for using whatever means decided to finish a job. If the previous work and conduit was elected as a viable course to finishing a job, then so be it. The job, however, remains unfinished to any level of satisfaction.

I look forward to hearing from you soon. Thank you.

Sincerely,



John E. Bransfield
486-1403 (days) 429-1120 (evenings)

Cc: Stephen M. Bacon, Esq.
Mary Lou Bradley

CT Basement Systems, Inc.
60 Silvermine Road
Seymour, CT 06483
1-800-541-0487

INVOICE

Invoice #: 00011765
Date: 6/28/01

Bill To:

John Bransfield
21 Meadowood Road
Storrs Mansfield, CT 06268

Ship To:

John Bransfield
21 Meadowood Road
Storrs Mansfield, CT 06268

Description	Amount
Installation of full perimeter WaterGuard System including two super sumps and three repairs w/Flexispan	\$6,600.00
Internet coupon	(\$200.00)

PAID
7-30-01

Total Amount:	\$6,400.00
Amount Applied:	\$6,400.00
Balance	\$0.00

Thank you for your payment !

This zero balance invoice is the receipt for your paid-in-full installation. Please take a few moments to fill out the enclosed survey sheet and return it to us in the postage paid envelope.

Customer feedback is very important to us and we look forward to reading your comments.

We appreciate the opportunity to service your basement waterproofing needs.

41 Meadowood Road
Storrs, CT 06268
July 16, 2016

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

Dear Mansfield Inland Wetlands Agency,

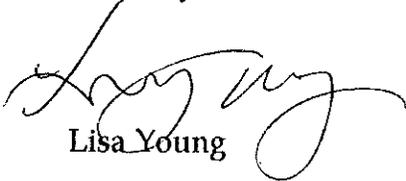
I am writing to ask you to please deny the Storrs Lodges wetlands application.

I live at 41 Meadowood Road, a property my family has owned since 1968. The water table on our property is high and our basement and garage have flooded numerous times over the years. We have standing water on the east side of our property. There is a drainage pipe in northeast corner and it is always wet there.

I am greatly concerned that if the proposed Storrs Lodges complex were to be built that the water problems on my property would be significantly exacerbated. I am worried that the proposed project will disturb wetlands and that this will cause all of Meadowood Road to flood regularly. I don't think they should be building back there period.

Thank you for this opportunity to comment.

Sincerely,



Lisa Young

July 17, 2016

Mansfield Inlands Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

Dear Agency Members,

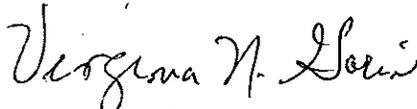
The functioning and important wetlands system on the Storrs Lodges LLC site needs to be protected from the oversized development currently proposed. This property sits in two important watersheds – the Cedar Swamp Brook and the Eagleville Brook. The wetlands on this site are important for the health of the waters in this area and particularly for the Eagleville Brook. The vernal pool west of Northwood Road is productive and valuable to the continued proliferation of the wood frogs and salamanders that lay their eggs in it. A small water course runs from this wetlands area to the Cedar Swamp Brook below. These delicate water systems and breeding ground warrant thoughtful and committed protection by you. Cars and their heat, spilled mechanical fluids, and gasoline will harm these waters and their wildlife as will the road and sidewalk salt chlorides easily permeate the skin of amphibians and invertebrates and their egg membranes as well.

The use of Northwood Road for buses is inappropriate next to a vernal pool. Likewise the bridge proposed from the Hunting Lodge Road side, with a road cut right through the wetlands where a Class A water quality stream exists, should not be approved.

It is not even clear to me that the proposed apartments themselves will not be plagued by water infiltration problems or mold, particularly since they are proposing slab construction. One has to wonder if they are choosing not to build basements because they are concerned they might fill with water, given the high water table on this property. This much construction and impervious surface also threatens the sustainability of my neighbors homes on Meadowood and Northwood where they already work hard to manage their water seepage problems.

I sincerely hope that you will act to protect our local wetlands and water systems, as well as my neighbors' homes, and deny this permit application.

Respectfully,



Virginia Gorin

222 Separatist Road
Storrs, Ct 06268

July 18, 2016

Mansfield Inlands Wetlands Agency
4 South Eagleville Road
Storrs, Ct 06268

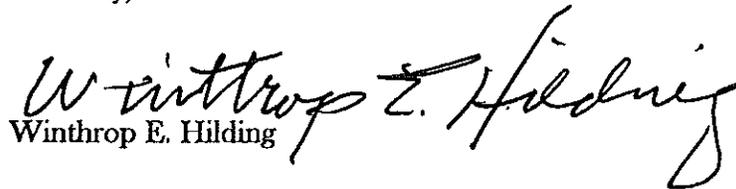
Dear Members of the Inlands Wetlands Agency,

I built my house on Southwood Road in 1954 and I have been a resident here for sixty two years. I have crisscrossed the properties in this area many times, including the property behind Northwood and Meadowood Roads. In my ninety eight years I have seen many proposals that were doomed to failure or guaranteed to ensure expensive and complicated maintenance. The proposed bridge across the wetlands of the Storrs Lodges property entering from Hunting Lodge Road belongs on that list. In a wetlands that is likely to have a soft subsurface this heavy concrete bridge seems highly unsuited. Should it fail, its repair would cause significant disruption to the wetlands surrounding it. I assume that during repair of the bridge its vehicular traffic would be rerouted to Northwood Road. 692 cars passing down Northwood Road, with head-on parking on both sides, guarantees an accident.

Please deny this application for a wetlands permit.

I am a Professor Emeritus of Mechanical Engineering at the University of Connecticut where I taught for thirty five years.

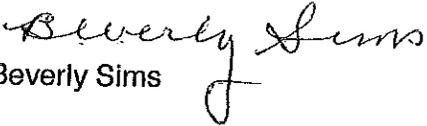
Sincerely,

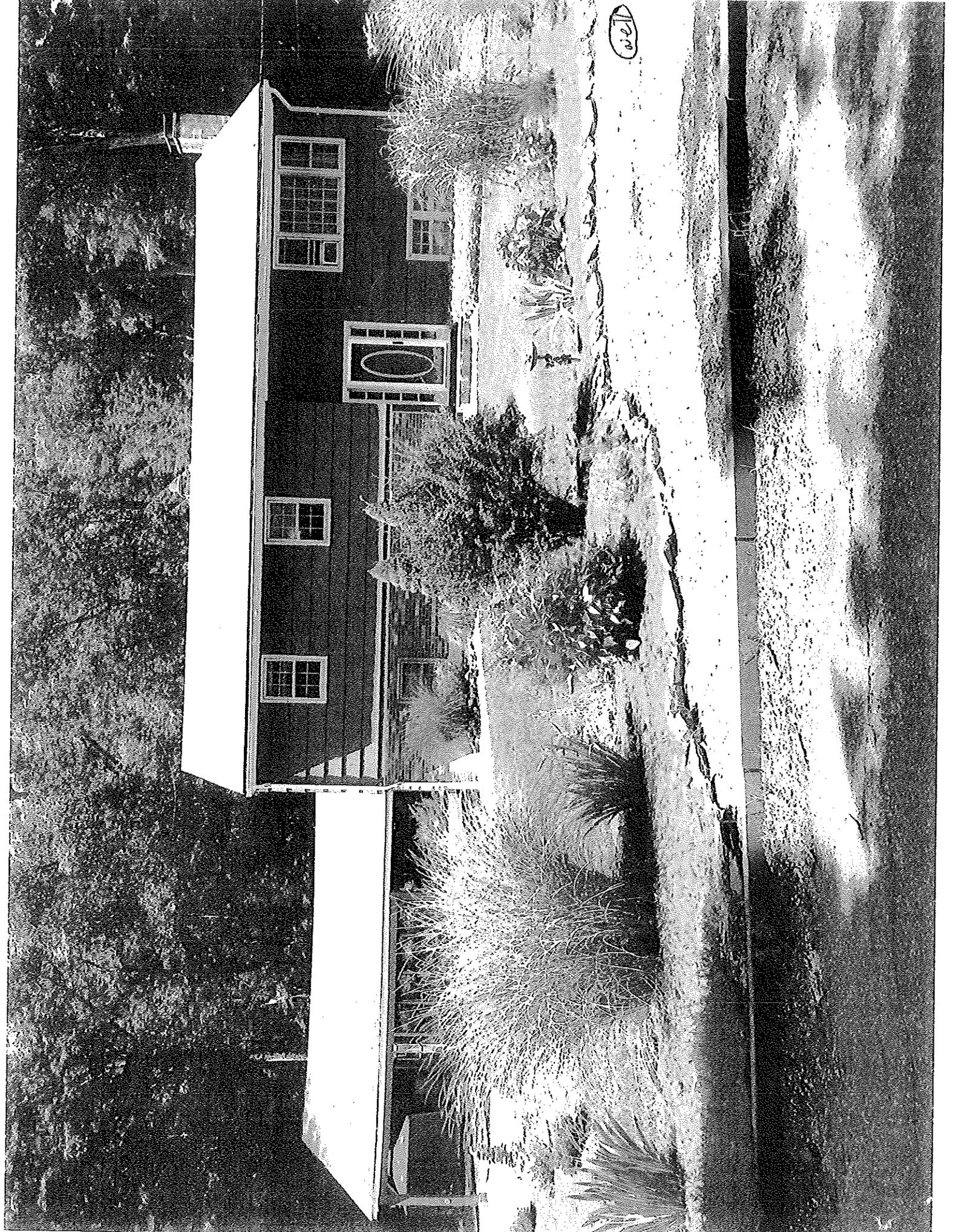

Winthrop E. Hilding

22 Southwood Road
Storrs, CT 06268

From: **Beverly Sims** beverly_sims@sbcglobal.net
Subject: **Environmental effects on my property...Storrs Lodges**
Date: **September 4, 2016 at 11:34 AM**
To: KaufmanJS@mansfieldct.org

I have resided at my home at 61 Northwood Rd. for 42 years. Due to the high groundwater table in this area, we have always employed a sump pump. We also have a dry well to divert drainage away from the house. Our property and Northwood Rd. in general is inappropriate for the infiltration of additional storm water from this proposed development. I am also concerned about the run-off from the 547 cars, as well as the salt and chemicals used for snow removal. The pervious pavement will allow pollutants etc. to go into the soil and into my well which is in my front yard directly across from a large cluster of Lodges. My water has been tested periodically and is excellent quality drinking water. After this developer drilled, fracked and pumped many wells, he was supposed to test my water but never did. I am concerned how this 18-months-2 year construction project will affect my well and quality of life. Although this project is referenced as being on Hunting Lodge Rd., the reality is, due to the abundant wetlands and the vernal pool on this property, the Lodges are clustered across from the homes on Northwood Rd., behind the back yards of Meadowood homes, and parallel to Carriage House Drive, home of Carriage House Apartments. The entrance will be on Hunting Lodge Rd. by means of a bridge over a large WETLAND. This must not happen. We need to protect our wetlands! I have also learned that the Northwood Rd. "emergency" entrance will now be a bus route. This road is right next to the vernal pool. The smoke and fumes from this bus (diesel?) will be very harmful in that area. I respectfully ask that you consider all of the above when evaluating the environmental effects of this huge project, which was deemed too large (Ponde Place) for the property, by the neutral Environmental Review Team. This project, as a whole will be harmful to the environment and is incompatible with the surrounding residential neighborhood.


Beverly Sims



211

7/17/2016
Town of Mansfield
Inland Wetlands Agency
4 S. Eagleville Road
Storrs, Ct. 06268

Letter in Response to the Storrs Lodges IWA Application

To the members of the Inland Wetlands Agency,
I have resided at 55 Northwood Road for close to 10 years. I'm writing this letter to state that we are adamantly opposed to this wetland application for the proposed development which is referred to as The Storrs Lodges.

On three separate occasions our basement flooded due to the high water table and we had to purchase a new sump pump with an alarm at the cost of over \$500.00. The proposed building of this magnitude will only exacerbate the existing problem of pooling and flooding that both of my neighbors on Northwood Road have already stated.

In particular I'm extremely concerned that my well water will be contaminated/compromised due to how close to the road my well is (see attach picture) and the proposed clusters of Lodge apartments which is shown to be directly across the street from my well. And as Mr. Freidman and Beverly Sims have stated having new roads, hundreds of cars etc., will cause a huge impact and decline on the existing vernal pools and wetlands on this property.

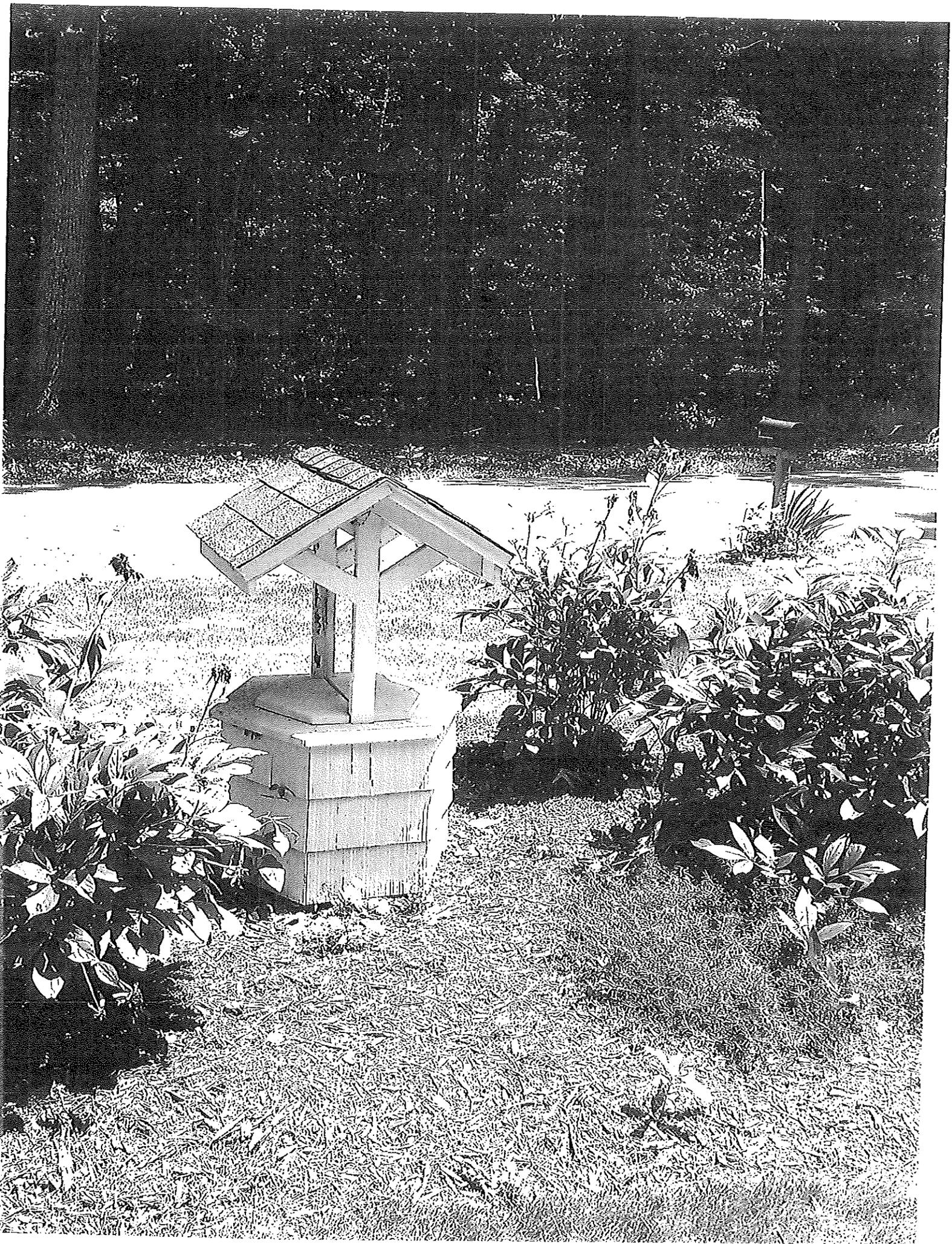
Additionally we were initially told Northwood Road would not be used, only to learn not once but twice that I'm aware of, the proposed developer has made changes and it is my understanding now that Northwood Road will be used as an access road in which UConn buses will be running directly in front of our homes. It is my understanding these two UConn purple line buses run every 22 minutes from 7:00am to midnight Monday thru Friday, as well as a weekend schedule. I am concerned that Northwood Road is shown as an "Emergency Entrance" in the applicants drawings but it is actually planned for allowing shuttle buses, car and foot traffic which will negatively impact the existing wetlands and vernal pools on the property and on the water quality in the area. As Beverly Sims stated this will have a huge negative impact on the owners of the three homes on Northwood on so many levels. Also according to the Project Summary from the applicant it states "A private operated shuttle bus will operate between the Lodges and downtown Storrs". Does this mean more buses will be utilizing Northwood Road or are they referring to the UConn shuttle buses? The route these buses will be taking runs right into where these vernal pools are located.

I won't be redundant and take up more of your time on the concerns we who live on Northwood Road have. I appreciate the opportunity to voice some of my concerns and urge you to take in consideration my concerns and all the points Beverly Sims, Bill Okeson and Jake Friedman my neighbors on Northwood Road have stated in their letters and presentation.

In closing I respectfully request that the committee reject this application.

Thank you,
Honour Mary D'Amato
55 Northwood Road





Aug 16

Dear Inland Wetlands Agency members,

This is regarding the Lodges at Storrs wetland application. Unlike the other four Apartment complexes on Hunting Lodge Rd, the Lodges at Storrs completely engulfs a large wetland. This idea is absurd, ill-conceived and should be illegal.

- The percentage of lost percolatable land, only to be replaced by impervious surfaces, will greatly alter the natural balance of the wet land. This will have a direct negative impact on the wetland, and in turn, on my property.

- Through Nonpoint Runoff, there will be pollution and excessive volumes of water introduced into this delicate environment. As it is now, THE BACK OF MY PROPERTY HAS A HIGH WATER TABLE. I can not mow this area until well into the season. WHO SHALL I SUE when this area becomes larger, or even permanent, if this project is approved? Surely, there would be no shortage of names.

- As evident at other Apartments, trash will become a constant feature of this wetland.

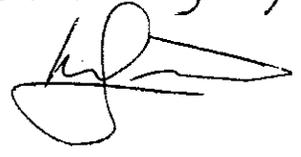
There is no reasonable argument to allow this proposal to move forward, AND I AM FIRMLY OPPOSED!

Please consider the highlighted material I've included

Thank you for your time

Please include in Public Record

Walter Hirsch
125 Hunting Lodge Rd



2 - Stormwater Problems & Impacts: Why All the Fuss?

Degraded Water Quality

Stormwater is a leading cause of water pollution.

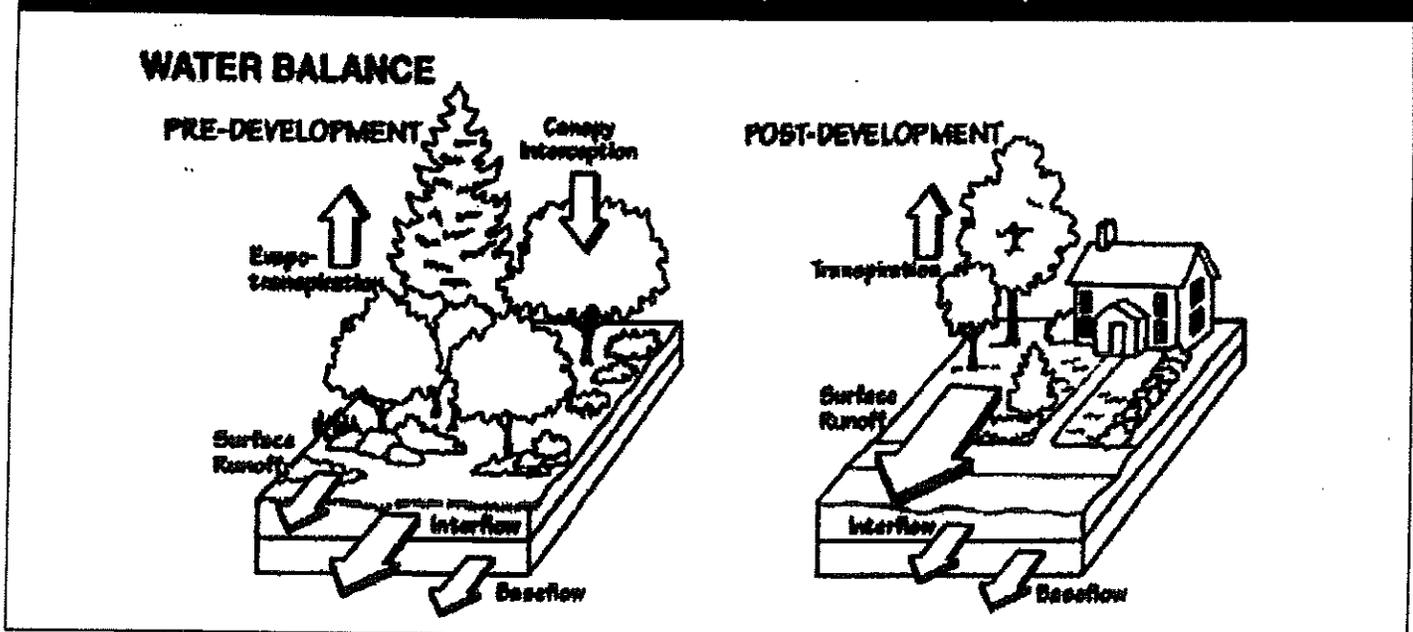
Various pollutants such as oil, fertilizer, pesticides, sediment, and chemicals are deposited on soil and impervious surfaces due to man's activities. During storms these pollutants are washed off and drain to storm drains and then directly into streams, rivers and lakes. Pollutant levels are typically much higher in the first inch of runoff, commonly referred to as the "first flush." Some studies have found that approximately 90% of the pollutant loading is contained in the "first flush" of a one-inch rainfall. Therefore, effective water quality protection requires the treatment of the "first flush" through the use of various preventive and control measures. The Center for Watershed Protection's research has demonstrated that as little as eight percent impervious coverage of a watershed can result in degradation of the water quality. At 25% impervious coverage, the waterways have lost most of their biological diversity and have significant impairments. A two acre single home lot has about 12% impervious cover and a shopping center has over 90% impervious cover.

Although low-density development reduces impervious surfaces in that area it leads to increased impervious surfaces elsewhere, because of more roads and parking that sprawling development requires. Roads and parking lots can account for more than 60% of a low-density development's impervious area. Although large lawns might seem capable of absorbing runoff from adjacent surfaces, they are typically compacted by construction equipment and can generate up to 90% as much runoff as pavement. These facts point to the importance of using the prevention and control measures discussed in Fact Sheet #4 to reduce the impact of impervious surfaces. In addition, some pollutants are dumped or discharged accidentally or illegally into storm sewer systems. Stormwater pollutants and their sources are listed in Figure 3.

Flooding

Stormwater runoff problems and impacts are most evident in areas where urbanization has occurred. Changes in land use have a major effect on both the quantity and quality of stormwater runoff. Urbanization, if not properly planned and managed, can dramatically alter the natural hydrology of an area, because it increases impervious cover. Impervious cover decreases the amount of rainwater that can naturally infiltrate into the soil, and increases the volume and rate of stormwater runoff. These changes lead to more frequent and severe flooding, and therefore potential damage to public and private property.

Figure 1: Water Balance at a Developed and Undeveloped Site





US Environmental Protection Agency

Polluted Runoff: Nonpoint Source Pollution

Nonpoint source: Urban Areas

[Overview](#)[LID](#)[Ordinances](#)[Additional Resources](#)

Urbanization increases the variety and amount of pollutants carried into our nation's waters. In urban and suburban areas, much of the land surface is covered by buildings, pavement and compacted landscapes. These surfaces do not allow rain and snow melt to soak into the ground which greatly increases the volume and velocity of stormwater runoff. In addition to these habitat-destroying impacts, pollutants from urban runoff include:

- Sediment
- Oil, grease and toxic chemicals from motor vehicles
- Pesticides and nutrients from lawns and gardens
- Viruses, bacteria and nutrients from pet waste and failing septic systems
- Road salts
- Heavy metals from roof shingles, motor vehicles and other sources
- Thermal pollution from impervious surfaces such as streets and rooftops

These pollutants can harm fish and wildlife populations, kill native vegetation, foul drinking water, and make recreational areas unsafe and unpleasant.

Storm water is a leading cause of water pollution

EPA
Home
| Privacy
and
Security
Notice
Accessibility

Last
updated
on
October
31,
2015

Joann Goodwin, Chair
Inland-Wetlands Commission
Town of Mansfield
4 South Eagleville Road
Storrs/Mansfield, CT 06268

18 July 2016

Dear Madam Chairperson and Commission Members,

As a 40 year resident of Mansfield, I am quite surprised and shocked that the town is considering allowing a development in the significant wetland and vernal pool area off of Northwood and Hunting Lodge Roads. Yet another large apartment complex in this area will impact the wetlands with the run-off from the proposed roads and parking lots, which contain salts and petroleum products. Cedar Swamp Brook does not exist in isolation – it flows into Pink Ravine which feeds into the Willimantic River (and of course, eventually into Long Island Sound). There is also the issue of the proposed construction and the long-term disruption to the environment that it will engender.

Mansfield prides itself on being environmentally responsible. You certainly demonstrated this in your willingness to consider the professional opinions of a number of experts for Storrs Downtown for responsible setbacks for wetlands and vernal pools. I sincerely hope that you will continue to act in an environmentally responsible manner.

Sincerely,



Nancy Silander
30 Silver Falls Lane
Storrs, CT 06268

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Storrs, CT 06268

July 17, 2016

Dear Members of the Inland Wetlands Agency,

I am very concerned about the proposed Storrs Lodges apartment complex. I live at 5 Southwood Road and I have water problems on my property. We use two sump pumps in our basement without which there is standing water. Likewise my neighbor to the east also uses a sump pump to keep their house from flooding. The water from my neighbors' yard to the south drains onto my property. At the northwest corner of my property, at the intersection of Southwood Road and N Eagleville Road, there is a storm water drain into which this water drains. Since the town does not maintain it routinely, the responsibility to clean this out regularly falls to me.

The property behind Northwood Apartments is wet, as well as the property on Meadowood. You can see standing water. Likewise the vacant field between Southwood and Separatist has very wet areas and a watercourse running through it. My point is that the whole neighborhood has a high water table. Adding the impervious surface of 47 apartment buildings and all of the roads and sidewalks will surely worsen this situation for neighbors as well as disrupt the natural environment in a harmful way. Massive construction in the wetlands there, which now appear to be healthy, will likely ruin them. And if the construction activities alone do not kill the aquatic life in them, hundreds of cars driving through the area will. Also, students are not respectful of property, and with a six pack or two of beer in them, will likely walk or drive right through the vernal pools and wetlands. They throw trash all around our neighborhood, including into our streams and wetlands. 692 more students?

I am particularly concerned about the volume of traffic that might travel on Northwood Road. I do not believe that it will be used for buses and emergency vehicles alone. When there is a crowd to be managed, no one is going to be thinking about the wetlands. This large proposed student apartment complex does not belong in a sensitive wetlands.

Also, this complex will be interior from the main roadways, so who will be able to see when activity on the property is compromising the wetlands or when road salt is being applied inappropriately, or when snow removal is being dumped in the wetlands?

Already the Storrs Lodges' owner has "no trespassing" signs on the property.

I strongly object to putting a road right through the large wetlands off of Hunting Lodge Road and basically cutting it in half. This will disrupt one of the few Class A watercourses in this area as well as impair the water cleaning function of that wetlands. We already have too much development and too much traffic in this area of town. The condition of the Eagleville Brook is testimony to that.

Also, the light pollution in this area is increasing. The wildlife in the wetlands of the proposed Storrs Lodges site cannot benefit from the amount of unnatural lighting that will be introduced there. I imagine that it will interrupt their life cycles.

We moved here years ago to live in Mansfield, not in UCONN. I feel like my neighborhood is being taken over with no respect or appreciation for either the wildlife or those of us who have lived here for so long. It is not right that our natural resources should be spoiled by UCONN encroachment. Let them house their students on their own main campus and responsibly manage their natural resources and not ruin those of the town, or of their own forest within the Pink Ravine, which the state took over from a local resident to make a drinking water reservoir.

Please act to protect our natural resources, and specifically the wetlands and watercourses of this neighborhood in which the proposed Storrs Lodges site is situated. I ask you to DENY this application for a permit.

Sincerely,

A handwritten signature in cursive script that reads "John Maloney". The signature is fluid and somewhat stylized, with the first and last letters being capitalized and prominent.

John Maloney

**5 Southwood Road
Storrs, CT**

To: Inland Wetlands Agency Members

From: Terry Bitwinski
16 Silver Falls Lane
Storrs, CT 06268

Re: IWA Application W1564
The Lodges at Storrs (Storrs Lodges LLC)

Date: September 6, 2016

In reference to the inland wetlands permit application from The Lodges at Storrs, I urge you to deny this permit.

The inland wetlands and watercourses of the state of Connecticut are an indispensable and irreplaceable but fragile resource with which the citizens of the state have been endowed. The wetlands and watercourses are an interrelated web of nature essential to an adequate supply of surface and underground water; to hydrological stability and control of flooding and erosion; to the recharging and purification of groundwater; and to the existence of many forms of animal, aquatic and plant life (Inland Wetlands and Watercourses Act, Section 22A-36).

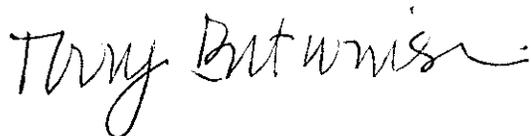
Wetlands perform an important function cleaning water and there is not enough of a buffer between the building site and the wetlands and vernal pool to protect them. It is our responsibility to safeguard this natural resource.

The proposed project is too large for the site and in close proximity to the wetlands and the vernal pool. It is likely that road salt from the proposed roadways would enter the wetlands and the vernal pool and harm or destroy aquatic and plant life.

In addition, there are concerns for the future health of the Cedar Swamp Brook that runs through Pink Ravine as a result of storm water run-off from the proposed development site.

For these reasons, the Storrs Lodges application should be rejected.

Thank you for your consideration of this request.



September 6, 2016

My name is Elizabeth Cowles; my husband Richard and I owned 50 Meadowood Rd (parcel 15.21.25) for nearly 19 years. Our house uses a well (front of house) and has a septic system (back of house).

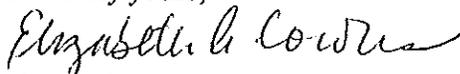
The Storrs Lodges proposal has buildings within 100 feet of the septic systems of homes abutting the parcel. During times of heavy rain, unlike the current summer, the areas surrounding the homes have standing water, indicating that the water table is above the ground. Meadowood Rd. is lower than the Storrs Lodges site; since water flows downhill, Meadowood Rd. could be severely impacted.

The Inlands Wetlands Agency needs to ask several questions.

1. How will the proposed development affect the surrounding residences?
2. Will the residences lose use of septic systems and/or wells?
3. How does the proposed development affect water flow from the capped chemical pits (UConn)?
4. Will the drainage engineering protect these homes from damage, when the infiltration basins are full?
5. Why did Mr. Ziaks of F.A. Hesketh & Associates, Inc. (letter dated August 29, 2016) mention "that there is no technical reason to conduct any additional testing or monitoring of groundwater or soil conditions on the property at this juncture?" These past two summers have been unusual in the lack of rain and the associated water runoff. It is unclear from his letter if the infiltrator systems work very well in a large wetland area, surrounded by more wetlands and in neighborhoods lacking public water and sewage.

I hope the IWA will pursue these questions with due diligence and with respect from the Northwood/Meadowood neighborhood.

Sincerely yours,



Elizabeth A. Cowles
73 Barber Hill Rd.
Broad Brook, CT 06016

May 24, 2016

We write this letter of concern to the members of the Mansfield Town Council, our town's various agencies created to protect and promote the Town of Mansfield, its citizens, businesses and environment, the developers of the proposed Lodges at Storrs, as well as our State Agencies charged with the protection of the health and well-being of our citizens and in the safeguarding of our environment.

We have lived at 44 Meadowood Road in Mansfield since 1985. We raised our children here while working our entire careers at UConn. We love our town and it has been very good to us. In 1987, our daughter had to have the left hemisphere of her brain removed due to a rare encephalitis with no known cause. Prior to the onset of this disease in 1985, she was healthy and progressing in school. This disease slowly destroyed our daughter's left hemisphere leaving her with a right sided paralysis, spinal fusion and right visual field loss in both eyes. The University of Connecticut, the Town of Mansfield, our neighbors and friends rallied around our family providing much needed community support. Meadowood Road had become a refuge for our family. Over the years, we have dealt with the UConn chemical dumping disaster and the impact this had on Meadowood Road. We coped as best we could by using bottled water and getting our well water tested on a regular basis.

More recently we are coping with the influx of businesses moving onto Meadowood Road buying former homes of elderly and retired neighbors and renting these houses to college students. Our consistently safe neighborhood has been challenged by assaults, trash, loud parties at all hours with students drinking on the roofs of their houses, increased traffic flow and underage alcohol consumption. Needless to say, our daughter is no longer permitted to take her daily walks around her neighborhood unattended. In addition, our walks on the town installed walk-way from North Eagleville Road to Hunting Lodge have been bittersweet with trash and increased traffic causing hazards. We were thrilled when the town installed these walk-ways but the increase in student housing in our neighborhoods has caused blight and hazards for us and other Mansfield citizens.

Now, we are dealing with the proposed development of the Lodges at Storrs. Yes, we've been spoiled. We look out our back door and enjoy beautiful greenery, wildlife and privacy. We feel safe in our home and secure. We know that the owners of the proposed Lodges at Storrs site have the right to build on their land. However, we are very scared of the ramifications that the magnitude of their building investment may have on our home, our safety, our lifestyle, on our community and on our environment. Our primary concerns are the effect the development may have on our drinking water,

our effluent pump septic system and leaching field, and on our water table. We are beyond frightened that the excavation, development and construction of the Lodges at Storrs will disturb the chemical pits and settlement that were caused by UConn's chemical dumps and allow our well water to be contaminated. We installed a \$16,000 drainage system around our house to prevent the high water table from seeping into our home destroying everything we owned on our lower level. We have not had a water infiltrating our home since this installation in over sixteen years. The land around our house and our neighbor's house has been consistently wet. We are downhill from the proposed Lodges at Storrs site. We hear water rushing through our backyard drain often. We fear the development, at its scope and proximity to our property, will cause our leaching fields to fail, disturb the chemical pits and increase run-off water contaminating our well and infiltrating our home due to the wetlands surrounding, and on, the land that the Lodges at Storrs will be built on. Initial development plans have the Lodges at Storrs built extremely close to our property line on top of the incline leading to our septic system's leaching field. We have consistently maintained our septic system through regular pumping every two to three years and have documentation to support this maintenance. In addition, we fear that the amount of students housed in the Lodges at Storrs will greatly impact our safety, our privacy and our quality of life. Students have walked through our yard in an attempt to access Carriage House Apartments located on Hunting Lodge

Road. We have picked up beer bottles and trash that they left behind. We are worried that the increased noise and lights coming from the Lodges at Storrs will drastically impact our quality of life. We have listened to loud music coming from Carriage House Apartments for years and now from student occupied houses in our neighborhood. We have had to use emergency services several times because of our daughter's illness and do not like to bother the police with nuisance calls. Rather, we have worked with Matt Hart, our town manager. Matt has been very helpful in helping us to resolve issues with student housing on Meadowood Road. However, these issues change with every new academic year and new student renters.

Also, like many of the residents who choose to live in Mansfield, we are concerned about our environment. Blight is growing in our beautiful town with the destruction of our neighborhoods, over-development and increased traffic. Adding over six-hundred new commuters onto Hunting Lodge Road seems completely illogical and extremely dangerous. Families with young children and school busses travel that road numerous times a day.

The developers of the Lodges at Storrs were kind enough to meet with us at a neighbor's home last January to share and discuss their plans. Mr. Giorgio, Managing Director of Ponde Place, LLC assured us that he would be willing to compromise on several aspects of the development of the Lodges at Storrs.

We are hopeful that the developers with the help of The Mansfield Town Council will come to an environmentally and ethically responsible solution to the proposed Lodges at Storrs.

In conclusion, we are asking that our beloved town protect us from the destruction of our home and property and to do due diligence in securing that our quality of life is protected. We have been good citizens of Mansfield. Our daughter loves her home and would like to remain it. Mansfield has provided a safe environment for her since 1985. Why would we expect anything less?

We are asking for a written response from our Mansfield Town Council letting us know the guarantees you will give us in the event the Lodges at Storrs are permitted to proceed with development and as a result our water table rises causing damage to our home, causing our septic system to fail and contamination of our well. Who will be responsible for our damages and hardship? Who will provide a barrier between the Lodges at Storrs and our home to prevent students from trespassing onto our property? Who is responsible to pay for any damages incurred as a result of this development?

We invite and welcome our town council and any other entity involved in this issue to visit our home and property and learn first-hand of our fears. Please let us know if you are interested.

We look forward to your response. Please know how deeply grateful we are for your concern, your due diligence and your assurances.

Sincerely,

Brian and Kathy Usher

44 Meadowood Road

Storrs/Mansfield, CT 06268

860-208-4892

Kathy.Usher@yahoo.com

Linda M. Painter

From: Linda M. Painter
Sent: Wednesday, May 25, 2016 2:28 PM
To: Kathy Usher; Paul M. Shapiro; Bonnie Ryan; DeniseKeane2009@gmail.com; Peter Kochenburger; Alexander Marcellino; Toni Moran; Virginia Raymond; Mark Sargent; Ben Shaiken; Jennifer S. Kaufman; PlanZoneDept; Matthew W. Hart
Cc: Robert L. Miller; EHHD General Info
Subject: RE: Proposed Lodges at Storrs - CONCERNS AND FEARS - RE: 44 MEADOWOOD ROAD
Attachments: Pre-Application Review Procedure-Adopted.pdf; Lodges PreApp Materials.pdf

Hi Kathy—

Thank you for sending us your concerns regarding the proposed Lodges at Storrs project. Due to the scope of this project, there will be multiple opportunities for public comment prior to any decisions being made:

Inland Wetlands Agency (IWA)

All development within 150 feet of a wetland or watercourse is required to obtain a permit from the Town's Inland Wetlands Agency. At this time, the developer has applied for a wetlands permit and a public hearing has been scheduled for Monday, June 6th at 6:30 p.m. in the Town Council Chambers. However, as the applicant is in the process of responding to comments provided by the Agency's consultant, staff is recommending that the hearing be continued to a special IWA meeting on June 20th. This means that the Agency would open the hearing on June 6th and immediately adjourn it to June 20th without any presentation or comments being taken on June 6th.

The hearing will start with a presentation from the applicant, after which the Agency will take comments from members of the public. You can also submit written comments for the Agency's consideration, either in advance or at the meeting itself. Any comments that are received by my office by the Wednesday prior to the meeting will be included in the Agency's packet; other comments will be distributed to them at the meeting. Because the focus of the application is with regard to potential impact on wetlands, comments should be focused on that issue. Written comments must be received by the Agency prior to the closure of the public hearing. Any comments received after the Agency closes the public hearing cannot be provided to or considered by the Agency.

Jennifer Kaufman is the Town's Inland Wetlands Agent; she can answer any questions you have regarding this aspect of the project as well as the public hearing process. She can be reached by phone at 860.429.3015 ext. 6204 or by email at Kaufmanjs@mansfieldct.org.

Planning and Zoning Commission

In addition to the wetlands permit, the subject site would need to be rezoned to allow for multi-family development. Any application for a multi-family zoning district must be accompanied by a special permit application for the proposed development. The special permit application will include detailed plans for the project as well as a traffic study. The Commission cannot rezone the property unless they also approve the special permit application for the specific development. Public hearings are required for both the rezoning and special permit applications; the Commission may choose to combine them into one hearing due to the related nature of the applications. The hearing process and opportunities for providing input are the same as for the Inland Wetlands Agency.

At this time, no applications for rezoning or special permit for the Lodges at Storrs project have been received by the Commission. However, the developer has submitted a request for a preapplication review with the Commission. The Commission has scheduled this discussion for Monday, June 6th. The PZC meeting starts immediately after the IWA meeting is completed. While no public comment is taken during a preapplication review, you are welcome to

attend. Commission meetings are also broadcast live on Charter Channel 191 and streamed via <http://townhallstreams.com/locations/mansfield-ct> if you want to watch and listen from the comfort of your home. I have attached a copy of the Commission's preapplication meeting policy as well as the preapplication materials we have received from the applicant.

If you have any questions regarding the rezoning/special permit process, please feel free to contact me either by phone (860.429.3330) or by email (painterlm@mansfieldct.org).

Linda

Linda M. Painter, AICP
Director of Planning and Development
Town of Mansfield

Telephone: 860.429.3330
Fax: 860.429.6863
Email: painterlm@mansfieldct.org

From: Kathy Usher [<mailto:kathy.usher@yahoo.com>]
Sent: Tuesday, May 24, 2016 4:45 PM
To: Paul M. Shapiro <ShapiroPM@mansfieldct.org>; Bonnie Ryan <bonbill@charter.net>; DeniseKeane2009@gmail.com; Peter Kochenburger <KochenburgerP@mansfieldct.org>; Alexander Marcellino <marcellinoa@mansfieldct.org>; Toni Moran <morant@mansfieldct.org>; Virginia Raymond <v.raymond@outlook.com>; Mark Sargent <msargent920@gmail.com>; Ben Shaiken <ShaikenB@mansfieldct.org>; Jennifer S. Kaufman <KaufmanJS@MANSFIELDCT.ORG>; PlanZoneDept <PlanZoneDept@MANSFIELDCT.ORG>; Matthew W. Hart <Hartmw@MANSFIELDCT.ORG>
Cc: Robert L. Miller <MillerRL@ehhd.org>; EHHD General Info <ehhd@ehhd.org>
Subject: Proposed Lodges at Storrs - CONCERNS AND FEARS - RE: 44 MEADOWOOD ROAD

TO: The Members of the Inland Wetland Agency

FROM: Brian, Kathy and Beth Usher

44 Meadowood Road

Storrs/Mansfield, CT

DATE: July 17, 2016

SUBJECT: PROPOSED STORRS LODGES

We are unable to attend Monday night's IWA meeting concerning the proposed building of Storrs Lodges as outlined in their application. We write this letter in opposition to the Storrs Lodges permit for the reasons listed below.

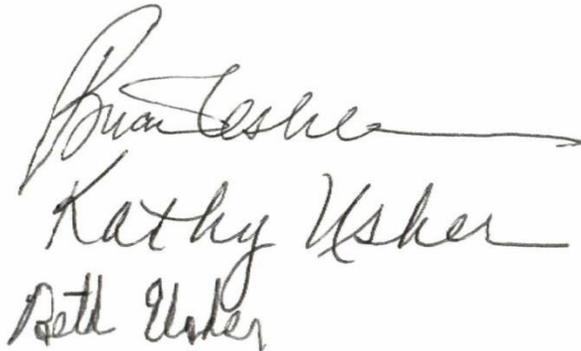
1. We have lived in our home since 1985. Our first level has been flooded numerous times due to the extremely high water table in our area. We were forced to put a costly and extensive drainage system around our home to prevent water from seeping into our home.
2. Currently, during rain, a small pond is created between our home at 44 Meadowood Road and the property to our right at 50 Meadowood Road. In addition, we have pooling in our front yard during heavy rain which seems to last several days.

3. We have suffered through UConn's Chemical Dump crisis and we are extremely worried about the potential contamination of our well water due to run-off contamination of the proposed Storrs Lodges site.
4. We are very concerned about the failure of our engineered septic system and leaching fields. These fields are in close proximity to the proposed Storrs Lodges and could be impacted by both run-off and shift of ground water due to the impact on wetlands by construction. We worry about the possible contamination and destruction of our property, septic system and well water due to run-off contamination when the buildings are completed and occupied.
5. Our property is downhill from the proposed Storrs Lodges which causes us deep concern in light of the high water table.
6. Because of the high water table and the enormous size of the proposed Storrs Lodges, there is not enough of a buffer between the abutting homes. Frankly, we fear a catastrophic impact.
7. Wetlands and vernal pools are important natural resources and we should do all in our power to protect them. There is not enough of a buffer between the proposed building site and the wetlands and vernal pool to protect them. We strongly believe that a large separation is needed between high density building and wetlands.

8. Students have trespassed on our property numerous times as they attempt to access Carriage House Apartments on Hunting Lodge Road. This will only get worse with an increase of 675+ students housed so close to the wetlands and vernal pool. How is the town going to protect our natural resources from added foot traffic?

Please protect our home from potential flooding and damage from the proposed Storrs Lodges. We invite members of the IWA to visit our property at any time to see and discuss our concerns.

In good faith,



Brian Usher
Kathy Usher
Beth Usher

860-208-4892

Kathy.Usher@yahoo.com

Jessie Richard

From: Jennifer S. Kaufman
Sent: Thursday, September 08, 2016 1:08 PM
To: Jessie Richard
Subject: FW: New Apartment Complex off Huntington Lodge Road

For the file

Jennifer S. Kaufman, AICP
Environmental Planner
Inland Wetlands Agent
Town of Mansfield
4 South Eagleville Road
Storrs-Mansfield, CT 06268
860-429-3015x6204
860-429-9773 (fax)
KaufmanJS@MansfieldCT.org

-----Original Message-----

From: Jo Fox [mailto:jo.fox@att.net]
Sent: Wednesday, September 07, 2016 7:34 PM
To: Jennifer S. Kaufman <KaufmanJS@MANSFIELDCT.ORG>
Cc: 'Bev Sims' <beverly_sims@sbcglobal.net>
Subject: New Apartment Complex off Huntington Lodge Road

We are opposed to the Storrs Lodges project.

Not only will it impact the wetlands in that area, but it will bring more heavy traffic into already dangerous conditions on Hunting Lodge Road.

Please keep what is left of our residential area a decent place to live.

The semester began only a few days ago and there have already been 3 emergency vehicle episodes with blaring sirens in the few hours we were home!

That's too much! Adding 700 students and 600 cars will increase this activity to the level one would expect in a city, not in Storrs.

Thank you for your support.

Sincerely,

Jo & George Fox

Brian Usher comments to IWA on September 6, 2016

My name is Brian Usher and I am here tonight representing my wife, my daughter, Beth, and my sister, Anne. We live at 44 Meadowood Road. Our property directly abuts the proposed Storrs Lodges. I believe we are one of four homes that directly abuts this project.

The magnitude of this proposed project scares us to death! If permitted, there will be forty-seven buildings, two hundred and eighteen units, nearly seven hundred students and six hundred cars! The proposal calls for five buildings in a row directly behind our home with another five buildings on the other side of this row, a total of ten buildings adjacent to our home and three other homes on Meadowood Road. One building is approximately sixty feet from our property line.

Our property and all of Meadowood Road is on an extremely high and fragile water table. We are surrounded by wetlands. We are very concerned that this massive construction will impact our water table causing water to flood into our home. We have dealt with severe flooding from the water table infiltrating our home for many years. We have partially solved this by installing an expensive drainage system around our home yet we still have a pond in our yard after heavy rains. This construction, being so close, can certainly have potential to cause flooding into our home.

We maintain an engineered septic system with an effluent pump. The leach fields are at the rear of our property, extremely close to the proposed row of buildings. What do we do if this construction raises the water table and if run off ground water from the construction floods the leaching field causing our septic system to fail?

We are downhill from this proposed development putting our home at an even greater risk from flooding and septic failure.

We have dealt with the UConn chemical pit disaster in the past. Who is responsible if this massive construction causes a shift in the underground water flow and, once again, contaminates and poisons our well?

We are very concerned about our safety and the safety of our home. We have dealt with students trespassing on our property as they venture out to Carriage House apartments walking through and leaving litter in the wetlands and in our backyard. This proposed project being so much closer will only increase this behavior. Meadowood Road is already being taken over by investors renting houses to students which has resulted in speeding cars, loud parties, students drinking alcohol on rooftops, a horrendous assault, and students knocking on our door late at night looking for the party house. Our daughter is hemiplegic and visually impaired and can no longer walk safely in her own neighborhood!

The developers and investors of this proposed project do not live in our community. Despite what may be said, their concern is simply their profit from this development; while our home values plummet. There is no way they have the love and commitment to our community that my family and other families who chose to live here have.

This proposed project is too large, not needed and extremely dangerous to our fragile environment, watershed, community, neighborhood and homes.

I am asking our town leaders and town council for your protection. What does my family do if our home is flooded, our septic system fails, and our well is contaminated as a result of this massive construction of

the proposed Storrs Lodges which is literally in our backyard? We ask for you to examine what is happening here and stop this proposal entirely.

At a minimum, we ask you to remove the ten buildings closest to our home from this proposal and maintain this area as a green space buffer between the development and our home and the homes of other direct abutters.

We also ask for a written response from our town council letting us know what guarantees and protection you will give us if you allow this project to move forward and our home is damaged. Who is responsible and who will pay for the damages incurred as a result of this development?

We ask all of you here to put yourself in our position. How would each and every one of you feel and what would you do if this development was sixty feet from your property?

We love this community and have been here for thirty-four years. Our children grew up here. When our daughter, Elizabeth, had radical brain surgery to cure a rare encephalitis resulting in a two month coma, right sided paralysis, right sided vision loss in both eyes and spinal fusion, this town and our community supported us, helped us and comforted us. We found refuge in our home and neighborhood. We fear that we will no longer have that refuge.

We understand that the owners of the property which proposes the Storrs Lodges have the right to request this development. But simply having the right to do something does not mean it is the right thing to do.

Thank you for your time and for your due diligence in this critical matter.

October 5, 2016

Mansfield Inland Wetlands Agency
4 South Eagleville Road
Mansfield, CT 06268

Subject: An Analysis of Parking Requirements for Student Housing contained in the Storrs Lodges Inland Wetlands Application

Dear Members of the Mansfield Inland Wetland Agency;

Central to the analysis of the inland wetland and stormwater management impacts of the Storrs Lodges is the applicant's assumptions about parking requirements for "student housing." The amount of student parking directly impacts the analysis of stormwater runoff, water quality degradation and the functions and value of on-site wetlands. Simply stated, the more impervious surface area is dedicated to paved parking, the greater the amount of stormwater runoff with a corresponding increase in the discharge of roadway and automobile related pollutants.

Inappropriate Level of Parking

In my testimony to your Agency on September 6, 2016, I noted the inadequate parking proposed by the applicant. Specifically, the applicant is proposing 557 parking spaces for a total of 692 bedroom units on a site of nearly 46 acres. The applicant proposed parking spaces of 9 by 18 even though the current zoning regulations (i.e. September 2016 edition) call for a size of 9.5 by 19 feet. The current zoning regulations call for 2 spaces for each single or multi family dwelling unit (see page 144 of the zoning regulations). Using that criteria, the applicant would only require 436 parking spaces. However, the fact that 692 bedroom are proposed and the housing is designed for students, clearly indicates the key variable of analysis is not the number of dwelling units proposed but the number of bedrooms. For this reason, the town's parking requirements for multi-family housing are woefully inappropriate for the proposed project designed for student housing in a rural location.

Other municipalities have established parking requirements for multi- family housing that determine the number of parking spaces based on the number of bedrooms (e.g., [the city of Buellton, CA](#)). Indeed, according to a 2012 Florida Department of Transportation (FDOT) study, the best independent variable for estimating trip generation for suite-style student apartments is number of bedrooms.¹ While trip generation and parking generation rates for student housing are still in the formative stage of development, it is clear the applicant has not considered the uniquely rural character of the Storrs Lodges location and its dependence on automobile use.

Each student can be expected to need an automobile – even if that automobile is not used on a daily basis – in light of the fact that the entrance to the proposed student housing is 1.1 miles from the UCONN bookstore and about 2 miles from the nearest grocery store. The demand for parking is not determined by the frequency with which automobiles are used to drive to class. Automobiles may only be needed for occasional trips on weekends and for trips home and other recreational activities. Nevertheless, students will require automobile parking regardless of the frequency with which they make use of their vehicle.

Walking Distance Studies

Based on the finding in a 2012 [National Institute of Health \(NIH\) study](#), we can anticipate that only 16% of the students would consider walking to school. Of those that would consider walking the median distance they would be expected to walk would be ½ mile or no more than 10 minutes. The NIH funded study confirms that virtually all of the anticipated students who might live at Storrs Lodges will either take a bus or use an automobile to reach class or complete other activities. This study, clearly underscores the unrealistic assumption that three out of four students will not require an automobile. The NIH study confirms that 84% of the public will not routinely walk to work or school and those that do walk (i.e. 16%) less than 20% would walk a mile (i.e., 4% of all those in the NIH funded national study).

The University of Connecticut currently has nearly 13,000 parking spaces on campus and is planning an additional 5,600 more spaces to meet demand.² Campus parking spaces are most needed for students who commute from home, those who live too far off campus to avail themselves of UCONN bus service or those living off campus who simply prefer the convenience of automobile access to the campus. Regardless of the availability of bus service from UCONN to Storrs Lodges, students travel needs will not be entirely met by buses or through walking.

Planning Parking Needs for Worst Case – Not Best Case

The applicant has proposed .75 parking spaces for every proposed bedroom. While this may appear to be an improvement over the town's current parking criteria of 2 parking spaces per multi-family dwelling unit, it does not adequately account for worst case conditions. Parking standards must always consider the need for visitor parking and for parking of delivery and service vehicles. The proposed student housing at Storrs Lodges is quite similar to a boarding house arrangement where unrelated persons are living together. It is instructive that the town of West Hartford requires 1 parking space for each guest sleeping room for rooming houses and boarding houses.³ Similarly, Glastonbury requires dwellings, guest house, boarding, rooming or lodging house to have one (1) parking space for each dwelling unit, guest unit, boarding unit, rooming unit or lodging unit.⁴ The underlying assumption of the parking standards in these two municipalities is that parking is directly correlated with the number of bedrooms in the dwelling

unit when unrelated individuals are living together. The town should not be fooled by the applicant's proposal that student housing will have less parking requirements than multi-family housing. Indeed, the reality is quite the opposite especially when such housing is proposed in rural locations 1) outside of normal walking distances, 2) without immediate access to restaurants or grocery shopping and 3) where students are provided with enormous amount of on campus parking to meet their routine travel needs to class.

Parking requirements must also be based on the worst case development potential of any given land use. Zoning regulations must be uniform in character within a zone and can't establish different parking requirements for the same types of land uses. For example, the fact that MacDonald's restaurants generates the need for more on street parking and more queueing spaces for drive through restaurants than Burger King does not enable the Planning and Zoning Commission to establish different parking standards for these two retail restaurants. To do so would create "contract zoning" a form of control that nullifies the principles of uniform treatment of land uses within the same zone. The underlying principle of zoning is that a structure may ultimately be sold to another person to use it for similar functions as the previous owner. For this reason, zoning must always consider the worst case potential land use impacts of any proposed development – in this case not the applicant's proposed parking criteria. It is important to note that while parking requirements vary with the demographic profile of the occupants (i.e., elderly multi-family housing may have the need for fewer parking spaces) such concessions undermine the long term regulation of this housing for other multi-family purposes if and when the demographic characteristics of the town or the multi-family units change over time. In summary, the applicant has not made a reasonable case for only providing .75 parking spaces per bedroom

Increased Stormwater Runoff from Right Sized Parking

Based on the applicant's proposed parking approach (i.e. providing 557 parking spaces each of which is 9 by 18 feet in size), a total of 90,234 square feet of parking will be needed (note: this calculation excludes space required for aisles, roadways and loading and unloading areas). This level of paved parking is far less than the current Mansfield zoning regulations require (i.e. see page 143 of the town's zoning regulations which require parking spaces to be 9.5 by 19 feet in size).

Requiring the applicant to construct 557 parking spaces that meet the town's parking space size requirements, Storrs Lodges would require 100,539 square feet of parking or 10,305 square feet more parking than proposed in the application. More importantly, the applicant has suggested an inappropriate level of parking spaces per bedroom (i.e., .75 parking spaces per bedroom) which further skews the anticipated parking impacts of the proposed development as can be seen in the table below.

Impervious Surface Impacts of Storrs Lodges Project if They Were to Comply with Parking Space Requirements and Anticipated Student Parking Needs in a Rural Location

Size of Parking Space	Parking Spaces proposed by Storrs Lodges .75 space/bed	Parking Spaces Criteria Used by West Hartford for Boarding Houses 1 space/bed	Increase in impervious surface by applying 1 space/bed compared to Storrs Lodges proposal	Incremental increase in impervious surface by applying 1 space/bed and requiring adherence to town parking space size
(in feet)	(in square feet)	(in square feet)	(in square feet)	(in square feet)
9 by 18	90,234	112,104	21,870	
9.5 by 19	100,539	124,906		34,672

Since the applicant’s stormwater analysis reflects a proposal that is inconsistent with the town’s parking space requirements and is also inconsistent with the anticipated parking demand for a student housing development far removed from the university campus, the true impacts to on-site wetlands have been significantly under-estimated. The applicant has failed to make a reasonable case for why 1) smaller parking spaces should be allowed and 2) a rural housing development would not generate a strong demand for on-site student parking. While the applicant may have identified other student housing projects in other parts of the United States that have been approved with less than 1 parking space per bedroom, these locations are generally in suburban and urban locations where student housing is well integrated within an urban community where mass transit and goods and services are readily available.

Impacts on the Definition of Family

The applicant is proposing to construct 128 dwelling units with 512 beds (i.e., 4 bedrooms per dwelling unit) and 90 dwelling units with 180 beds (i.e., 2 bedrooms per dwelling unit). The combined total of 692 dwelling units results in an average of 3.17 persons per dwelling unit overall. Authorizing more than 3 unrelated persons to constitute a family – as is proposed for 128 dwelling units in Storrs Lodges – is not in compliance with the town’s definition of family. Mansfield has a rather complex definition of family by comparison to most zoning regulations in Connecticut. Nevertheless, it is clear that the current zoning regulations prohibit more than 3 unrelated individuals from constituting a family (see pages 17-18 of the zoning regulations) unless they meet a very restrictive residency requirements that students are unlikely to adhere to. Unsupervised off campus student housing for up to four (4) unrelated students is an invitation for a wide range of housing enforcement problems that the town of Mansfield should not even consider based on its current definition of family. More importantly, since one of the purposes of zoning is to establish uniform standards of land use (i.e., the Connecticut General Statutes state that zoning “regulations shall be uniform for each class or kind of buildings, structures or use of land throughout each district...”) there is strong case to be made that the

Storrs Lodges project would violate the “uniform treatment” standard when compared to similar housing types within the town.

Storrs Lodges’ proposal to create four (4) bedroom units should be denied for the following reasons: 1) it is inconsistent with the definition of family in the current zoning regulations; 2) it creates a disparity in the uniform application of family values across all multi-family housing types and 3) it would create an unnecessary and dangerous distinctions between the definition of family in a single family residence, a family in a multi-family residence and a family in the proposed Storrs Lodges student housing. The only defensible approach is to 1) limit the applicant to a maximum of 3 bedrooms per dwelling unit consistent with the current definition of family in the zoning regulations and 2) require the applicant to meet defensible, evidence based, parking requirements for the project.

Consequences of Not Providing Adequate Housing

While there are definite benefits to stormwater management by reducing parking standards, the Planning and Zoning Commission has an obligation to apply appropriate “worst case” standards for land uses that are being addressed in a “de novo” context (i.e., since the town does not have student housing regulations, it must consider the adverse consequences of applying inappropriate parking standards to the proposed project). There are several adverse consequences that will ensue if the Commission applies inappropriate parking generation rates to the Storrs Lodges project. First, when a project provides inadequate parking, the parking needs of the inhabitants do NOT disappear – they merely encroach upon lawns, driveways and other open space areas as demand requires. The result is that the soils immediately surrounding the allocated parking spaces and dwelling units become compacted by routine vehicle parking. This in turn increases the rate of stormwater runoff which in turn adversely affects the stormwater calculations and management plans proposed by the applicant.

Secondly, lack of adequate parking can result in parking encroachments onto the common drive connecting the proposed development to Hunting Lodge road. Such encroachments not only create safety hazards for the free flow of traffic, they also can adversely affect the removal of snow during the winter months. If snow removal is not managed properly, the applicant’s proposed snow removal plan will be compromised and will result increased winter time pollutant loadings into the wetlands within the proposed development.

Conclusion

The applicant has not made a credible case for his request for smaller parking spaces, nor has he provided convincing evidence that .75 parking spaces per bedroom will be sufficient to handle the anticipated student parking demand at this rural site. Indeed, there are numerous studies that indicate students will have a greater need for automobiles when living in rural student housing located over one mile from campus – even when bus service is available –

compared to suburban and urban student housing locations.

My previous testimony raised a wide range of technical flaws with the proposal that require remedy before the Commission should even review the merits of a smaller scale project consistent with the concerns raised in this memorandum.

Respectfully submitted,

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¹ Florida Department of Transportation, Trip generation Recommendations Report, October 2014, p. 14.
Accessed on 9/20/2016:

<http://www.dot.state.fl.us/planning/systems/programs/SM/tripgen/Recommendations%20Report141023.pdf>

² CT Daily Campus, January 27, 2016.

Accessed on 9/20/2016: <http://dailycampus.com/stories/2016/1/27/uconn-looks-to-tackle-parking-woes>

³ West Hartford, CT Zoning Ordinance, Section 177.32.

Accessed on 9/20/2016: <http://www.ecode360.com/7295538>

West Hartford's zoning ordinance defines boarding house as: " A dwelling occupied by three or fewer persons who are lodged with or without meals, in which there are provided such services as are incidental to its use as a residence for the occupants and for which compensation is paid, either directly or indirectly."

⁴ Glastonbury, CT zoning regulations, Section 9.11b, p. 132.

Accessed online on 9/20/2016: <http://www.glasct.org/Home/ShowDocument?id=13279>