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January 25, 2023

Mr. Bruce Fitzback
Town of Putnam
Land Use Agent
200 School Street
Putnam CT 06260

RE: 285 River Rd LLC and Putnam River Rd LLC
Inland wetland application review
Town of Putnam
CLA 7399

Dear Mr. Fitzback:

Per your request, CLA has reviewed the additional materials submitted by the applicant received by CLA via email on January 24, 2023. The additional materials are listed below

The information reviewed included:

1. A response letter dated January 23, 2023 prepared by Provost & Rovero.
2. A plan set revised to 1/20/23 prepared by Provost & Rovero
3. A letter from the soil scientist, Joseph Theroux CSS, dated 1/20/23
4. A hydrogeological letter of report dated January 23, 2023 prepared by One Earth Environmental on behalf of the applicant.
5. Additional groundwater monitoring data for the month of January 2023.
6. A letter from Heller, Heller & McCoy to Bruce Fitzback, Land Use Agent, dated January 17, 2023 granting a 30 day extension to the Putnam IWWC.
7. A letter from Bruce Fitzback to 285 River Rd LLC and Putnam River Rd LLC indicating that the IWWC would retain CLA Engineers for third party review.

CLA has reviewed the recently submitted materials and finds that they are responsive to the comments of our January 17, 2023 letter. Additional explanation, on a comment-by-comment basis is given below with CLA's original comment in boldface:

General Comments Regarding Potential for Wetland Impacts

1. **Per the project plans revised to 12/28/22, there are no proposed direct wetland impacts such as filling, excavation or discharge to inland wetlands.**

No response was required.

2. **Based on the 12/28/22 plans, there is no longer a proposal to construct a clear span bridge over Carpenter Brook as was shown in previous submittals. This is a positive revision in that it further limits the potential for wetland impacts. It is CLA's experience this type of revision, i.e. one that further reduces the potential for wetland impact, does not require submittal of a new application to the Commission. In fact, this is a typical occurrence during the Commission's consideration of an application.**

No response was required.

3. **CLA believes that the applicant has presented a reasonable set of alternatives that minimize the potential for direct wetland impact; however, the potential for hydrologic impacts needs further consideration.**

This has been addressed per item 4 below.

4. **The available hydrologic data are incomplete and do not assure the commission of a lack of hydrologic impact to wetlands. CLA concurs with the Weston and Sampson Hydrogeologic Impact Assessment that the currently available data cannot rule out the potential for the Phase 1 fringe wetland to experience a hydrologic change due to a steepening of the vertical groundwater gradient due to the proposed excavation. Additional hydrologic data collection and impact analysis in that part of the site is warranted. This may result in the need for a functional analysis of those wetlands.**

The hydrogeological letter of report dated January 23, 2023 prepared by One Earth Environmental on behalf of the applicant addresses this issue. The report presents the results of addition onsite exploration that indicates that the proposed excavation will not adversely affect the vertical groundwater gradient of the fringe wetland. No further investigation or functional assessment of wetland is warranted.

5. **The available hydrologic data are incomplete with regard to duration and period. CLA's experience indicates that ground water levels should be monitored through at least one full wet season (December through early May) in order to predict seasonal fluctuation and seasonal high water. For this site, it is important to understand if the northerly proposed basin will discharge water to the nearby wetland, and if so, how much and when. This also may require a functional analysis of that wetland. Note that the water level here rose approximately 3 feet from November 2022 to December 2022. The applicant's Hydrogeologist had only data through October 2022 available**

CLA examined the additional groundwater monitoring data for the month of January 2023 and compared it to groundwater monitoring at nearby sites available the USGS website

<https://waterdata.usgs.gov/nwis/gw> and feels that the applicant's assessment of groundwater elevations at the site is justified. No further wetland assessment is warranted.

- 6. Test pit data for some of the pits around the northerly proposed pond (lots 5 and 6) are missing and should be provided (i.e. TP-6 and TP 6-7). Also TP 7-1 and 7-2 show shallow depths to ledge. Boring log data indicate greater depth to bedrock than is shown by the test pits. Additional data are needed to determine if the site requires excavation of ledge, and if so, does the rock to be removed present the potential for acidic runoff?**

The explanations given in the Provost & Rovero of January 23, 2023 as to the test pit data are consistent with CLA's experience excavating test pits for on-site septic systems. No further investigation or data are needed.

- 7. The CTDEEP Natural Diversity Database does not indicate any known protected species on the site, thus no additional protection measures are warranted.**

No response was required.

- 8. Carpenter Brook is not shown as a cold water stream on CTDEEP <https://ctdeepwatermonitoring.github.io/ColdWaterHab/>, thus the vegetated buffer to remain around it appears adequate.**

No response was required.

Editorial Comments

- 1. Show feasible soil stockpile locations for each lot and the pond excavation.**

This has been shown on the plans.

- 2. Show additional stabilization of the sediment to be deposited on 3:1 slopes, using either erosion mats or a spray on fiber mat.**

This has been shown on the plans.

- 3. The sediments to be deposited on site are proposed to come from a washing operation. Indicate how de-watering will be accomplished.**

The applicant has indicated that the sediments will be de-watered before they are brought to the site. This is a suitable response and referable to the transport of wet material to the site.

- 4. Show feasible de-watering locations and details for materials to leave the site.**

This has been shown on the plans.

5. Provide protection from erosion due to “run on” for the northerly pond excavation.

The additional E&S measures called for on the plans address the potential for “run on”.

6. The site should have weekly E&S inspection and reporting to the Town.

CLA concurs that the site will be a self-contained excavation, and unlikely to require weekly inspection internally. Of greater concern is maintenance of the tracking pad and dust control. Provided these controls are well maintained, less frequent inspection would be warranted.

7. A water tank truck should be on site at all times for dust suppression.

Provost & Rovero indicate on the plans that a watering truck will be available on a daily basis, though it might also be used on nearby sites. This is a suitable means of providing regular dust control if adhered to.

8. Provide orange construction fence at the limits of clearing to minimize the potential for over excavation.

This has been shown on the plans.

Summary

In summary, the recently submitted materials listed above address the comments in CLA’s letter of January 17, 2023. CLA believes that the applicant’s additional hydrogeological report addresses the concern regarding the potential for alteration of the hydro period of the “fringe” wetland near the southern pond. CLA also believes that the applicant’s additional groundwater monitoring addresses the concern regarding the elevation of seasonal high water in the ponds. The editorial comments on the plans have also been addressed. The Commission, should they approve the application, may wish to add a condition that the applicant install additional E&S measures for dust control and street sweeping at their, or their agent’s request.

Sincerely,

Robert C Russo

Robert C. Russo
Soil Scientist