

Groton Open Space Association, Inc.

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www.GOSAonline.org



To: Town of Groton Zoning Commission
From: Groton Open Space Association, Inc.
Subject: WRPD Regulation Amendment
January 4, 2017

GOSA appreciates the year-long effort by the Commission, staff and consultants to update the regulations for the Groton Water Resource Protection District. The proposed regulations will strengthen protection of Groton's drinking water.

However, we believe there is still room for improvement in two important areas:

The first:

6.12-8.C. Non-Disturbance Area

A minimum 50-foot non-disturbance area must be maintained between perennial watercourses, waterbodies, and directly adjacent wetlands and the developed land area....

GOSA recommends a minimum vegetative buffer of 100-200 feet. The literature cited in Zell Steever's report supports varying buffer widths, depending upon specific slopes, soils and proposed activities. However, since a regulation is necessarily crafted in the absence of site-specific details, a default buffer would need to be wide enough to cover a variety of situations. 50 feet will protect a wetland edge, but will not provide the pollution filtration, temperature control or nutrient uptake necessary. The Inland Wetlands Agency would have discretion to make adjustments, if needed, based on expert testimony from a soil scientist or engineer.

The second:

6.12-8.A Impervious Surface

Total impervious surface area must not exceed 70% of total lot area.

Negative impacts from storm water runoff can be measured at levels as low as 10% total impervious surface area. Highly unusual circumstances and extensive engineering would be required to justify coverage as high as 70%. 30% would make a better starting point as a default maximum, assuring better control of thermal and pollution impacts and minimizing storm water runoff, velocity, scouring and erosion.

We thank you for taking time to listen to and address our concerns tonight.

Sidney Van Zandt

GOSA Vice President