October 13, 2026

Mr. James Ventres, Land Use Administrator
Town Office Building
1 Plains Road, PO Box 385
Moodus CT 06469

Re: Davison Environmental ("DE") Review
Four Corners Village Project
Inland Wetlands Permit Application

Ms. Ventres,

Davison Environmental ("DE") reviewed the following documents pertaining to the above-referenced Town of East Haddam Inland Wetlands and Watercourses Commission ("IWWC") Application:

1. Four Corners Village Project, Project Plans, Commerce Drive – Route 82 – Town Street, East Haddam, Connecticut, Casner Realty Inc., August 14, 2026, Revised September 15, 2026
2. Wetland Application, August 12, 2026
3. Environmental Report, September 3, 2026
4. Jacobson Review Letter, October 7, 2026

In addition, I conducted a site walk on the referenced project site on October 1, 2026. The following are comments from my review.

Site Wetlands, Wetland Delineation, and Environmental Report

1. Site wetlands are forested and characterized by seepage (groundwater discharge) areas within the southern finger which drains north to Succor Brook which flows into the site from east to west beneath Town Street and continues along Route 82 before exiting the site via

a culvert beneath Route 82. Succor Brook drains into the Connecticut River to the south of Goodspeed Opera House.

2. An intermittent watercourse was observed approximately 50' upgradient of WF 30 and flowing parallel to the delineated wetland boundary. This watercourse is not shown on the plans. It was flowing at the time of the inspection. It appears to originate from a low-lying area adjacent to a stone wall near the southern site boundary. See Photos 1 and 2.
3. The Environmental Report should include additional information including details of the delineation, wetland functions and values, and an assessment of the potential impact to wetland functions and values.
4. Paragraph one of the Environmental Report states that the wetland proposed for filling has a "low function value"; however, it is adjacent to Succor Brook, a perennial watercourse that flows to the Connecticut River.
5. Paragraph two of the Environmental Report states that there is grading proposed 20 feet from wetlands but the plans show grading within wetlands in two locations.
6. The third paragraph of the Environmental Report indicates that the biofiltration basin is designed to be a wetland, please clarify if this basin is not intended to function as a bioretention or biofiltration basin. The plantings also appear to be more appropriate for a wetland.
7. The site is located within a DEEP Natural Diversity Database polygon indicating the potential presence of State-listed species.

Biofiltration/Bioretention Basin and Stormwater Treatment

8. The plans do not include details for the biofiltration/bioretention basin, including an appropriate soil medium with depths, and drainage structures.
9. Biofiltration and bioretention basins require 3 feet of separation from the bottom of the basin to groundwater. The basin bottom is at 237' which is at or very near the elevation of the adjacent wetland. Where adequate separation is not possible, a liner may be required.
10. As noted in the Jacobson letter (Stormwater Comment #2), the basin does not include a pre-treatment BMP such as a forebay.
11. The basin outlet and associated grading is in a wetland within feet of an "existing detention basin" located fully within the site wetland and which appears to discharge directly to Succor Brook. Discharging stormwater to uplands above wetlands with an adequate buffer to infiltrate and further attenuate pollutants is preferable to direct discharges to wetlands particularly near a perennial watercourse. Stormwater treatment systems cannot fully attenuate pollutants, even when optimally designed and constructed.

12. Connecticut's 2024 Stormwater Quality Manual (Table 10- 3 "Recommended Minimum Horizontal Setback Distances for Stormwater Infiltration Systems") recommends a minimum setback from stormwater infiltration systems to wetlands and waterbodies of 50 feet to minimize potential adverse impacts to water quality.
13. Portions of the access drive are designed to drain directly to leak-offs which would discharge untreated stormwater directly to wetlands.
14. Portions of the Building #4 parking area appear to only receive treatment from catch basins prior to discharging to site wetlands.

Erosion and Sedimentation Controls

15. There are discrepancies between the locations of silt fence/wood chip berm shown on the Overall Site Plan (Sheet 2) and the more detailed Stormwater Management Plan and Erosion and Sediment Control Plan (Sheets 3 & 4). For example, the perimeter controls are missing from portions of the bioretention basin and wetland crossing on Sheets 3 & 4.

Respectfully submitted,



Matthew Davison
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Professional Wetland Scientist
Certified Professional in Erosion and Sediment Control
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SITE PHOTOGRAPHS



Photo 1: View of the intermittent watercourse not shown on plans



Photo 2: View of the intermittent watercourse not shown on plans



Photo 3: View of Succor Brook where it flows along Route 82



Photo 4: View of Succor Brook where it exits the site beneath Route 82