

Environmental Land Solutions, LLC

Landscape Architecture & Environmental Planning

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July 21, 2021

VIA E-MAIL

Mike Conklin
Inland Wetlands Commission
Town of Wilton
Town Annex
238 Danbury Road
Wilton, CT 06897
mike.conklin@wiltonct.org

Re: Inland Wetlands Commission Application No. 2714(S)
Address: 141 Danbury Road, Wilton, Connecticut
Applicant: FDSPIN 141 DR LLC

Dear Mr. Conklin:

As you know, we are working with, FDSPIN 141 DR LLC (the “**Applicant**”), in connection with the above referenced application. We are in receipt of the memorandum from the Conservation Commission dated July 8, 2021 and offer the following item-by-item responses for the members of the Inland Wetlands Commission:

- *With respect to the conservation measures built into this project, the Conservation Commission offers kudos to Tighe & Bond/Environmental Land Solutions and the developer for the strong proposal of conservation-related recommendations - namely, the pervious pavers in the parking areas, the stormwater system to address runoff under the building, the use of pollinator-friendly native plantings throughout the landscaped areas, the downward-pointing lighting fixtures, the structuring of the riprap to enable habitat development with native plantings growing into that area. We are hopeful that this plan will become a model for conservation measures as properties are developed going forward.*

The Applicant is appreciative of the Commission’s positive feedback regarding the proposed conservation measures, and its recognition of the time and effort the Applicant’s team put into the design.

- *While we do recognize the need for height to accommodate the development goals of this project, we are concerned about the impact of such a tall structure in casting shadows that could affect the successful growth and resilience of the plantings proposed.*

Additional building height is necessary to achieve the dramatic building setback from the Norwalk River and the enhanced landscaping. However, the planting plan takes shadowing into account and the plantings will not be negatively impacted by the building height.

- *Another consideration of the Commission pertains to clarifying or changing the wording on LP-1 Nonnative Invasive Species Control Notes, "Scope of work may vary year to year based on financial limitations." The vagueness of this caveat could lead to a lack of ongoing responsibility in regular attention to invasive species eradication which would ultimately (and rapidly) lead to degeneration of the conservation planting areas. To ensure this does not happen, in addition to the two-year bond, we recommend a method of ensuring the plantings and eradications are conducted appropriately by including periodic oversight/consultation from an expert (such as ELS). Because the invasive species on this property are known to require extensive and long-term attention, two years will not be sufficient to maintain their eradication.*

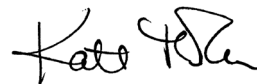
The Applicant suggests modifying Note #1 to clarify that the removal of invasive plants will be ongoing and specifically included in the landscape management plan for the property.

- *Last, while the mechanism for eradication is specified with care, the location of the invasive species adjacent to the Norwalk River makes use of herbicides especially controversial and concerning. The Conservation Commission strongly recommends that all procedures follow and meet the requirements of Local, State and Federal laws respecting protection of water quality and wildlife conditions of the Norwalk River and its downstream neighbors (e.g., Long Island Sound.)*

The Applicant suggests revising Note #3 to state: "Any herbicide used to control invasive species in the upland review area will be applied by an applicator licensed in the State of Connecticut."

Thank you for the opportunity to respond to these comments. If you or the Inland Wetlands Commission have any additional questions, please let me know.

Sincerely,



Kate Throckmorton

cc: E. Larkin
Development Team