



Trinkaus Engineering, LLC

114 Hunters Ridge Road
Southbury, Connecticut 06488
203-264-4558 (office)
+1-203-525-5153 (mobile)
E-mail: strinkaus@earthlink.net
<http://www.trinkausengineering.com>

March 17, 2024

Mr. Nick Lee, Chairman
Inland Wetlands Commission
238 Danbury Road
Wilton, Connecticut 06897

RE: Old Driftway, LLC
0 Mountain Road
Wilton, Connecticut

Dear Mr. Lee and Members of the Inland Wetlands Commission,

Based upon the public hearing last week, I have the following final comments on this application for the record.

Comment by attorney Kelly who asked how I would design a crossing of this vernal pool.

I would not design a crossing of the vernal pool as any type of crossing will have a significant negative impact to the vernal pool edge due to excavation, filling, and placement of some type of structural system for the driveway.

Stormwater Management:

The applicant has not proven by actual field infiltration testing and hydrologic modeling that all proposed underground gallery systems will infiltrate runoff thus reducing post-development runoff volumes.

The applicant has not proven by actual field infiltration testing and deep test holes under the two areas of permeable pavement that the soils are suitable for permeable pavement and that runoff will infiltrate into the ground.

The proposed stormwater management system will only reduce TSS loads by 9% (deep sump catch basin only), which does not meet the CT DEEP goal of 80% TSS reduction for post-development runoff. As the applicant has not proven that the underground galleries will infiltrate runoff, no TSS or other pollutant reduction can be applied to the underground gallery systems.

Vernal Pool Crossing:

This crossing will have a direct, adverse impact on the edge of the vernal by the installation of the proposed box culverts as it causes a physical loss of high quality wetland resource. Alternatives suggested by the applicant, such as the installation of bottomless concrete culverts on spread footings or piles has not been proven that it could be installed without a

significant impact to the vernal pool and thus should not be considered a viable “feasible and prudent alternative”. The bridge alternative has also not been shown that it could be installed without a significant environmental impact on the vernal which would result from the movement of heavy equipment moving over the vernal pool to install the northern abutment for a bridge.

In both cases, the soils along the vernal pool would not be able to support the movement of heavy earthmoving equipment or cranes which are necessary to construct either suggested alternative.

Tree Impacts:

There has been no discussion by the environmental consultant on the potential impacts of tree removal near the vernal pool for the driveway construction and how the removal of trees which provide significant shade could impact the temperature of the water in the vernal pool.

Regarding attorney Kelly’s comments on impacts to trees along the Old Driftway, I have the following comments based upon my degree in Forest Management. If a limb (healthy, dead or dying) is overhanging a property line where if the limb were to break and fall on the next door property and cause damage to the property, the owner does have the right to remove the offending limb after notifying the owner of the tree. Similarly, if the root system of a tree is causing damage to a paved driveway, the offending roots may be cut by a qualified arborist to stop the damage to the driveway.

It is my opinion based upon my forestry knowledge that the situation is not as clear when the roots, which provide support and a source of water and nutrients to the tree are significantly removed to permit the construction of a driveway and will likely result in the death of the tree over time.

Thank you for the opportunity to provide these final comments on the application.

Respectfully submitted,
Trinkaus Engineering, LLC

A handwritten signature in cursive script that reads "Steven D. Trinkaus".

Steven D. Trinkaus, PE