

January 12, 2023

Water Pollution Control Authority
Town Hall
238 Danbury Road
Wilton, CT 06897

WPCA Chair Vanderslice & Commission Members:

Re: MR#154, 8-24 Referral - Wilton Water Pollution Control Authority/Baywing LLC – Sanitary sewer line extension - 19 Cannon Rd to Danbury Rd

Many of the points included in this letter were previously submitted to Planning and Zoning and the WPCA in October and November 2022. I agree some of the arguments have been repeated but it is necessary if only to underscore the applicant's blatant denial of the facts. We are not blind to the facts and will continue to act as a reminder to the additional information has come forward that further counter the applicant's request.

This information is a matter of public record, easily obtained from Wilton land records, wetland maps and other information from well-documented photos (late 1800's – early 1900's) and historical mappings (first mentioned 1738, first mapped 1856) of Wilton's roads that commemorate the families and properties that together defined the "historic Cannondale Node". All underscore the historic importance of the Cannondale area.

While we understand your scope is narrow, Wilton residents and Planning & Zoning have all overwhelmingly opposed the application or voted for denial. That vote reflects the facts and considerable research and deliberation.

While the applicant regrouped and reassessed its approach the representations made by the applicant continue to be cherry-picked /partial, irrelevant or unquestionably inaccurate. These included references from Attorney Hollister's submission letter regarding:

- Aquifers/watersheds, historic designations
- Continued reference to the eleven-year-old lapsed approval for a different project that was never constructed, on a different parcel and under an outdated POCD. This has been deemed irrelevant.
- Statements/conclusions inaccurately attributed to (and now retracted after being called out) the Town Engineer and Director of Public Works regarding capacity and the lack of any engineering or environmental issues.
- "Designation for Sewer Service" referencing the Cannondale Node, the applicant selectively uses the POCD to its benefit but simultaneously saying the POCD cannot be used by P&Z for planning and then later contradicted during the September 14, 2022 WPCA meeting.

My opposition is not about anti-development. There are clear reasons that require the **application's denial**. Many are carefully documented by Wilton's POCD when not taken out of context and further supported by the State's Conservation & Development Policies: The Plan for Connecticut 2018-2023 guiding principles.

The applicant's premise that the application is consistent with the POCD is inaccurate.

It ignores the overwhelming majority of references and cautions throughout the document that address the POCD organizing principles of our Natural and Historical Environment, Human and Economic Environment and Built Environment. Dozens of references in the POCD specific to Cannondale identify the need to:

- (Section3.1.) Conduct a **master planning** process for Cannondale
- Strengthen the economic viability of the Cannondale area while **protecting its unique design and historical character**
- Establish **zoning incentives for preserving historic structures**

- Establish unique design guidelines for Cannondale with input through the master planning process that preserve historic character.
- Encourage mixed-use, residential, and commercial development of an **appropriate scale** and design, with possible form-based approaches, transit-oriented design, and **historical preservation as central principles**.

The applicant’s overview letter Paragraph B. references POCD pages 95 and 101 to support their limited view that 19 Cannon Road be considered as a “Sewer Growth Area”. Unfortunately, the applicant overlooked page 100 that establishes the following in regard to water and sewer planning goals. Further references that contradict the applicant’s position are included on POCD pages 23, 39, 61, 70, 71, 79, and 129.

- The Town has historically extended sewers *to serve community facilities, address public health concerns or to support appropriate development projects* on the fringe of the existing sewer service area. However, in the past 10 years only 3 such projects have been undertaken. Miller Driscoll School, School Sisters of Notre Dame, and Station Place/Wilton Commons. The one-off request under consideration hardly rises to this historical precedent.
- The POCD further notes under **Primary Sewer Avoidance – Sewers should not be extended** due to the presence of critical natural resources and a public water supply watershed.
- The above defines Cannondale, this site and immediately adjacent lands that include the vital aquifer, the only well Aquarion has in Wilton (see <https://goodmorningwilton.com/overflow-crowd-attends-deep-meeting-to-oppose-aquarions-water-diversion-application/>), and the Norwalk River. If there was ever an area to be “avoided” this would be it.

The POCD water and sewer planning goals are also supported by Conservation & Development Policies: The Plan for Connecticut 2018-2023 guiding principles.

Guiding Principle 4.4 Avoid activities that could negatively affect rare or unique ecological communities and natural areas, **including habitats of endangered, threatened and special concern species**, (see Trout Unlimited, Wilton CT report <https://www.mianustu.org/>) other critical wildlife habitats identified in the Connecticut Wildlife Action Plan, river and stream corridors, aquifers, ridgelines, large or connected forest areas, highland areas, coastal marsh migration areas, and Long Island Sound.

Guiding Principle 4.14 Support the introduction or expansion of public water and/or sewer services or alternative on-site wastewater treatment systems only when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern, and then introduce such services only at a scale which responds to the existing need without serving as an attraction to more extensive development.

Safety Considerations

- The Wilton Police Department recently identified the intersection at Cannon Road/Olmstead/Danbury Road as one of the most dangerous in Wilton due to the high (top 3) accident rates. The master planning process for Cannondale must be allowed to consider traffic safety as a critical factor. This impacts the health and safety of everyone.
- The frequency of storms and related flooding in addition to Danbury Road traffic accidents have resulted in increased closures. **This impacts everyone’s safety – residents, children on school buses, commuters, commercial vehicles, businesses.**
- The urgent Town emails are now a constant, **Detour!** Cannon is the only access for north and southbound traffic as well as access to east/west side roads (Seeley, Wampum, Honey Hill) for police, fire, and emergency medical responders and utility support crews. This leaves Cannon Road as the only alternative.

Our Health and Environment

Our most precious and limited resource is water. Nothing is more important and vital to our wellbeing than protecting the supply and quality of that resource. The debate should end here.

As reported by Aquarion in 2018 “The Aquarion well sits nestled on land between the *Norwalk River and the wetlands* created by the Department of Transportation after the widening of Route 7. It is the only well Aquarion has in Wilton. It’s located between Danbury Rd./Route 7 and Pimpewaug Rd., just south of the Cannondale train station”. 19 Cannon Road sits adjacent to this site that:

- Ensures the availability of safe/high quality water supplies.
- Plays a vital role in storm water management and flood control.
- Serves to increase groundwater recharge.
- Protects and ensures the integrity of all environmental assets critical to public health and safety.

I look forward to a thriving Cannondale Village with shops, activities, and yes, housing options in concert with all of the well documented goals and visions set out in the POCD. I previously requested that Planning and Zoning, as the primary authors and keepers of our 2019 POCD embrace their hard work and be guided by all of the guiding principles by voting for denial of MR#154. They did.

I ask that the WPCA consider the facts and not the egregious misrepresentations continually made by the applicant. I ask that you respect the decision of Wilton’s Planning and Zoning Commission, Historic District and Property Commission, concerns of our Town Engineer, expertise of the NRWA, carefully crafted POCD and last but not least the public. Deny this request.

Respectfully,

Sara Curtis
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Wilton CT