

**APPLICATION OF EDGEWATER HILL ENTERPRISES, LLC TO  
EAST HAMPTON INLAND WETLANDS AND WATERCOURSES COMMISSION**

**NARRATIVE DESCRIPTION AND CONSTRUCTION SEQUENCE RELATIVE TO  
THE DEVELOPMENT OF SALT POND APARTMENTS AT EDGEWATER HILL,  
CONTAINING FORTY (40) PROPOSED RESIDENTIAL UNITS AND CONSTITUTING  
A COMPONENT OF THE EDGEWATER HILL MASTER PLANNED COMMUNITY  
000 EAST HIGH STREET (CONNECTICUT ROUTE #66), EAST HAMPTON,  
CONNECTICUT**

**DATE: DECEMBER 16, 2020**

**RECEIVED**  
**DEC 16 2020**

**PROJECT OVERVIEW:**

**TIME** \_\_\_\_\_

Salt Pond Apartments at Edgewater Hill is a proposed forty (40) unit residential community within the overall Edgewater Hill Master Planned Community located on the southerly, easterly and westerly sides of Edgewater Circle in the Town of East Hampton, Connecticut. The development of the Salt Pond Apartments at Edgewater Hill is consistent with the approved Master Plan for the Edgewater Hill Community which was reviewed by the Town of East Hampton Inland Wetlands and Watercourses Commission on April 25, 2012. The site plan submitted herewith is consistent with that Master Plan review. The project will be served by public water and public sewer.

In conjunction with the development of the Salt Pond Apartments at Edgewater Hill, the Applicant is proposing to conduct three (3) regulated activities, as hereinafter described. The development plan for the Salt Pond Apartments at Edgewater Hill has been formulated by the Applicant's consulting engineers, Boundaries, L.L.C. to (i) attain consistency with the approved Master Plan for Edgewater Hill and (ii) accomplish the following goals while allowing the Applicant to develop this phase of the Edgewater Hill Project in accordance with the conceptual design contemplated by the Edgewater Hill Master Plan:

- (a) To avoid, to the maximum extent possible, wetland and environmental resources located on the Property.
- (b) To renovate stormwater runoff from improved portions of the project site in accordance with the 2004 Connecticut Stormwater Quality Manual.
- (c) To regulate and attenuate peak runoff flows during design storm events, and to renovate stormwater runoff quality in recognition of the fact that development is occurring in the ecologically sensitive Lake Pocotopaug Protection Area.

In order to accomplish the above listed development goals, the Applicant has incorporated the following mitigation measures into the design for Salt Pond Apartments at Edgewater Hill:

1. To fill a small pocket of isolated wetlands (designated by the H Series of Wetland Flags), comprising 2,250 square feet of wetland area as contemplated by the Master Plan for Edgewater Hill.
2. To maintain improvements outside of the limits of the 100 foot setback from the vernal pool located interior to Wetland A as contemplated by the Master Plan approval for Edgewater Hill.
3. By incorporating into the project vernacular a comprehensive stormwater management and water quality renovation system to comply with the requirements of the Town of East Hampton Regulations, the 2004 State of Connecticut Stormwater Quality Manual and to preserve the quality of stormwater runoff draining to Lake Pocotopaug.
4. To incorporate into the project design mitigation methodologies to control erosion and sedimentation during construction.

In conjunction with the instant application, the Applicant is seeking permits from the Town of East Hampton Inland Wetlands and Watercourses Commission for the following activities in conjunction with the development of the Salt Pond Apartments at Edgewater Hill:

1. A permit to permanently fill Wetland H which is a small, isolated wetland pocket which is not hydraulically connected with any other wetland on the project site. The Natural Resource Evaluation for the Edgewater Hill Master Plan prepared by Land-Tech Consultants, Inc. describes Wetland H as follows:  
  
“Wetlands G and H are hillside seep wetlands located on the north facing slope of the hill along the southerly property boundary. These wetlands are favored by Red Maple, American Beech, Black Birch and American Elm. Understory species include Sweet Pepper-Bush, Japanese Barberry, Poison Ivy, Violets, Virginia Creeper, Christmas Fern, Jack-A-Pulpit, Rubis, Bittersweet and Asters... These hillside seep wetlands have limited functions due to their small size and hillside landscape position. The primary function of these hillside seeps is groundwater discharge.”
2. To temporarily disturb 750 square feet of the wetland area (a component of Wetland A as described in the Land-Tech Consultants, Inc. report and depicted by Wetland Flags B-296 – B-305 to the West) by the installation of a corduroy crossing in order to enable access to the construction site from The Neighborhood at Edgewater Hill in conjunction with the development of the Salt Pond Apartments at Edgewater Hill. This temporary disturbance will be removed upon the completion of construction.<sup>1</sup>

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<sup>1</sup> It should be noted that future applications submitted by the Applicants to the Town of East Hampton Inland Wetlands and Watercourses Commission will encompass a future permanent crossing in this location in order to complete the

3. To disturb 298,993 square feet of upland review area in conjunction with the development of the Salt Pond Apartments at Edgewater Hill.<sup>2</sup>

## **SITE SOIL CHARACTERISTICS**

Soil characteristics on the project site are as follows:

### **UPLAND SOILS:**

- (a) **86d - Paxton and Montauk Fine Sandy Loams – 15 to 35% Slopes, Extremely Stony.**

The Paxton series consists of well-drained, non-stony to extremely stony soils that formed in compact, loamy glacial till. Paxton soils are found on the landscape on drumloidal upland landforms. Slopes range from 3 to 35%. Paxton soils are found in a drainage sequence on the landscape with moderately well-drained Woodbridge soils, poorly drained Ridgebury soils and very poorly drained Whitman soils. They are near somewhat excessively drained Hollis soils and well-drained Montauk, Charlton and Canton soils. Paxton soils have a more firm and compact C horizon than Canton and Charlton soils, are deeper to bedrock than Hollis soils, and have more silt in the Cx horizon than Montauk soils.

Montauk soils consist of well-drained, non-stony to extremely stony soils that formed in compact, sandy glacial till. Montauk soils are found on drumloidal upland landforms. Slopes range from 3 to 35%. The Montauk soils are found near well-drained Canton, Charlton and Paxton soils, moderately well-drained Woodbridge soils and poorly drained Ridgebury soils. Montauk soils have a more firm and compact C horizon than Canton and Charlton soils. Montauk soils have more sand in the Cx horizon than Paxton soils. The soil stratification for this soil is as follows:

Paxton and similar soils: 0" – 8" fine sandy loam; 8" – 15" fine sandy loam; 15" – 26" fine sandy loam; 26" – 65" gravelly fine sandy loam.

Montauk and similar soils: 0" – 4" fine sandy loam; 4" – 14" fine sandy loam; 14" – 25" sandy loam; 25" – 39" gravelly loamy coarse sand; 39" – 60" gravelly sandy loam.

The depth to bedrock is very deep in both soil groups. Permeability is very slow to moderate. Both soils are contained in Hydrologic Group C.

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construction of Edgewater Circle, the main thoroughfare which connects all components of the Edgewater Hill Master Planned Community.

<sup>2</sup> It should be noted that the amount of upland review area disturbance is dictated, in part, by the 200 foot upland review area in the Lake Pocotopaug Protection Area, and by the fact that the upland review area encompasses area adjacent to Wetland H which the Applicant is proposing to fill.

(b) **46c – Woodbridge, Very stony fine sandy loam – 8-15% Slopes.**

This sloping, moderately well-drained soil is found on drumloidal, glacial upland landforms. Stones and boulders cover 1 – 8% of the surface. Mapped areas are dominantly irregular in shape and mostly 2 – 25 acres. Included with this soil in mapping are small areas of well-drained Montauk, Broadbrook and Paxton soils and moderately well-drained Rainbow and Sutton soils. Permeability is moderate in the surface layer and subsoil and slow or very slow in the substratum. The soil stratification for this Woodbridge soil is as follows:

0” – 2” Moderately decomposed plant material.

2” – 9” Fine sandy loam.

9” – 25” Fine sandy loam.

20” – 32” Fine sandy loam.

32” – 67” Gravelly fine sandy loam.

The depth to the restrictive layer is 20” – 43”. This soil is in Hydrologic Group C/D.

**WETLAND SOILS:**

(a) **Ridgebury, Leicester and Whitman Soils:**

These nearly level, poorly drained and very poorly drained soils are found in drainageways and depressions on glacial till upland hills, ridges, plains and drumloidal landforms. Stones and boulders cover 8 to 25 percent of the surface. Mapped areas are long and narrow or irregular in shape and mostly 2 to 40 acres. Slopes range from 0 to 3 percent. The mapped acreage of this undifferentiated group is about 35 percent Ridgebury soil, 30 percent Leicester soil, 20 percent Whitman soil and 15 percent other soils. Some mapped areas consist of one of these soils, and other areas consist of two or three. These soils were mapped together because there are no major differences in use and management. Typically, the Ridgebury soil has a black, fine sandy loam surface layer 4 inches thick. The subsoil is gray and brown, mottled fine sandy loam 16 inches thick. The substratum is very firm, brittle, grayish-brown, mottled sandy loam to a depth of 60 inches or more. The Leicester soil has a very dark gray, fine sandy loam surface layer 6 inches thick. The subsoil is dark grayish-brown, grayish-brown and pale olive, mottled fine sandy loam 26 inches thick. The substratum is light olive gray, mottled gravelly fine sandy loam to a depth of 60 inches or more. The Whitman soil has a black, fine sandy loam surface layer 9 inches thick. The subsoil is dark grayish-brown, mottled fine sandy loam 7 inches thick. The substratum is very firm, brittle, grayish-brown, mottled fine sandy loam to a depth of 60 inches or more. The Ridgebury soil has a seasonally high water table at a depth of about 6 inches. Permeability is moderate or moderately rapid in the surface layer and subsoil and slow or very slow in the substratum. The available water capacity is moderate. Runoff is very slow or slow. The Leicester

soil has a seasonally high water table at a depth of about 6 inches. Permeability is moderate or moderately rapid. The available water capacity is moderate. Runoff is very slow or slow. The Whitman soil has a high water table at or near the surface for most of the year. Permeability is moderate or moderately rapid in the surface layer and subsoil and slow or very slow in the substratum. The available water capacity is moderate. Runoff is very slow, or the soil is ponded.

**GENERAL PROCEDURES:**

1. Prior to commencing construction of the Salt Pond Apartments at Edgewater Hill, the Applicant, the Applicant's contractor and the Applicant's consulting engineer shall meet with the East Hampton Wetlands Enforcement Officer and the East Hampton Zoning Enforcement Officer to agree upon the method of installation and maintenance of erosion and sediment control measures for the development of the project.
2. The project site shall be cleared within the clearing limits delineated on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Overall Layout Plan' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: 1" = 30' Date: December 2020 Job I.D. No. 20-2853 Sheet No. 4/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/www.boundariesllc.net". Upon clearing the construction area, the Applicant shall install erosion and sediment control measures as delineated on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Erosion and Sedimentation Control Plan' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: 1" = 30' Date: December 2020 Job I.D. No. 20-2853 Sheet No. 16/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/www.boundariesllc.net" (the "Erosion Control Plan").
3. The Applicant shall install the anti-tracking pad at the construction entrance to the project site in the location delineated on the Erosion Control Plan.
4. Subsequent to the installation of perimeter erosion and sediment control measures in accordance with the Erosion Control Plan and the Erosion Control Narrative delineated on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Erosion and Sedimentation Control Notes' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: As Noted Date: December 2020 Job I.D. No. 20-2853 Sheet No. 18/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/www.boundariesllc.net" (the "Erosion Control Narrative"), the Applicant shall notify the East Hamptons Wetlands Enforcement Officer and the East Hampton Zoning Enforcement Officer that erosion and sediment control measures for Salt Pond Apartments at Edgewater Hill have been installed and request that the same be inspected and approved by the East Hampton Wetlands Enforcement Officer and the East Hampton Zoning Enforcement Officer. In addition, the Applicant shall notify Steven Trinkaus, professional engineer, and third party review consultant for the protection of the Lake Pocotopaug watershed, to inspect and approve the installation of erosion and sediment control measures.

5. All activities in conjunction with the development of the project shall be conducted in accordance with the terms and provisions of the Erosion Control Plan, the Erosion Control Narrative and this Narrative. The East Hampton Wetlands Enforcement Officer, the East Hampton Zoning Enforcement Officer and Steven Trinkaus, third party consultant, shall have authority to modify any construction details or procedures hereinafter contained as warranted by field conditions for the duration of the development of the project. For purposes of this Narrative, the "Plan" is defined as the "Site Development Plan Salt Pond Apartments at Edgewater Hill Prepared for Edgewater Hill Enterprises, LLC 000 East High Street (CT Route 66) - East Hampton, Connecticut Applicant/Property Owners: Edgewater Hill Enterprises, LLC 138 East High Street East Hampton, CT 06424 Property Info: 000 East High Street Assessor's ID: 10A/85/5C Area: 59.41 +/- Acres Sheets 1 of 25 to 25 of 25" prepared by Boundaries, L.L.C.
6. All erosion and sediment control measures shall be inspected at least weekly while construction is ongoing, and after every storm event resulting in precipitation greater than one-tenth (0.10") of one (1") inch and repaired and maintained as necessary.
7. Unless notification otherwise is provided in writing to the East Hampton Wetland Enforcement Officer and East Hampton Zoning Enforcement Officer, Stephen J. Motto of 267 Hog Hill Road, East Hampton, Connecticut 06424 (Office Address: 138 East High Street, East Hampton, Connecticut 06424) Telephone: (860) 267-6822 Cell Phone: (860) 398-0325, e-mail: [stephen.motto@dreamdevelopersct.com](mailto:stephen.motto@dreamdevelopersct.com) shall be the designated representative of the Applicant responsible for the implementation of the erosion and sediment control plan for the project. All erosion and sediment control measures shall be inspected and maintained and/or repaired, as necessary, on a weekly basis during the construction and stabilization periods and after each storm occurrence meeting the threshold specified above.
8. Throughout construction, the Applicant shall install and maintain inlet sediment control devices in accordance with the Erosion Control Narrative in the catch basins delineated on the Erosion Control Plan in order to insure that no sediments are introduced into any stormwater collected and discharged from the drainage system.
9. Throughout construction, and until the site is fully stabilized, the Applicant shall maintain the existing turbidity curtain at the pond outlet of the pond located on the easterly side of Edgewater Circle and shall further maintain the existing turbidity curtain at the stormwater outlet to Lake Pocotopaug.
10. During the stabilization period, any erosion which occurs shall be immediately repaired by the Applicant, re-seeded with the seeding mixes set forth in the Erosion Control Narrative, and re-stabilized.
11. At such time as stabilization has been achieved and certification thereof received from the East Hampton Wetlands Enforcement Officer and the East Hampton Zoning Enforcement Officer, inlet control devices, hay bales, silt fence and turbidity curtains shall be removed.

In addition, the temporary sediment traps shall be graded, loamed and seeded in accordance with the Grading Plan for the project and the Erosion Control Narrative.

12. If any erosion and sediment control measure fails, or is not installed or maintained in accordance with this Narrative, the Plan, the directives of the East Hampton Wetlands Enforcement Officer, the directives of the East Hampton Zoning Enforcement Officer and/or the recommendation of Steven Trinkaus, third party consultant, the Applicant, or its successors, shall be required to cease all development activities on the project until such time as said erosion and sediment control measures have been installed in accordance with this Narrative, the Plan and the directives of the East Hampton Wetlands Enforcement Officer, the East Hampton Zoning Enforcement Officer and/or Steven Trinkaus and approval of the same has been certified by the East Hampton Wetlands Enforcement Officer, the East Hampton Zoning Enforcement Officer and/or Steven Trinkaus, in writing.

### **CONSTRUCTION SEQUENCING:**

#### **(a) Site Improvements.**

1. Prior to the commencement of construction activities, the Applicant shall install silt fence backed by staked haybales along the downgradient periphery of the project area in the location delineated on the Erosion Control Plan.
2. The Applicant shall install the anti-tracking pad in accordance with the Anti-Tracking Pad Detail as depicted on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Erosion and Sedimentation Control Notes and Details' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: As Noted Date: December 2020 Job I.D. No. 20-2853 Sheet No. 19/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/www.boundariesllc.net".
3. Upon the installation of erosion control measures, the Applicant shall contact the East Hampton Wetlands Enforcement Officer, the East Hampton Zoning Enforcement Officer and Steven Trinkaus to perform an inspection of the installation of said erosion control measures. In no event shall construction activities with respect to the construction of improvements for the Salt Pond Apartments at Edgewater Hill be commenced until such time as the East Hampton Wetlands Enforcement Officer, the East Hampton Zoning Enforcement Officer and Steven Trinkaus have inspected and approved the installation of erosion control measures.
4. Upon certification of the installation of erosion control measures, the Applicant shall grub the location for the installation of site improvements in conjunction with the construction of the Salt Pond Apartments at Edgewater Hill in accordance with the phasing requirements as delineated on the Erosion Control Plan. Any vegetation, including stumps, removed from the area shall either be (i) ground in

place or (ii) disposed of in a location approved in advance by the East Hampton Wetlands Enforcement Officer and the East Hampton Zoning Enforcement Officer. No construction debris shall be deposited in any area regulated pursuant to the regulations promulgated by the Town of East Hampton Inland Wetlands and Watercourses Commission. In addition, no construction debris or stumps shall be buried on the project site.

5. The Applicant shall install the temporary haul road from the existing southerly terminus of Edgewater Circle (in the Neighborhood at Edgewater Hill) in order to access the development site for the Salt Pond Apartments at Edgewater Hill in accordance with the Site Logistics Plan, including the construction of Temporary Sediment Trap 3 located on the northerly side of the temporary haul road in the location delineated on the Site Logistics Plan. In conjunction with the development of the temporary haul road, the Applicant shall install a continuous line of wood chip berm at the down gradient limits of grading as depicted on the Site Logistics Plan as well as the installation of water bars with haybale check dams at outlets in the location depicted on the Site Logistics Plan.
6. Any surface soil and subsoil removed from the construction area shall be stored in a surface soil stockpile in the location delineated on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Site Logistics Plan' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: As Noted Date: December 2020 Job I.D. No. 20-2853 Sheet No. 17/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/[www.boundariesllc.net](http://www.boundariesllc.net)" (the "Site Logistics Plan"). Since the development of the Salt Pond Apartments at Edgewater Hill results in a net export of fill, the surface soil export from the Project shall remain stockpiled in the surface soil stockpile location for use in future phases of the development of the Edgewater Hill Mixed Use Lifestyle Community. The surface soil stockpile shall be stabilized by installing a single row of silt fence around the stockpile location. The stockpile shall be constructed at a slope not to exceed 3:1 and shall be stabilized by seeding with a perennial ryegrass mix and mulch. The perennial ryegrass mix shall be applied at a rate of 40 pounds per acre. Mulch shall be applied at the rate of 80 pounds per 1,000 square feet and shall be spread by hand or with a mulch blower.
7. The temporary sedimentation traps shall be excavated and rough shaped and utilized as temporary sedimentation basins throughout the duration of construction of the Salt Pond Apartments at Edgewater Hill. At such time as any temporary sedimentation trap is filled to more than 50 percent of its available wet storage area, sediments shall be removed from the temporary sediment traps and placed outside of the upland review area or removed from the site.
8. Construction of the Salt Pond Apartments at Edgewater Hill shall thereafter proceed sequentially in accordance with the Erosion Control Narrative.

9. Once all disturbed areas have been thoroughly stabilized, all erosion control devices shall be removed.
10. It is anticipated that construction activities in conjunction with the development of the Salt Pond Apartments at Edgewater Hill will commence in the late winter or early spring of 2021 and be completed within an eighteen (18) month period.

### **MAINTENANCE REQUIREMENTS**

1. As delineated in the General Procedures section of this Narrative, the Applicant shall, during construction of the project, be responsible for inspecting all erosion control measures installed in the active development phase of the project on a twice weekly basis and after each storm event resulting in the deposition of in excess of 0.10" of precipitation.
2. At any time that sediment reaches one-half of the height of the silt fence, wood chip berms or water bars, the sediment shall be removed to the surface soil stockpile location.
3. Temporary sedimentation traps shall be inspected in accordance with the inspection schedule required pursuant to the General Procedures section of this Narrative. At such time as temporary sedimentation traps are filled to 50% of their capacity, excavation equipment shall be introduced into the temporary sediment traps and all collected sediment shall be excavated and removed from the sedimentation traps to restore the temporary sedimentation traps to their designed capacity. Removed sediment shall be stored in the temporary surface soil stockpile location.
4. Check dams and water bars shall be inspected in accordance with the inspection schedule required pursuant to the requirements of the General Procedures section of this Narrative and cleaned and repaired as necessary in order to insure their functional utility.
5. Inlet sediment control devices shall be inspected weekly and after every storm event resulting in more than 0.10" of precipitation and cleaned as necessary. If any inspection discloses any breach in an inlet sediment control device, the inlet sediment control device shall be replaced immediately.

### **PERMANENT MAINTENANCE SCHEDULE**

1. All parking areas, roadways, sidewalks, driveways and other impervious areas (other than rooftops) shall be swept clean of sand, litter and other possible pollutants twice each year, once between November 14 and December 15 (after leaf fall has concluded) and once during the month of April (after the possibility of further sanding has ended). All material accumulated as a result of the sweeping activities shall be disposed of in accordance with law.
2. The Applicant shall utilize a sand/salt mix of 80/20 for winter roadway, parking lot and sidewalk treatments.

3. All catch basin sumps shall be cleaned at least once per year during the period April 15 and May 30. All material cleaned from catch basin sumps shall be disposed of in accordance with law.
4. A monthly inspection of all stormwater structures installed within the project, including the water quality forebay and the stormwater detention basins, and outfalls, shall be conducted for floating debris or surface debris. Any floating or surface debris encountered shall be removed and properly disposed of.
5. Except during the grow-in period, each water quality forebay shall be inspected once per year. At such time as accumulated sediments attain a depth of 12", accumulated sediments shall be removed and disposed of in accordance with law. The water quality forebays and detention basins shall be mowed once each year at the conclusion of the growing season.
6. The Applicant shall be responsible for compliance with all of the terms and provisions of this Narrative, including adherence to the maintenance requirements contained in this section hereof.
7. During the first two (2) years subsequent to the completion of the project, the Applicant shall inspect all downgradient discharge areas within the project for channelization subsequent to any storm event resulting in the deposition of in excess of 1" of rainfall. If channelization is occurring, the Applicant shall immediately retain the services of a certified soil and erosion control specialist in order to design remedial measures required to diffuse the flow causing the channelization and shall forthwith implement the remedial measures designed by the certified soil and erosion control specialist.

#### **DELINEATION OF NO FEASIBLE AND PRUDENT ALTERNATIVE**

As defined in Connecticut General Statutes §22a-38(17) "feasible" means able to be constructed or implemented consistent with sound engineering principles. As defined in §22a-38(18) of the Connecticut General Statutes, "prudent" means economically or otherwise reasonable in light of the social benefits to be derived from the proposed regulated activity provided cost may be considered in deciding what is prudent and further provided a mere showing of expense will not necessarily show an alternative is imprudent.

Feasible and prudent alternatives need only be demonstrated to the municipal inland wetlands and watercourses commission in situations in which the proposed regulated activity is reasonably likely to have a significant adverse impact on wetland and watercourse resources. In formulating the methodology for the development of the Master Plan for Edgewater Hill, great care was taken by the Applicants' engineer and land planners to avoid direct impacts to significant wetlands and watercourses. This methodology was incorporated into the Master Plan designed for Edgewater Hill and has been incorporated into the engineering design of the phase of the Master Plan development which incorporates the Salt Pond Apartments at Edgewater Hill which is being submitted for consideration. While the East Hampton Inland Wetlands and Watercourses

Commission is not required to make a finding of “no feasible and prudent alternative” unless it makes a determination that the activities proposed in conjunction with the development of the Salt Pond Apartments at Edgewater Hill constitutes significant activities, the following is offered in support of the design philosophy which governed the design of this environmentally sensitive approach to the proposed development of Edgewater Hill in general and the Salt Pond Apartments at Edgewater Hill in particular.

As stated in the introductory section of this Narrative, the proposed Salt Pond Apartments at Edgewater Hill are being developed in accordance with the Master Plan which was reviewed by the Town of East Hampton Inland Wetlands and Watercourses Commission and the Town of East Hampton Planning and Zoning Commission in 2012. As depicted on the Master Plan, the development of Edgewater Circle and its associated grading which provides a continuous loop road system within Edgewater Hill necessary for public safety and convenience, requires the elimination of a small isolated pocket of wetlands delineated as “Wetland H” in the project wetland resources and impact analysis prepared by Land-Tech Consultants, Inc. for presentation to the Town of East Hampton Inland Wetlands and Watercourses Commission in conjunction with the Master Plan approval. As stated previously, the “Natural Resources Evaluation Report” dated January 6, 2012 prepared by Land-Tech Consultants, Inc. describes Wetland H as an isolated hillside seep wetland which has limited functionality due to its small size and hillside landscape position. The Inland Wetlands and Watercourses Act, and the regulations promulgated thereunder by the East Hampton Inland Wetlands and Watercourses Commission, contemplates that a municipal inland wetlands and watercourses commission must perform a balancing function in evaluating each application for a permit to conduct regulated activities in inland wetlands and watercourses and upland review areas adjacent to inland wetlands and watercourses. In doing so, the municipal wetlands commission must balance the preservation of valuable inland wetland and watercourse resources against the need for economic development both within the municipality, in particular, and the State of Connecticut, in general. This task necessarily involves a prioritization of the value of wetland and watercourse resources which may be impacted by any particular development initiative.

In the instant situation, the natural resource evaluation report prepared by Land-Tech Consultants, Inc. has determined that Wetland H is a wetland resource of limited functional value due to (i) its location on the landscape and (ii) its limited size and function. As indicated previously, the Master Plan for Edgewater Hill contemplated the elimination of this wetland resource. The theme for development for the Edgewater Hill Project, incorporated into the Master Plan approval, requires a loop road throughout the project in order to provide two means of access to all development within the project. In locating Edgewater Circle, both the master planners and the project engineers have located Edgewater Circle, in the vicinity of the proposed development, further away from the more valuable inland wetland and watercourse resources located northeasterly of the proposed development area. The preservation of these more valuable resources has necessitated the elimination of the isolated wetland pocket delineated by the Wetland Series H Flags.

With respect to the protection of additional inland wetland and watercourse resources located both on the project site and exterior thereto, including Lake Pocotopaug, the project

engineer has incorporated a detailed stormwater management and water quality system into the project vernacular in order to ensure that a highly renovated stormwater is released to the site wetlands (including the pond located easterly of Edgewater Circle), and thereafter, through a series of drainage basins, swales and structures, to Lake Pocotopaug. As indicated on the Overall Layout Plan, a significant portion of the project site is located within the 200 foot upland review area required for all wetlands draining to Lake Pocotopaug. In order to attain consistency between the Master Plan approval for Edgewater Hill, including the entire development scheme for the mixed use lifestyle community project, and the protection of the inland wetland and watercourse resources located on and in proximity to the project site, the project design engineer has incorporated a sophisticated stormwater management system for the project as depicted on a plan entitled "Salt Pond Apartments at Edgewater Hill 'Stormwater Management Plan' Prepared for Edgewater Hill Enterprises, LLC 000 East High Street - East Hampton, Connecticut Scale: 1"=30' Date: December 2020 Job I.D. No. 20-2853 Sheet No. 10/25 Boundaries LLC 179 Pachaug River Drive, Griswold, CT 06351 T 860.376.2006/[www.boundariesllc.net](http://www.boundariesllc.net)". The stormwater management and renovation system incorporated into that design has been formulated in order to ensure that the quality and peak volume of stormwater released from the developed site to the inland wetland and watercourse resources both on and in proximity to the project site will be of such quality and character as to be consistent with the preservation of the ecological quality of those resources.