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WETLAND BOUNDARIES › POND & LAKE MANAGEMENT › CONSTRUCTION FEASIBILITY CONSULTATIONS › ENVIRONMENTAL STUDIES

To: Town of Bethel Inland Wetlands Commission

From: Steven Danzer PhD

Date: November 21, 2023

Re: 7 Rockwell Road

At the request of the intervenor I have reviewed the report by JMM Wetland Consulting Services, LLC dated 10/15/23, the Staff Report by David McCollum dated 11/20/23 and related documents posted to date regarding 7 Rockwell Road.

I offer the following comments for consideration by the Inland Wetlands Commission.

1. Standards for an Acceptable Restoration Plan

The Town of Bethel Regulations under Appendix B – Materials Required For Permit Applications (item10) stipulates that applications should include the following typically in map format:

”A site plan, based upon a monumented Class A-2 survey and drawn by a Connecticut-licensed professional engineer or surveyor or architect, showing the proposed activity and existing and proposed conditions in relation to wetlands and watercourses and identifying any further activities associated with, or reasonably related to, the proposed regulated activity which are made inevitable by the proposed regulated activity and which may have an impact on wetlands or watercourses; “

No such site plan was submitted.

A survey site plan would be necessary to locate and depict the ongoing and proposed regulated activities with regard to wetland and property boundaries.

Equally important, a survey site plan is necessary to identify any current encroachments on the adjacent property owned by the intervenor, and to prevent any future encroachments.

The sketch within the JMM report is insufficient as it fails to provide the above in a precise and accurate manner.

2. Scope of Regulated Activities

My understanding based upon site observation and conversations with the intervenor is that rocks were removed from the bed of the river and then placed along the riversides to harden the riverbank.

Besides from being unauthorized, this activity is harmful to both the riparian habitat and the underwater benthic habitat.

Removal of these rocks also negatively alters the natural flow of water as the rocks are no longer dissipating flow energy, leading to more erosive flows downstream.

The JMM report does not address this, and limits the report to only one portion of the site located on the eastern side of the river.

Thank you for the opportunity to comment.

Respectfully submitted,

Signed,



Steven Danzer Ph.D.

- Soil Scientist, Senior Professional Wetland Scientist, Arborist
 - Nationally certified by the Soil Science Society of America (#353463).
 - Registered with the Society of Soil Scientists of Southern New England.
 - Certified PWS #1321 by the Society of Wetland Scientists
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