

## Hurley, Sarah

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**From:** Mark Winne [REDACTED]  
**Sent:** Thursday, August 19, 2021 12:04 AM  
**To:** Hurley, Sarah  
**Cc:** Home  
**Subject:** Comments: Bantam Lake Watershed-Based Plan Project

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*Ms. Hurley - If I have the time and opportunity, I hope to revise and update these comments later today, but as I am travelling, I wanted to get something on the record in the event I am unable to reconnect and submit updated comments.*

19 August 2021

Ms. Sarah Hurley  
CT DEEP

This letter is to provide comments on the Bantam Lake Watershed-Based Plan Project.

My comments are primarily from the perspective of an owner/user of land along the shoreline of Bantam Lake and the role/responsibilities of all parties interested in being responsible stewards of the Bantam Lake watershed.

In these comments, I hope to call attention to the need to have improved tools, processes and regulations to guide all Bantam Lake stakeholders - homeowners, contractors, engineers, and local governing boards - to enhance and better ensure that new development or redevelopment does not negatively impact the lake health. I reviewed many of the materials associated with the watershed plan and was pleased to see the attention focused on "Neighborhood Sites" on the west side of the lake, however, I believe greater attention should be directed at maintaining and enhancing shoreline buffers along the entire lake – particularly with regard to major alterations or redevelopment of all shoreside properties.

As a matter of introduction, my family shares a small camp/cottage on Marsh Point on a small lot (~50' x 200') that is leased from the White Memorial Foundation. We bought the camp in 2013, the original camp had been torn down and reconstructed in ~2007. Our first couple years were spent getting acquainted with the property and understanding where best to focus our energy and resources to best maintain and enhance the property.

We quickly became aware of the significant water run-off and resultant erosion issues. It became apparent we needed to better manage the runoff down the steep hillside. Despite a well-established lawn, there was evidence of steady, incremental erosion throughout the steep hillside, especially during and following large storm events. Because of the narrow lots and steep hillsides on many of the White Memorial lots, most of the runoff is directed away from the structures and towards the lot lines resulting in soggy boggy swales and nutrient-laden runoff reaching the lake during and following storm events.

After unsuccessful attempts to address the problem with French curtain drains,, we engaged an areal contractor to design a rain garden that could manage the run-off during peak storm events and to enhance areas closer to the lake edge with strategically located native plantings beds to create a buffer zone to further reduce the erosion and filter any remaining run-off into the lake. We were amazed at the results and how much drier the areas along the shoreline became as a result of these improvements. As I indicated earlier, I am a layman and not an expert by any means, but it

seems rather intuitive that a well-designed rain garden combined with shoreline buffer plantings are much more effective at reducing nutrient loading associated with run-off than either a green lawn down to the water's edge or the swale and water's edge detention pool/basin common in many "engineered" solutions.

We were steered in this direction by our experience visiting several lakes in Maine and our awareness of the regulations that had been implemented across all of Maine to enhance shoreline buffer zones by better managing and controlling change along lake shorelines throughout the state. The following links detail many of the regulations and programs that have proven successful in Maine: (<https://www.maine.gov/dep/land/slz/index.html> & <https://www.maine.gov/dep/land/watershed/bufa.html>). While a statewide program like Maine's may not be appropriate for Connecticut, with the right support from CTDEEP and EPA, many aspects could be implemented effectively at the Litchfield and Morris Conservation and Inland Wetlands Commission levels. I am skeptical that educational materials and "homeowner encouragement" alone will yield meaningful changes along the shoreline; rather a structured, regulatory framework is necessary to manage activity with the shoreline buffer zones in order to realize meaningful results. Buffer zones not only improve flora and reduce impact to the TMDL of the lake, but improve habitat for fish and fauna. I would imagine that when these regulations were first implemented in Maine there was significant resistance, however, I would likewise imagine there would be a significant revolt if there was ever an effort to roll back the regulatory framework that is protecting the many pristine lakes and shorelines throughout the state.

I am hopeful that when the Watershed-Based Plan Project is finalized it will provide greater support, guidance and structure at a local level such that at some point in the near future all stakeholders will be engaged and committed to ensuring that the majority of any stretch of the shoreline is protected by secure buffer zones designed to reduce run-off and nutrient loading of the lake.

Respectfully,

Mark Winne

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