



December 21, 2016

Mr. Robert Maquat, Chairman
Planning and Zoning Commission
Town of Easton
225 Center Road
Easton, CT 06612

RE: Saddle Ridge Developers, LLC's Application for High Density Development at Sport Hill Road, Silver Hill Road, Cedar Hill Road and Westport Road, Easton, CT

Dear Mr. Maquat,

The Connecticut Fund for the Environment ("CFE") respectfully submits the following comments in opposition to Saddle Ridge Developers, LLC's ("Saddle Ridge") current application before the Easton Planning and Zoning Commission ("Commission") seeking to amend Easton's current zoning regulations in order to undertake high-density development within a public drinking water supply watershed. CFE is a state and region-wide nonprofit devoted to environmental protection and advocacy that represents approximately 5,000 member households throughout both Connecticut and New York. Since its founding in 1978, CFE has placed particular emphasis on the protection of Connecticut's fragile water resources, an issue that has grown increasingly imperative in the face of increased development amid Connecticut's ongoing drought.¹ The Commission is currently presented with an application for a housing development that is in discord with prevailing state policies concerning the protection of public drinking water resources. In order to further effectuate those policies—at a critical time where state water supplies are increasingly threatened—CFE contends that the Commission should deny Saddle Ridge's current application and ensure a future for Easton and the region that includes a clean and sustainable source of drinking water. Given that approximately 600,000 customers rely on the affected watershed for potable water and many more in Easton draw water from private wells, denial of Saddle Ridge's application is of paramount importance.

CFE joins in the concerns of the Coalition to Save Easton and Citizens for Easton that approval of Saddle Ridge's proposed zoning amendments and development plan will severely jeopardize public water resources by permitting residential development at a density much higher than that which ensures adequate protection of the water supply.² In its most recent application, Saddle Ridge proposes development at a density rate of approximately one housing unit per 1.31

¹ "Connecticut Drought Declarations," STATE OF CONNECTICUT WATER STATUS (last updated Oct. 26, 2016) available at <http://www.ct.gov/waterstatus/site/default.asp> (last visited Dec. 21, 2016); Gregory B. Hladky, "Rainfall Shortage Getting Worse: Nearly Half of Connecticut Now Considered in 'Extreme Drought'," *Hartford Courant* (Nov. 18, 2016) available at <http://www.courant.com/news/connecticut/hc-extreme-ct-drought-20161117-story.html> (last visited Dec. 21, 2016).

² "Saddle Ridge," CITIZENS FOR EASTON: WORKING TO PROTECT THE BEAUTY AND CHARACTER OF EASTON, available at <https://citizensforeaston.org/maps-of-open-space-in-easton/> (last visited Dec. 21, 2016).

acres, exclusive of wetlands.³ In order to properly safeguard drinking water supplies, however, the commonly accepted rate is that of one housing unit per two acres, exclusive of wetlands.⁴ Adhering to the two acre standard is necessary to ensure the best available protection for water resources. As such, development at the rate requested by Saddle Ridge would put a major source of public drinking water at peril from ground and surface water pollution stemming from inappropriate development.

The longstanding public policy of the State of Connecticut is to protect public water supplies and to discourage high impact development in public water supply watersheds. It is explicit state policy to “preserve and protect water supply watershed lands...[and] to prevent contamination of water supply sources or reduction in the availability of future water supplies....”⁵ Likewise, the Legislature has charged municipal zoning boards, including the Commission, to consider “the protection of existing and potential public surface and ground drinking water supplies”⁶ in carrying out their official duties. Similarly, the state Office of Policy and Management’s State Conservation and Development Plan for 2013-2018 places prime emphasis on the need to “protect and ensure the integrity of environmental assets critical to public health and safety.”⁷ Saddle Ridge’s proposed development is akin to the proverbial pig that finds itself in the parlor rather than the barnyard: a thing that is all well and good in and of itself but simply located in the wrong place.⁸ As such, the Commission should take into account the invaluable worth of a clean public water supply for the current and future residents of Easton and greater Fairfield County and reject Saddle Ridge’s proposal.

Respectfully submitted,



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³ Michael S. Klein, “Report of Environmental Planning Services, LLC Re: Saddle Ridge Developers, LLC Sport Hill, Silver Hill, Cedar Hill and Westport Roads Easton, CT,” 2 (Dec. 12, 2016).

⁴ Connecticut Department of Environmental Protection, “Carrying Capacity of Public Supply Watersheds,” (Mar. 1990).

⁵ Connecticut General Statutes § 22a-380.

⁶ Connecticut General Statutes §§ 8-2(a) and 8-23(d).

⁷ Connecticut Office of Policy and Management, “Conservation & Development Policies: The Plan for Connecticut,” 23 (May 15, 2013) available at http://www.ct.gov/opm/lib/opm/igp/org/cdupdate/2013-2018_cd_plan.pdf (last visited Dec. 21, 2016).

⁸ See *Village of Euclid v. Ambler Realty, Co.*, 272 U.S. 365, 388, 47 S. Ct. 114, 71 L. Ed. 303 (1926).

