

10/17/2024

To: -Doug Mclean, Director of Planning and Development, Town of Coventry
-Town of Coventry Planning Commission

I have concerns over the two major changes made to the Coventry Crossing development plan shown at the preliminary plan stage.

The first concern is over installing a privately managed wastewater treatment facility in the field in lieu of connecting the development into the public sewer system. Whenever there is a large source of wastewater, the best choice is to use a public system. Only when there is not a readily available public sewer system would a privately managed onsite system be the next best choice. Of course, the engineered onsite system would do the job, but there is some inherent risk in having a large private system. The management of the system requires constant attention and maintenance. The public system is managed by a public entity as their only job. Additionally, the Kent County Water Authority letter of September 24, 2024 identifies a concern with the environmental impact of this large private system. The proposed system is identified in the letter to be in the Mishnock Wellhead Protection Area. Looking at the letter's enclosure, the specific location of the proposed system on the site may not be located within the protection area, but an area of the site is certainly within the wellhead protection area. Being close to the protection area is concerning for the potential impact. Also, the developer, told me that connecting the development to the public system is more expensive than installing the on-site system. I think the short and long term costs, as well as the environmental impact, should be reviewed by the Coventry Sewer Authority and Planning Commission in order to make an informed decision as to which is the better choice. The use of the available public system was a selling point of the Master Plan approval for this large development. This change is a step backward.

My second concern is related to the newly designed storm water retention ponds and compensation area in the northwest corner of the development shown on Sheets C-2.3 and C-3.3 of the Preliminary Plan Set. At first glance, it visually looks good for the abutting neighbors along Wood Cove Drive as it is now an open area where the previous plan had a road with houses parallel to Wood Cove Drive. What a closer look shows is the elevation of the new houses has been

raised. The first retention pond (BMP 2) will be excavated to an elevation that is a few feet below the house elevation and the adjacent compensation area is further excavated to a slightly lower elevation to catch any water that overflows the first retention pond. This lower elevation of the compensation area is only approximately 1-1/2 feet above the observed high water elevation found when test sites were excavated in the area. In addition, the storm drains shown on Sheet C-3.3 direct water from approximately one third of the development area into the adjacent retention pond with overflow into the compensation area. The existing retention pond that contains the storm water from Wisteria Drive is also shown to drain into the adjacent compensation area. This means that during rainy times of the year the proposed compensation area, which will be wet, will have very little tolerance to accept more water directed from the storm drains of the development and from Wisteria Drive. The compensation area extends approximately to the edge of the no cut zone (40 feet) from the adjacent properties. The current landscape in this area is known to be wet for extended times during the year, with the adjacent homes already having water problems. The existing trees in the proposed compensation area are to be removed eliminating a better water absorber than the proposed grass. The added water purposely directed to this area could potentially aggravate a known problem to the adjacent properties.

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