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October 1, 2020

Clifford S. Thier, Chair
Town of Avon Inland Wetlands Commission
Town Hall
60 West Main Street
Avon, CT 06001

Re: **Application of Blue Fox Run Golf Course, LLC (No. 768) for a Wetlands Map Amendment at Property Located at 65 Nod Road, 117 Nod Road, and 231 Nod Road (“Property”), Avon, Connecticut (the “Application”).**

Dear Chair Thier and Members of the Inland Wetlands Commission:

This firm represents Nod Road Preservation, Inc. (“NRP”). This letter is written to inform you that NRP is filing a Petition for Intervention, as allowed under Section 22a-19 of the Connecticut General Statutes, in the above-referenced Application. Enclosed is NRP’s verified Petition for Intervention and attached exhibits. Also attached is a memorandum depicting the FEMA 500 year flood-line boundary on the Property.

The Application proposes eliminating significant acreage currently regulated by the Town as floodplain and/or alluvial soils. As explained in NRP’s Petition, the methodology used to delineate wetlands resources does not accurately do so. NRP respectfully asks that the Commission consider feasible and prudent alternatives that properly delineate and protect wetlands resources that exist on the subject Property.

NRP looks forward to the opportunity to address the Commission at the October 6, 2020 public hearing. Thank you for your consideration.

Sincerely,



Brian R. Smith

Copy to: John McCahill, Wetlands Agent, Town of Avon

APPLICATION OF BLUE FOX RUN : STATE OF CONNECTICUT
GOLF COURSE, LLC :
 : BEFORE THE INLAND WETLANDS
 : COMMISSION OF THE TOWN OF AVON
APPLICATION NO. 768 :
 :
 :
 : SEPTEMBER 29, 2020

VERIFIED PETITION FOR INTERVENTION
UNDER GENERAL STATUTES SECTION 22a-19(a)

Nod Road Preservation Inc. (“NRP”), a 501(c)(3) non-profit corporation, P.O. Box #233, Avon, CT 06001, hereby intervenes in the above-captioned matter pursuant to Connecticut General Statutes Section 22a-19(a), and represents that:

1 . NRP’s mission is to protect the natural beauty, country peacefulness, and authentic charm associated with Nod Road and the greater Farmington Valley through responsible land management.

2. The Connecticut Environmental Protection Act of 1971 provides in pertinent part at General Statutes Section 22a-19(a) that

In any administrative, . . . proceeding, and in any judicial review thereof made available by law, . . . any person, . . . corporation . . . or other legal entity may intervene as a party on the filing of a verified pleading asserting that the proceeding or action for judicial review involves conduct which has, or which is reasonably likely to have, the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state.

3. The Inland Wetlands Commission of the Town of Avon (the “Commission”), is the town agency authorized in Avon to administer the statutory provisions regulating the use and delineation of inland wetlands and watercourses pursuant to General Statutes Section 22a-36, et seq., and of its own duly enacted Inland Wetlands and Watercourses Regulations of the Town of Avon (the “Regulations”).

4. The Regulations provide that wetlands and watercourses are an “indispensable and irreplaceable but fragile natural resource” in the State, and that “unregulated activity has had, and will continue to have, a significant adverse impact on the environment and ecology of the State of Connecticut and has and will continue to imperil the quality of the environment thus adversely affecting the ecological, scenic, historic and recreational values and benefits of the State for its citizens now and forever.” See Regulations, Section 1.1.

5. The Regulations further provide that the “preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the State.” See Regulations, Section 1.1.

6. An application and supporting materials (the “Application”) have been submitted by Blue Fox Run Golf Course, LLC (“Applicant”), along with certain plans and studies prepared by various consultants for a proposed wetlands map amendment on property located at 65 Nod Road, 117 Nod Road, and 231 Nod Road comprising approximately 230.4 acres (collectively, the “Property”). The Property is owned by the Applicant, Nod Road Properties, LLC, and Cornor Properties, LLC. The Application proposes removing from regulation much of the Property that is currently mapped as wetlands.

7. It does not appear that the Application materials indicate the precise amount of acreage proposed to be removed from regulation and subject to unregulated development. However,

a comparison of the Town's current mapping of wetlands on the 230.4-acre Property and the wetlands proposed for delineation in the Application shows a significant amount of land that the Applicant proposes removing from regulation. *Compare Exhibit A* (Map Entitled "Wetland Comparison," dated December 14, 2018) *with Exhibit B* (Map "Potential Golf Course Modifications/Development," August 7, 2020).

8. By removing currently mapped wetlands, the Application seeks to facilitate development on the Property.

9. In 2018, the Applicant submitted an earlier application, Application No. 759 (the "2018 Application"), with this Commission to amend the Town's wetlands map for the same Property at issue in this Application in order to facilitate residential development (upwards of 100 residential units).

10. In the 2018 Application, the Applicant, through its consultants, represented to the Commission that "[t]he precise extent of the moderately well to excessively drained alluvial soils **cannot be determined** due to the alterations of the soil profile that have occurred in the past." *See Exhibit C* (emphasis added). Due to the inability to locate some alluvial soils, the Applicant proposed utilizing the FEMA 100-year floodplain line to re-delineate wetlands on the Property.

11. Upon the advice of its counsel, the Commission granted NRP intervening party status under Conn. Gen. Stat. Section 22a-19 in the proceeding regarding the 2018 Application.

12. The Connecticut Superior Court (Berger, J.) has found that intervention under Section 22a-19 is appropriate in proceedings which involve applications to change wetlands mapping, including that proposed in the 2018 Application, because such activity involves "conduct" for purposes of the statute. *See Exhibit D*.

13. On April 2, 2019, the Commission denied the 2019 Application.

14. In this Application, the Applicant again seeks to delineate wetlands on the Property using the FEMA 100 year floodplain line, the methodology which was already considered and rejected by the Commission.

15. A public hearing to consider the Application is scheduled for October 6, 2020 and this Commission has been asked by the Applicant to approve its application to change the delineation of wetlands and watercourses on the Property.

16. The Application as proposed involves conduct which is reasonably likely to have the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the State for the following reasons:

A. The Application will result in direct and indirect impacts to wetland and watercourse resources and will likely adversely affect wetlands and watercourses.

Inadequate consideration has been given to preservation of the existing wetland and watercourse resources.

B. The Application proposes significant amendments to the delineation of wetlands and watercourses on the Property but does not accurately delineate wetlands.

C. The Applicant proposes using improper methodology to map wetlands (i.e., FEMA's 100 year floodplain line), which has already been rejected by the Commission. The Application uses an outdated and under-inclusive methodology (the FEMA 100 precautionary flood-line) to identify floodplain and alluvial soils, which are recognized as "wetlands" under Section 22a-38(15) of the General Statutes. Using current accepted and more conservative methodology (the FEMA 500 precautionary flood-line) to identify alluvial soils would result in a more accurate delineation of wetlands and would likely delineate more wetlands on the Property than are shown in the Application.

D. Included with the Application is a Map entitled “Potential Golf Course Modifications/Development,” August 7, 2020 (Exhibit B), which shows the possible area for future residential development. The area proposed for development appears to consist of most, if not all, of the Property and is directly in or in the immediate vicinity of areas of the alluvial plain.

E. Accepting the Applicant’s proposed amendment would result in significant portions of the Property now regulated by the Town of Avon as floodplain and/or alluvial soils being reclassified as no longer protected by the Town as a wetland and/or floodplain, and suitable for unregulated development.

F. Removing large swaths of Property from regulation will create serious flooding risks and unreasonably pollute the downstream water quality of the Farmington River, as well as existing plant and other wildlife on the Property and on nearby properties.

G. Removal of large swaths of currently mapped wetlands will create serious health and safety concerns for residents abutting and near the Property, as well as for the residents of the residential development proposed on the Property.

H. The Application does not satisfy the requirements of Sections 3 and 15 of the Regulations.

17. The Commission has jurisdiction over inland wetlands and watercourses in Avon. The facts show that the Commission should exercise its jurisdiction over the environmental issues presented in this Petition and deny or modify the Application.

18. Feasible and prudent alternatives exist, including, but not limited to: (a) using the FEMA 500-year floodplain line to map wetlands; (b) relocating the proposed development beyond wetlands and watercourses and any upland review area; (c) significantly decreasing the size of any proposed development area; or (c) preserving the land in its natural state or for agricultural use.

19. NRP further requests, pursuant to Connecticut General Statutes Section 1-227, that it be given written notice by mail of all hearings and/or meetings, including meetings between the Applicant and Town staff in connection with the proceedings pertaining to the above-captioned matter. Such notice and all correspondence shall be sent to NRP's Counsel at the following address:

Brian R. Smith
Evan J. Seeman
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103

Hartford, CT 06103

WHEREFORE, Nod Road Preservation, Inc. respectfully requests intervention status in this proceeding pursuant to the Environmental Protection Act of 1971 upon the filing of this verified pleading for intervention.

INTERVENOR
NOD ROAD PRESERVATION, INC.

By 
Its President

APPLICATION OF BLUE FOX RUN GOLF
COURSE, LLC

APPLICATION NO. 768

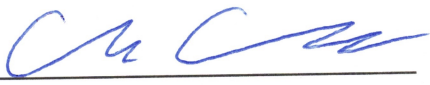
: STATE OF CONNECTICUT
:
: BEFORE THE INLAND WETLANDS
: COMMISSION OF THE TOWN OF AVON
:
:
: SEPTEMBER 29, 2020

VERIFICATION OF PETITION FOR INTERVENTION
UNDER GENERAL STATUTES SECTION 22a-19(a)

I, the undersigned, being duly sworn, depose and say that I have read the foregoing Petition for Intervention, and on behalf of Nod Road Preservation, Inc. I verify that the allegations contained therein are true to the best of my knowledge and belief.

Dated at Avon, Connecticut, this 29 day of September, 2020.

INTERVENOR
NOD ROAD PRESERVATION INC.

By 

Its President

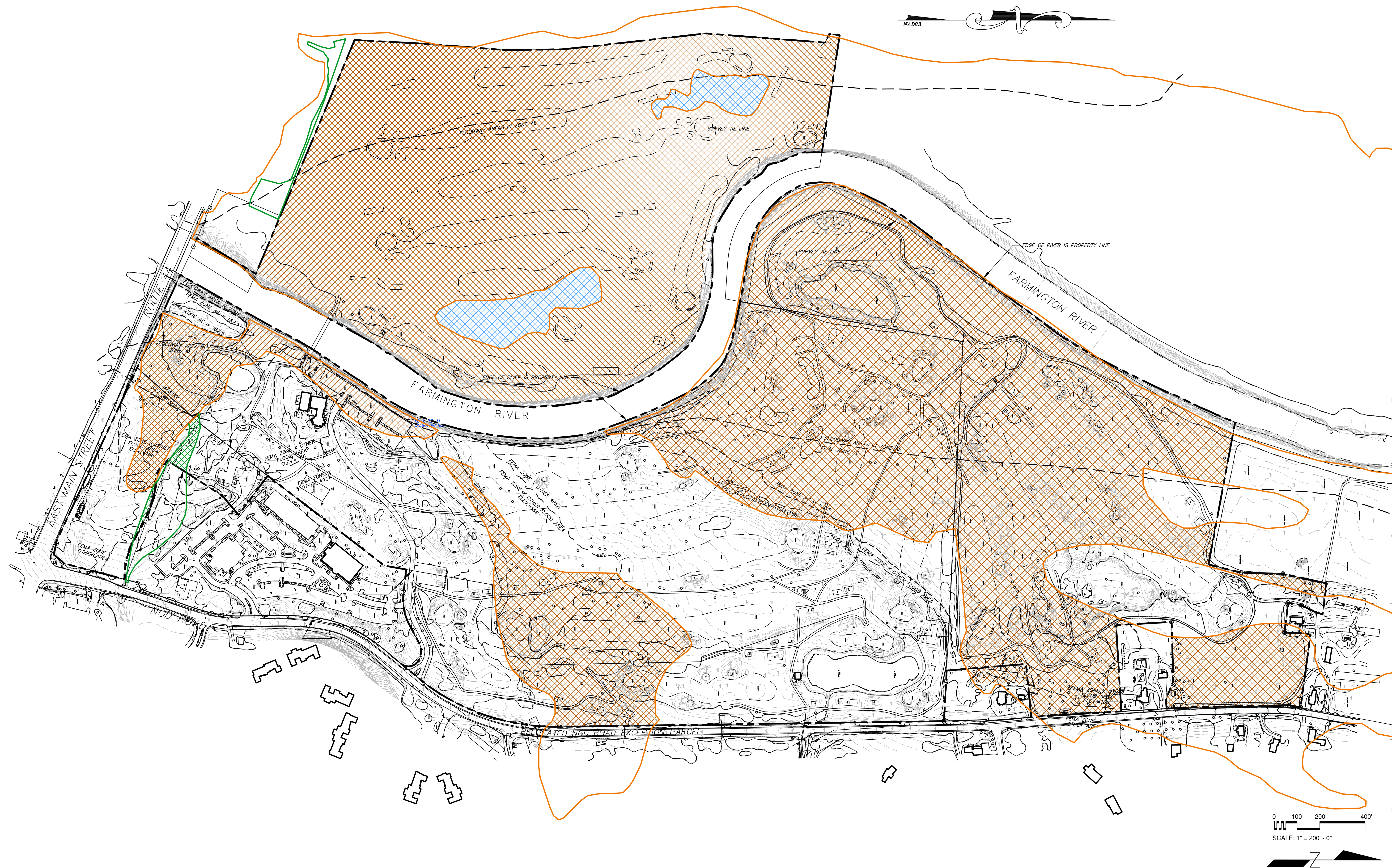
Subscribed and sworn to before me the undersigned this 29 day of September, 2020.



Notary Public: Taylor Murphy
My Commission Expires: 05/31/2024



EXHIBIT A



LEGEND:

	TOWN MAPPING WATERBODIES AND WATERCOURSES
	TOWN MAPPING FLOODPLAIN AND ALLUVIAL SOILS
	TOWN MAPPING FIELD DELINEATED WETLAND

LANDSCAPE ARCHITECT
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PRELIMINARY
NOT FOR CONSTRUCTION

BlueFoxRun
Residences
NOD ROAD
AVON, CT

WETLANDS MAP AMENDMENT
14 DECEMBER 2018

[illegible]

TOWN WETLANDS

3.0

EXHIBIT B

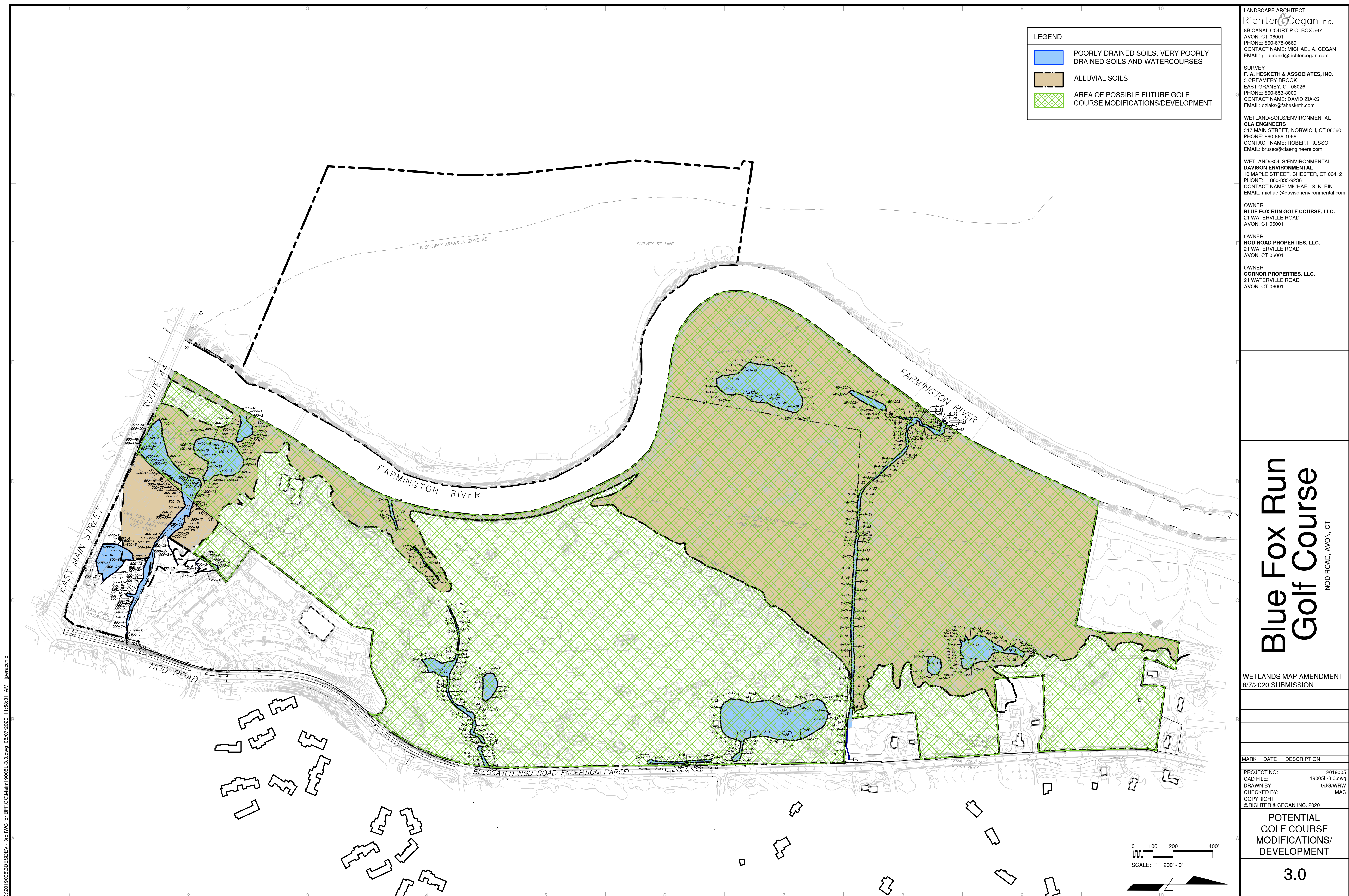


EXHIBIT C



IWC App#758

Biodiversity Studies • Wetland Delineation & Assessment • Habitat Management • GIS Mapping • Permitting • Forestry

November 16, 2018

Anthony Giorgio, Ph.D.
Managing Director
The Keystone Companies, LLC
30 Dorsett Crossing Drive, Suite 600
Simsbury, CT 06070

RECEIVED

NOV 16 2018

RE: Blue Fox Residential Development

Planning Department
Town of Avon

Dear Dr. Giorgio:

I am writing to report the results of recent investigations conducted by this office with respect to the delineation of wetlands and watercourses on a portion of the subject property east of the Farmington River. Specifically, Davison Environmental (DE) has completed the following:

1. Review of DE (and our predecessor company, Environmental Planning Services) files.
2. Review of historic aerial photography.
3. Review of Town of Avon mapping.
4. Review of the USDA, Natural Resources Conservation Service web soil survey.
5. Field investigations.
6. Review of F. A. Hesketh & Associates 4.21.18 (revised through 11.15.18) survey depicting a proposed wetland boundary amendment.
7. Review of CLA Engineers, Inc. 11.14.18 report in support of the boundary amendment.

Wetlands subject to jurisdiction under the CT Inland Wetlands and Watercourses Act and Town of Avon regulations are defined as areas of poorly drained, very poorly drained, floodplain and alluvial soils, as determined by a soil scientist. Watercourses are defined as bogs, swamps, marshes, lakes, ponds, rivers, streams, etc., whether natural or man-made, permanent or intermittent. Accordingly, I walked over the site on October 31, 2018, and examined the soils with a spade and auger. I also reviewed published mapping and photography as noted above. My findings are as follows.

The property is in Avon, on the east side of the Farmington River, north of East Main Street (Rte. 44) and west of Nod Road. The land is currently occupied by portions of the Blue Fox Run Golf Course. Prior to its conversion to golf use, it was under active agriculture since at least 1934, and most likely for many decades before that. The soils have been altered by plowing, drainage, grading, dredging, and filling. The vegetation has also been altered, now consisting primarily of crops and/or turf. In addition, the local hydrology has been altered by drainage and

filling; and the overall hydrology of the lower Farmington River has been substantially altered by upstream flood control projects installed after the 1955 flood.

As a result, delineation of the wetlands at this site requires the exercise of professional judgment. The extent of poorly drained and very poorly drained soils can still be determined based on the presence of redoximorphic features (aka "mottles") and hydrophytic vegetation. However, alluvial soils include all drainage classes from extremely well drained to very poorly drained. The precise extent of the moderately well to excessively drained alluvial soils cannot be determined due to the alterations of the soil profile have occurred in the past. In my judgment, a conservative approach to this problem is to consider all areas subject to flooding during the 100 year return frequency event as having been originally formed by alluvial processes, and thus wetlands by definition under CT statutes.

I recommended this approach to the Avon Inland Wetlands and Watercourses Commission in 1997 and again in 2004, when I delineated the wetlands at the site in conjunction with an application to expand the existing 18 hole course to 27 holes. Copies of my previous reports are attached. This methodology was accepted by the Commission in their deliberations, as documented in the attached minutes from their September 21, 2004 meeting. Robert Russo, the soil scientist for the applicant has also adopted this methodology.

I have reviewed Mr. Russo's report, the flagging of the poorly and very poorly drained soils, and the survey prepared by F.A. Hesketh & Associates. As noted above, I also walked the site and examined the soils. In my professional opinion, the wetland limits flagged in the field and depicted on the survey are substantially correct.

Please feel free to contact me if you have any questions regarding my findings.

Yours truly,



Michael S. Klein
Professional Soil Scientist
Professional Wetland Scientist

cc: W. Ferrigno
W. Richter
D. Ziaks

attach: EPS 12.18.1997 letter to Tim Curren
EPS 9.15.2004 letter to Bruce Hoben
Avon Inland Wetlands Commission 9.21.2004 minutes, pp. 3601-3604

EXHIBIT D

NO: HHD CV19-6110376S : SUPERIOR COURT
BLUE FOX RUN GOLF COURSE, LLC,
ET AL : JUDICIAL DISTRICT
OF HARTFORD
v. : AT HARTFORD, CONNECTICUT
INLAND WETLANDS COMMISSION OF
THE TOWN OF AVON : AUGUST 23, 2019

BEFORE THE HONORABLE MARSHALL K. BERGER, JR., JUDGE

A P P E A R A N C E S :

Representing the Plaintiffs:

ATTORNEY CARL T. LANDOLINA
Fahey & Landolina Attorneys, LLC
487 Spring Street
Windsor Locks, CT 06096

Representing the Defendant:

ATTORNEY KARI L. OLSON
Murtha Cullina LLP
CityPlace One
185 Asylum Street
Hartford, CT 06103

Representing the Interveners:

ATTORNEY BRIAN R. SMITH
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103

Recorded By:
Amanda Kizis

Transcribed By:
Amanda Kizis
Court Recording Monitor
101 Lafayette Street
Hartford, CT 06106

1 THE COURT: Please be seated all. And this is
2 the matter of *Blue Fox Run Golf Course, LLC, versus*
3 *the Inland Wetland Commission of the Town of Avon.*
4 It has a docket number of LND 19-6110376. Would
5 counsel identify themselves for the record, please?

6 ATTY. LANDOLINA: Yes. Good morning, Your
7 Honor. For the record, Attorney Carl Landolina
8 representing the plaintiffs, Blue Fox Run Golf
9 Course, LLC, et al.

10 ATTY. OLSON: And Attorney Kari Olson of Murtha
11 Cullina representing the town of Avon and the
12 Wetlands Commission.

13 ATTY. SMITH: And Brian Smith --

14 THE COURT: And, Brian, you don't exist yet,
15 but...

16 ATTY. SMITH: -- from Robinson & Cole
17 representing the proposed interveners, Nod Road
18 Preservation, Inc., et al.

19 THE COURT: All right. We have two motions on
20 today. The first one -- please be seated all. The
21 first one deals with a discovery issue. And then
22 afterwards, we'll turn to the intervention motion
23 since the discovery issue came up first.

24 ATTY. LANDOLINA: Your Honor, I had withdrawn
25 that motion, so...

26 THE COURT: Oh, all right. That was easy. Then
27 let's talk about intervention. Mr. Smith.

1 that was proper. I don't think it needs to go to the
2 next level to have that issue decided.

3 THE COURT: Okay.

4 ATTY. LANDOLINA: Thank you.

5 THE COURT: Do you want to touch it?

6 ATTY. SMITH: Nothing further, Your Honor.

7 THE COURT: Okay. Mr. Landolina.

8 ATTY. LANDOLINA: Yes, Your Honor.

9 THE COURT: I can't tell you how much I disagree
10 with your argument.

11 ATTY. LANDOLINA: I think you just did.

12 THE COURT: Yeah, I think I just did. I think
13 this ship sailed almost fifty years ago. I think an
14 argument that suggests that mapping a property as to
15 where the wetlands are is not conduct totally
16 misunderstands the whole Inland Wetlands Act. If you
17 had attended any of my lectures back in 1976, or
18 about that period of time, when I lectured for the
19 Connecticut Bar Association --

20 ATTY. LANDOLINA: I was 18, Your Honor.

21 THE COURT: -- that the argument then -- the
22 discussion then was that there should be no
23 application until there is a map change. A map
24 change is part of the application process. You
25 cannot decide where to put something unless you know
26 where the wetlands is. It is so integral to the
27 whole notion of the preservation of wetlands as set

1 forth in 22a-36; you can't have one without the
2 other. I believe it is conduct. I believe I've
3 stated that over the years. I don't think there's
4 any question about that.

5 So as to the conduct issue, I believe that
6 mapping does constitute conduct. It is not a simple
7 legislative determination of changing the zone. It
8 is much more important function because it goes to
9 the protection of the wetlands. Whether or not we
10 want to change the zones to allow a McDonalds there
11 or not is completely different legislative
12 determination. So that's number one.

13 In light of that, all of Mr. Smith's clients
14 will be allowed to intervene, both the association as
15 well as the individuals. I think it is proper to do
16 that, I don't have any problem with that. It may
17 complicate this case, I get that, I'm well aware of
18 the intervention of neighbors and associations in
19 cases, but notwithstanding they are appropriate
20 parties for this case. So I'm going to allow them
21 in.

22 ATTY. LANDOLINA: Very well.

23 THE COURT: As to whether or not the commission
24 complied with its obligations under 22a-19, remains
25 to be seen. As to whether or not how this will
26 impact this case, it remains to be seen. But it is
27 essentially a map amendment case and I'm aware of how

NO: HHD CV19-6110376S : SUPERIOR COURT
BLUE FOX RUN GOLF COURSE, LLC,
ET AL : JUDICIAL DISTRICT
OF HARTFORD
v. : AT HARTFORD, CONNECTICUT
INLAND WETLANDS COMMISSION OF
THE TOWN OF AVON : AUGUST 23, 2019

C E R T I F I C A T I O N

I hereby certify the foregoing pages are/the electronic version is a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Hartford, Hartford, Connecticut, before the Honorable Marshall K. Berger, Jr., Judge, on the 23rd day of August, 2019.

Dated this 15th day of November, 2019 in Hartford, Connecticut.

Amanda Kizis
Amanda Kizis
Court Recording Monitor

MEMORANDUM

To: Inland Wetlands Commission of the Town of Avon

From: Brian R. Smith and Evan J. Seeman
Robinson & Cole LLP

Date: October 1, 2020

Subject: Application # 768 - FEMA 500-Year Flood Boundary Mapping

Enclosed is FEMA 500-Year Flood Boundary mapping shown on Applicant's Plan Sheet 3.3, entitled "Blue Fox Run Residences." This Plan Sheet was submitted as part of an earlier application (No. 759) to amend the subject property, which was denied by the Inland Wetlands Commission of the Town of Avon.

The dashed red line shows boundaries of the FEMA 500-Year flood line. The solid yellow line shows the boundaries of the properties that are the subject of the Application.

**FEMA 500-Year Flood Boundary
(El. 166)**

- LEGEND:**
- FLAGGED WETLANDS, WATERCOURSES, AND PONDS PER FIELD WORK
 - REGULATED ALLUVIAL SOILS WETLANDS PER 100-YEAR FLOOD LIMIT
 - TOWN MAPPING WATERBODIES AND WATERCOURSES
 - TOWN MAPPING FLOODPLAIN AND ALLUVIAL SOILS
 - TOWN MAPPING FIELD DELINEATED WETLAND

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 CONTACT NAME: BILL FERRIGNO
 EMAIL: bill@sunlightconstruction.com

**PRELIMINARY
NOT FOR CONSTRUCTION**

**BlueFoxRun
Residences**
 AVON, CT
 NOD ROAD

**WETLANDS MAP AMENDMENT
14 DECEMBER 2018**

MARK	DATE	DESCRIPTION
PROJECT NO:	2018005	
CAD FILE:	18005L-33.dwg	
DRAWN BY:	GJG/WFW	
CHECKED BY:	WCR	
COPYRIGHT:	©RICHTER & COGAN INC. 2018	
SHEET TITLE		

**WETLAND
COMPARISON &
DEVELOPMENT**

3.3

