



May 4, 2026

Town of Windsor Locks
Inland Wetlands and Watercourses Commission
50 Church Street
Windsor Locks, CT 06096

Re: Lukas Pond – 41 Single Family Residential Condominiums
F&L Construction Limited
177 Old County Road

Dear Commissioners:

I have reviewed the above referenced wetland application including the following documents:

- a) Site Plan, Lukas Pond, prepared by Barresi Associates, LLC including 26 sheets revised 4/29/26.
- b) Planting Plan Recommendations for Proposed Mitigation and Upland Review Areas, prepared by Soil Science and Environmental Services, Inc., including 16 pages dated 4/20/26
- c) Wetland Application and Supporting Documents, prepared by Ed Lally and Associates, Inc., bound set dated 3/27/26.
- d) Drainage Design & Stormwater Quality Analysis, bound sets (Parts 1 & 2) by Ed Lally and Associates, Inc., dated March 2026.
- e) Revisions to Drainage Analysis by Ed Lally and Associates, Inc., dated 4/23/26.
- f) Velocity and channel design analysis by Ed Lally and Associates, dated 4/22/26.

F&L Construction Limited proposes to construct a 41-unit multi-family residential development on a 15.9-acre parcel identified as 177 Old County Road. The property was the subject of two previous applications for similar developments, a 37-unit development in 2004 and a 54-unit development in 2019. The proposed development includes a 1,500-foot private roadway with cul-de-sac. The development crosses a riprap lined watercourse which discharges to a man-made pond identified as Lukas Pond. The applicant proposes to excavate the pond to improve its function as a water quality basin. While typically water quality basins should be located outside wetland boundaries, since this wetland appears to be stormwater basin constructed for this purpose, the activity could be considered a retrofitting to enhance an existing stormwater system.

Re: Lukas Pond – 41 Single Family Residential Condominiums
F&L Construction Limited
177 Old County Road

The property is bisected by a watercourse identified as Strawberry Meadow Brook. This watercourse conveys stormwater from a substantial urban watershed and due to sandy soils is highly prone to erosion. The 2019 application proposed crossing this watercourse but the current proposal stops short of this crossing and provides a conservation easement for Strawberry Meadow Brook precluding future crossings.

The application documents indicate the wetlands depicted on the plans were originally flagged in 2003, then updated in 2020 with additional investigations in 2025 & 2026 by Soil Science and Environmental Services, Inc. (SSES). The Planting Plan Recommendations by Jennifer Beno of SSES reference an updated Wetland Assessment Report dated 4/22/26 that is not included in the application documents. I was informed that Jennifer will not be available Wednesday night to present her reports. If the Commission has questions about the SSES reports, the hearing could be continued if necessary.

The application indicates the parcel contains 1.72 acres of wetlands and 3.39 acres of regulated upland review area. The proposed development disturbs 26,280 s.f. of wetlands and watercourses, most of which appear to be man-made or previously disturbed stormwater features. The total area of reported regulated activities in wetlands and upland review areas is 90,288 s.f.

Section 7.7.c requires applicants to provide a description of how the project will change, diminish or enhance the ecological communities and functions of the “wetlands” or “watercourses”, each alternative to the proposed “regulated activity”, and why each alternative considered was deemed neither feasible or “prudent”. The application includes a lengthy description of alternate design elements considered in the project. The Planting Plan Recommendations for Proposed Mitigation states, “The intention of the mitigation is to restore the pond habitat and to, over time, create a palustrine forested/palustrine scrub-brush wetland community around the pond that is free from a predominance of invasive plant species and provides the same or greater wetland functions than what will be impacted. The recommended plantings will provide vegetation diversity and wildlife habitat.”

I emailed a list of 38 comments to the applicant on 4/22/26 and they provided the revised plans and calculations referenced above as well as a written response to each comment which was included in the latest submission by the applicant. Many of these comments are not wetland related and should not be considered for the purpose of this application.

My wetlands comments are as follows:

1. The latest SSES Wetland Assessment Report shall be submitted and included for the record. The Commission may want to review this report before closing the hearing.

Re: Lukas Pond – 41 Single Family Residential Condominiums
F&L Construction Limited
177 Old County Road

2. The Commission may want to ask the applicant to elaborate on what function and values the impacted wetlands currently serve and how the mitigation measures will accomplish the intended goals of mitigation.
3. The recommendations of the Planting report by SSES shall be incorporated onto the plans. While the planting sketches have been incorporate into the plans, I suggest that all the recommendation of this report including construction specifications and post-construction monitoring and reporting requirements also be included.
4. Construction of the site infrastructure, particularly the sanitary sewer and pump station will likely include excavation within the water table requiring dewatering activities. Locations for pump settling basins for dewatering during construction should be noted on the erosion control plan.
5. In some locations, the regulated area depicted on the plan is based on the 40' setback from wetlands but the 80' setback from the watercourse within the wetlands is more restrictive. The plans should be updated to reflect the more restrictive of the two setbacks. Of particular note is the area along Strawberry Meadow Brook.
6. Provide Water Quality Flow (WQF) calculations for MH 142 demonstrating the Barracuda unit provides required pre-treatment per CT DEEP Stormwater Manual.
7. Label the existing pond outlet dimensions on the plans (10' weir, 12" culvert and 36" x 51.6" orifice) to correspond with the calculations.
8. I have inquired but not received confirmation whether the impacted wetlands are considered "federally regulated". If so, the project will require an Army Corp permit in addition to local wetland permitting. This permit is pursued after local permitting has been granted. Changes required by state or federal agencies may require a modification to this approval.
9. This project will also require a CT DEEP Stormwater registration for Construction Activities. This registration is also pursued after local permitting.
10. In accordance with section 12.3, the applicant shall submit an E&S bond in an amount determined by the Commission. The Commission may delegate the determination of the bond amount to the Town Engineer. In this case the applicant's engineer should submit an estimate to the Town Engineer for review and approval.
11. To ensure implementation and maintenance of the erosion control plans, the Commission may require the developer to hire a professional engineer, soil scientist

Re: Lukas Pond – 41 Single Family Residential Condominiums
F&L Construction Limited
177 Old County Road

or other professional acceptable to the Commission to perform weekly inspections during construction and within 24 hours after a rainfall that generates stormwater discharge from the site. The professional should prepare a monthly report for submission to the Wetland Agent. The Commission may modify the frequency of these reports depending on the status and condition of the project.

If you have any questions, please contact my office at 860-623-0569.

Sincerely,

Windsor Locks Town Engineer & Acting Wetland Agent

A handwritten signature in black ink, appearing to read "Dana Steele". The signature is fluid and cursive, with the first name "Dana" written in a larger, more prominent script than the last name "Steele".

Dana Steele, P.E.
J.R. Russo & Associates, LLC