WILLIAM KENNY ASSOCIATES
LANDSCAPE ARCHITECTURE ▪ ECOLOGICAL SERVICES

October 16, 2025

Westport Conservation Commission
110 Myrtle Avenue
Westport, Connecticut 06880

Re: Wetland and Watercourse Assessment
117 Beachside Avenue, Westport, CT

Dear Members of the Commission:

William Kenny Associates LLC (WKA) investigated the approximate 0.67-acre property at 117 Beachside Avenue in Westport, Connecticut to identify, inventory, and assess the existing and proposed tidal wetland and watercourse conditions related to the proposed razing of the existing dwelling and construction of a new two-story, single-family, residence. The following report includes the methods and results of this investigation. Wetlands were delineated by Aleksandra Moch, PSS, PWS, on April 29, 2025. WKA investigated the property on August 28, 2025. Our surveys were conducted on foot and observations were made while walking systematically through the property in areas of proposed activities and along and within critical habitats (i.e., wetlands and watercourses). Additional existing condition information and proposed condition information were assessed via a review of the following documentation:

- The *Site Development Plan* prepared by The Huntington Company, LLC, dated September 13, 2025.
- The *Drainage Report*, prepared by the Huntington Company, LLC, dated September 13, 2025.
- The *Planting Plan* prepared by William Kenny Associates LLC, dated October 16, 2025.

In summary, we find that the proposed redevelopment will not result in adverse impacts to wetlands or watercourses in the short or long term. Other than habitat enhancements, no activities are proposed within wetlands or watercourses, as such, no direct adverse impacts will occur. Likewise, with the installation, monitoring, and maintenance of soil erosion and sediment control measures during construction, and through stormwater management best management practices (BMPs) following construction, no indirect adverse impacts will occur. Benefits to the system will occur through management of stormwater where it currently is absent and through ongoing control of invasive-vegetation and future fostering and supplementing of native vegetation.

Existing Site Conditions

The approximate 0.67-acre residential property is located at 117 Beachside Avenue in Westport, Connecticut. Beachside Ave extends east to west along the southern property boundary. Other single-family residential properties are west, north, and east of the site and south of Beachside Avenue. A tidally-influenced and ponded segment of Sasco Creek abuts the northern property boundary and meadow and woodlands abut to the east. Open water of the Long Island Sound is located approximately 930 feet to the south, separated by large residential waterfront properties

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across Beachside Ave, as well as approximately 1,270 feet northeast at the outlet of Sasco Creek. Existing property improvements include a single-family residence with attached garage, asphalt drive, patio area, deck, stone walls, and other associated property improvements. The property is serviced by public water and onsite septic system. No apparent formal stormwater management systems are present to manage the quality or quantity of stormwater runoff. The majority of the property is located within FEMA flood zone AE. In general, the property slopes from south to north. Surface and shallow subsurface water follows this gradient to a wetland system, which encompasses the northern half of the property.

Vegetation onsite includes ornamental landscaping surrounding the dwelling and yard areas as well as a meadow area in the northern portion of the property. Surrounding the dwelling, tree species include native eastern white pine, arborvitae, and red cedar, non-native lily magnolia, yews, and lilac, as well as two invasive Norway maples. Shrub species included native rhododendrons, non-native privet, lilac, rose of Sharon, Japanese euonymus, panicle hydrangea, and forsythia, infrequently, invasive wineberry is present as well. Herbaceous species surrounding the dwelling include some native species such as black-eyed Susan, American burnweed, yellow wood sorrel, lady fern, sensitive fern, ostrich fern, devil's beggar-tick, and non-native lady's thumb.

Wildlife directly or indirectly observed at the property included common generalist species such as the grey squirrel, white-tailed deer, and various avian species. It is likely that other common mammal species, such as foxes and raccoons utilize the property and surrounding areas. Upland trees likely provide habitat for tree nesting birds and the meadow habitat likely provides food sources to a variety of insect, small mammal, and avian species. The site is located within an NDDB area associated with this portion of coastal Connecticut.

One tidal wetland and watercourse system is present at the property. The system, which is in the northern portion of the property, beyond the manicured lawn, is a large wetland meadow which abuts a portion of the tidally influenced Sasco Creek along the northern property boundary. Meadow vegetation is dominated by invasive vegetation such as common reed, porcelain berry, and mile-a-minute. The meadow also contains native species such as native golden rods, joe-pye-weed, boneset, swamp rose mallow, and blue vervain.

The primary characteristics of the wetland and watercourse system is provided in the following table.

Table One: *Wetland & Watercourse Primary Characteristics*

PRINCIPAL SOURCE(S) OF HYDROLOGY	***WATER TABLE TYPE***	***HGM CLASSIFICATION***	***USFWS CLASSIFICATION***	***VEGETATION COVER TYPE(S)***
SURFACE & GROUNDWATER INTERCEPTION	*APPARENT*	*GENTLY SLOPING*	*E2EM1P*[1]	*INVASIVE/NATIVE MEADOW*

[1]*Estuarine (E); Intertidal (2); Emergent (EM); Persistent (1); Irregularly Flooded (P)*

The primary functions of the wetland and watercourse system are modification of water quality, storm and flood water storage, and contribution to the abundance of wetland flora and fauna, all of which are being performed at a moderate to high level. The presence of invasive vegetation diminishes the contribution to wetland flora, though ongoing control of invasive species is occurring within the system.

Proposed Site Conditions

The proposed project involves the demolition of the existing dwelling and associated driveway, removal of existing septic system, and the construction of a new, FEMA-compliant, raised two-story dwelling with attached garage and rear deck, new driveway with stone walls abutting to the east and north, new septic system, rain garden, and subsurface stormwater management features.

The project will reduce impervious surface coverage by approximately 450 square feet. Despite the reduction in impervious surface, best management practices (BMPs) are proposed to mitigate and manage stormwater runoff. These proposed practices include a subsurface stormwater detention system and rain garden. Under existing conditions, no formal stormwater management BMPs are apparently present at the site.

Potential Impacts and Mitigation

Land development has the potential to cause short- and long-term, as well as direct and indirect, adverse impacts to wetlands and watercourses from activities such as vegetation clearing, soil filing, excavation, or pollution of stormwater. The proposed project is designed to avoid adverse impacts to the onsite and offsite wetland and watercourse systems. Except for habitat enhancements, no activities are proposed within wetlands or watercourses, as such, direct impacts to the onsite system will be avoided both in the short- and long-term. To avoid indirect adverse impacts, BMPs are proposed in both the short- and long-term to manage stormwater runoff.

In the short-term, wetlands and watercourses can be indirectly adversely impacted from sediment-laden stormwater runoff from proposed construction activities. To avoid short-term indirect impacts, the project includes the installation and maintenance of soil erosion and sediment control best management practices in accordance with the *2024 CT DEEP Erosion and Sediment Control Manual.* Soil erosion and sediment control measures include an anti-tracking pad at the construction entrance, geotextile silt fencing along the perimeters of disturbance areas, around stockpiles, and separating the project from the onsite wetlands, as well as silt-sack installations within proposed catch basins. With the proper implementation, monitoring, and maintenance of these control measures, short-term adverse indirect impacts to wetlands and watercourses will be avoided.

In the long-term, and if not properly mitigated, wetlands and watercourses can be indirectly adversely impacted by stormwater runoff that flows from structures, pavements, and ornamentally vegetated surfaces. Under existing conditions, no apparent formal stormwater management features are present onsite. According to the project engineer, the proposed project

will result in a decrease of approximately 450 square feet of impervious surface from existing conditions. With the reduction of impervious surface there will be more land available to infiltrate rain water, which reduces stormwater runoff and associated pollutant loads. Despite the reduction in impervious surface and pollutant loads, the project includes measures to manage stormwater runoff from impervious surfaces. Two primary BMPs are proposed, a subsurface stormwater detention system and a native-plant rain garden. The first system, which is an array subsurface stormwater detention structures, is proposed to retain and infiltrate stormwater derived from the proposed dwelling. Roof leaders from the proposed dwelling will connect to the subsurface system, retaining and infiltrating and thereby treating stormwater before it reaches a wetland or watercourse. As such, indirect adverse impacts from stormwater runoff from the dwelling's roof will be avoided. The rain garden, which is proposed in the western-central portion of the property, will retain and biofilter stormwater runoff from the proposed new driveway. Stormwater directed to this BMP will receive natural bio-filtration before either infiltrating into underlying the soil or being conveyed as overflow into the wetlands. The two management features will work in conjunction to capture and treat stormwater runoff from impervious surfaces before it reaches wetlands or watercourses. As such, through the implementation of these features, long-term indirect adverse impacts will be avoided.

As a benefit to the wetland system, ongoing invasive vegetation management is occurring within the wetland system. Targeted applications of state-permitted herbicide are currently being used to control common reed, *Phragmites australis,* and other invasive vegetation.

A comparison of the capacity of the onsite wetland and watercourse system to perform typical wetland and watercourse functions before and after the completion of the proposed site improvements was performed. This comparison was generated by evaluating the existing wetland functions and anticipated wetland functions after construction, within the context of typical wetlands functions and values, as established by Normandeau Associates, Inc. in the 1998 publication, *A Rapid Procedure for Assessing Wetland Functional Capacity.* Wetland functions are those self-sustaining properties of a wetland exist in the absence of society.

The comparison of the existing wetland functions and the anticipated wetland functions following implementation of the proposed project revealed that the wetland and watercourse functions will be maintained or improved from existing conditions. A summary of the evaluation of the onsite wetlands and watercourses is presented in the table below.

Table Two: *Overall Wetland & Watercourse Functions: Existing Conditions versus Proposed Conditions*

WETLAND FUNCTIONS	***RELATIVE CAPACITY TO PERFORM FUNCTION***		***FUNCTIONAL DETAILS***
	EXISTING	***PROPOSED***	
MEADOW WETLAND			
Modification of Groundwater Discharge	*LOW TO MODERATE*	*LOW TO MODERATE*	***Unchanged*** *– The capacity of the wetlands to influence the amount of water moving from ground water to surface water will not be altered with the proposed project.*

Modification of Groundwater Recharge	*MODERATE*	*MOADERATE*	***Unchanged** – The capacity of the wetlands to influence the amount of water moving from surface water to ground water will not be altered with the proposed project.*
Storm and Flood Water Storage	*MODERATE TO HIGH*	*MODERATE TO HIGH*	***Unchanged** – The capacity of the wetlands to store floodwater will not be altered with the proposed project.*
Modification of Stream Flow	*LOW*	*LOW*	***Unchanged** – The capacity of the wetland to produce or affect the hydrology of a downgrade stream will not be altered with the proposed project.*
Modification of Water Quality	*MODERATE*	*MODERATE*	***Unchanged** – The capacity of the wetlands to modify water quality will not be altered with the proposed project.*
Export of Detritus	*LOW*	*LOW*	***Unchanged** – The capacity of the wetlands to export organic detritus from the wetland to the adjacent and downstream aquatic ecosystems will not be alerted with the proposed project.*
Contribution to Abundance and Diversity of Wetland Flora	*MODERATE*	*MODERATE*	***Improved** – The wetland's capacity to contribute to the abundance and diversity of wetland flora will be improved via the implementation of the Wetland & Buffer Habitat Enhancement Planting Plan.*
Contribution to Abundance and Diversity of Wetland Fauna	*MODERATE*	*MODERATE*	***Improved** – The wetland's capacity to contribute to the abundance and diversity of wetland fauna will be improved via the implementation of the Wetland & Buffer Habitat Enhancement Planting Plan.*

Alternative Analysis

Two alternatives to the proposed application were considered, these were not determined to be the most prudent and feasible options, and as such are not proposed as the preferred project design. The first, which is to leave the existing dwelling and associated improvements was determined not to be the most prudent nor feasible alternative in that no ecological benefits would come to wetlands or watercourses. Under current conditions, no formal stormwater management features are in place to capture or treat stormwater runoff generated from impervious surfaces. As such, with the proposed reduction in impervious surface area and implementation of stormwater management best management practices, this alternative was abandoned. The second alternative, which was to allow invasive vegetation to persist within the onsite wetland system, was also not considered to be a prudent or feasible alternative. Allowing invasive vegetation to persist, particularly common reed (*Phragmites australis*), is not the most prudent option as the wetland system's ability to contribute the abundance and diversity of wetland flora and fauna will be less than it will be under the preferred project.

Conclusions

We completed an assessment of existing and proposed wetland and watercourse conditions related to the proposed redevelopment of the property at 117 Beachside Avenue in Westport, Connecticut. Based on this assessment, we conclude that the proposed redevelopment will have a net beneficial impact to wetlands and watercourses. Thank you for your consideration of this information. If you should have any questions or comments, please do not hesitate to contact us at (203) 366-0588.

Sincerely,

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Senior Land Use Ecologist

Andrew Delach
Land Use Ecologist

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