Dear Director Conroy and Chairwoman Garfein,

On behalf of the Twin Lakes Association (TLA) Board of Directors, I am writing to inform you that the Board has voted unanimously to recommend increasing the URA for East and West Twin Lakes from 75 feet to 100 feet. The primary reasons for this recommendation are:

• **Scientific Basis and CT DEEP URA Recommendations**: The most recent published guidance issued by CT DEEP determined that most activities likely to affect wetlands or watercourses occur within 100 feet of the shoreline. This guidance also states that a URA "beyond 100 feet is neither practical nor desirable from a wetlands or watercourses management perspective… It must be emphasized that other municipal authorities and mechanisms involving planning, zoning and subdivision decisions and plans of conservation and development, play a role in addressing the broader watershed issues." *

• **Twin Lakes is subject to the Lake Overlay Protection Zone (LOPZ) Regulations**: Twin Lakes is subject to the 300-foot LOPZ regulations which requires detailed review and approval by P&Z of all construction activities within 300 feet of the shoreline. IWWC routinely reviews all P&Z applications for properties that abut the lakes, thus creating an additional layer of protection for activities that create **the most risk** of negatively impacting water quality.

Proactive Stewardship and Balanced Regulation: The decision of the TLA board to support a 100-foot URA is conditioned upon the approval of a reasonable list of "allowed activities" that can be conducted by homeowners within the URA without having to seek prior approval of the IWWC. This is critically important as virtually all the privately held land on Twin Lakes is already developed. Many of the lots are small, often less than an acre. For example, for residents who live on South Shore Road, a 100 URA will encompass from the shoreline to the roadside entrance of most of the 33 homes. An added benefit of providing a reasonable list of permitted activities is that it will provide homeowners clarity in terms of activities that may be conducted for the routine maintenance and enjoyment of their property that do not require review versus those that require prior review. This will facilitate homeowner education and engender support for the new regulations.

Each of the regulated lakes in town has a long history of self-management, shaped by their unique history, culture, and use patterns. This includes differences in lake management approaches including the use of herbicides, horsepower and speed limits for motorboats and other issues that directly affect lake residents. We urge the IWWC to recognize the differences of each lake community and to respect their wishes. The TLA Board believes that a 100-foot URA is the correct approach for Twin Lakes,

striking a balance between education and regulation while enhancing the long-term health of this important natural resource.

We appreciate your time and consideration and look forward to further discussions.

Best regards,
Grant Bogle, President
Twin Lakes Association

*Guidelines Upland Review Area Regulations Connecticut's Inland Wetlands and Watercourses Act, June 1997. Page 4.