



## Ridgefield Conservation Commission

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Mr. Rudy Marconi  
First Selectman  
400 Main Street  
Ridgefield, CT 06877

July 26, 2017

Dear Rudy,

The Conservation Commission feels it is important to comment on the horse guidelines being proposed for the town. Since we have enacted our *Open Space Use Ordinance* enforcement procedures, most of our violations have been caused by property owners who didn't know what restrictions applied to their property<sup>1</sup>. In addition, about half of our violations, to date, have been by owners of horses. We feel strongly that the best way to prevent enforcement issues is to make sure homeowners understand regulations concerning their property. A thorough, detailed and specific list of guidelines that is easily accessed will prevent headaches for neighbors and unnecessary work for the town.

Our concern with horses, as mentioned in our previous letter (dated May 8, 2017), involves protection of water quality for properties downstream of waterbodies and for wetlands. Manure contains bacteria, which is considered a pollutant. Even small amounts of bacteria can significantly increase *E. coli* levels in a waterbody. The Norwalk, Saugatuck, and Still Rivers are currently non-conforming rivers (they are polluted with various substances). Bacteria (*E. coli*) is one of the substances making them non-conforming.

Ridgefield's proposed MS4 guidelines mention bacteria from pet waste and waterfowl as being a pollutant of concern (Table 1.9).

From our MS4 Guidelines:

"6.8.2 Ridgefield will identify locations where inappropriate pet waste management practices are immediately apparent and pose a threat to receiving water quality due to proximity and potential for direct conveyance of waste to its storm system and waters. In such areas, Ridgefield will implement targeted management efforts such as public education and enforcement".

While the horse guideline committee agreed that horses would be considered "pets", we believe there should be separate language concerning horses.

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<sup>1</sup> In fact, we have started mailing new residents in town a welcome letter and Open Space Map to identify where their property abuts town open space and/or where their property contains a conservation easement.

We have suggested a vegetative buffer be required between waterbodies (including wetlands) and any area where horses are paddocked or grazed. The width of the buffer would be dependent on the slope of the property, ranging from 50 feet for 0% slope to 150 feet for more than a 15% slope. The *Guidance and Recommendations for Connecticut Municipal Zoning Regulations and Ordinances for Livestock* (a publication of the Eastern Connecticut Resource Conservation and Development Area, Inc.), states “Sites with steep slopes should be avoided or improved to avoid heavy surface water runoff, soil erosion, sedimentation or hazardous conditions for keeping of animals. Areas with a steep slope may be used for certain agricultural production activities, such as grazing, if properly maintained so that soils are not exposed and buffers are used to filter and trap nutrients before they enter surface waters.”

The storage of manure near water bodies is also a concern, both for neighboring properties and adjacent waterbodies.

From the MS4:

“4.5 Special Provisions: Upland Review Area Boundaries—Regulated Activities in Uplands shall include but are not limited to: Buildings used for the storage of animal manure, toxic or hazardous substances: 75’ for Wetlands and 100’ for Watercourses” (increases to 100’ for wetlands for the Titicus, Norwalk, Silvermine and Saugatuck Rivers and for Mamanasco Lake).

For further guidance, the *Good Horse Keeping Best Practices Manual for Protecting the Environment—2011*, which was published by HEAP (Horse Environmental Awareness Program—a CT horse owner group) is a valuable resource for horse owners. It states:

- “Locate manure storage as far from property lines and water sources as possible;
- Vegetative buffers are an effective tool for filtering nutrients, pathogens and sediment from stormwater runoff”;
- Structures that house horses should not be closer than 40’ from abutting property lines’; and
- Establish buffers between fields and environmentally sensitive areas, such as, wetlands, watercourses, wells, gullies, ditches, surface inlets, concentrated flow paths or areas with rapidly permeable soils or aquifer protection areas.”

We believe living near wetlands and waterbodies adds value to our properties, and that enhancement requires responsibilities for the owners of those properties to be considerate of their downstream neighbors. The town has proposed guidelines in their MS4 document that do take our concerns into consideration. We are asking that these be amended to include horses and that they be adopted now, rather than waiting for the new MS4 permit to become regulation.

Sincerely,

A handwritten signature in cursive script that reads "James J. Coyle". The signature is written in dark ink and is positioned above the typed name and title.

James J. Coyle, Chairman  
Ridgefield Conservation Commission