

**NARRATIVE TO ACCOMPANY APPLICATION OF GALES FERRY INTERMODAL,
LLC TO TOWN OF LEDYARD PLANNING AND ZONING COMMISSION**

DATE: MARCH 7, 2023
REVISED: MARCH 28, 2023
REVISED: APRIL 5, 2023

The application submitted with this Narrative is submitted for site plan and special permit approval for the re-development of the northwesterly corner of the real property of Gales Ferry Intermodal, LLC (the “Applicant”) located at 1761 Connecticut Route 12 in Ledyard, Connecticut (the “Property”). The Property is the site of the former Dow Chemical manufacturing facility, and has been committed to industrial use since at least the mid-19th century. A portion of the Property is currently used for the manufacture of Styrofoam products by Americas Styrenics, a tenant of the Property. The Dow Chemical facilities at the Property terminated their manufacturing existence circa 2011 and the former Dow Chemical manufacturing buildings have been removed from the Property. The Property was acquired by the Applicant on May 19, 2022 with the intent to redevelop the Property as a full service industrial intermodal facility taking advantage of (i) its excellent highway access (ii) the presence of rail service including a rail siding and (iii) deepwater access on the Thames River together with the presence of an existing pier suitable to accommodate industrial vessel traffic.

The instant application constitutes the first in a series of applications which will be submitted to the Town of Ledyard Planning and Zoning Commission for the industrial redevelopment of this site. The application submitted herewith contemplates the construction of a 20,000 square foot building which will be utilized by the Applicant for a motor vehicle, ship, machinery and/or equipment repair use with the accessory outside storage of materials, equipment and machinery utilized in conjunction with its marine contracting operations along the east coast of the United States. In addition to the construction of the proposed building, the Applicant contemplates the construction of loading docks, maneuvering aisles and a subsurface sewage disposal system to accommodate the proposed reuse of the northwesterly section of the Property, all as depicted on the submitted site development plan.

Submitted herewith and constituting a component of the application for site plan and special permit approval is the site development plan prepared by Loureiro Engineering, Inc. entitled “Gales Ferry Intermodal Sterling Facility 1761 Route 12 Gales Ferry, Connecticut 06335 March 07, 2023 Property Owner/Applicant: Gales Ferry Intermodal LLC 549 South Street Quincy, MA 02169 Prepared By: Engineer: Loureiro Engineering Associates, Inc. 100 Northwest Drive · Plainville, Connecticut 06062 Phone: 860-747-6181 · Fax: 860-747-8822 An Employee Owned Company · www.Loureiro.com Engineering • Construction • EH&S • Energy Waste • Facility Services • Laboratory” consisting of Sheets 1 of 20 to 20 of 20 (the “Site Development Plan”).

The Site Development Plan has been formulated by Loureiro Engineering Associates, Inc. to incorporate the landscape design standards and requirements contained in Section 9.3 of the Ledyard Zoning Regulations. For this purpose, existing vegetated buffer areas have been maintained between the area of the proposed industrial development and the adjoining property to

the north. The development area is buffered to the east and south by remaining real property of the Applicant and to the west by the railroad right of way and the Thames River.

As noted above, the Applicant has acquired the subject property due, inter alia, to its unique locational characteristics with immediate access to a state highway, an active rail line and deepwater vessel access. As such, the site is uniquely situated to accommodate transportation services for the bulk movement of goods and materials by three (3) separate and distinct methods of transportation which can be utilized in order to develop the Property to its full potential. While the instant application is a minimal traffic generator, the Applicant has commissioned a traffic study which will be submitted for consideration in conjunction with future applications for the development of the Property for uses which may have the propensity to generate more significant vehicular traffic.

This development initiative is located on property within the primary industrial zoning district of the Town of Ledyard. The zoning district classification for the Property (which has remained consistent since the inception of zoning in the Town of Ledyard) reflects the historic use of the Property as a developed industrial site dating back nearly 200 years. The development proposed by the instant application is consistent with the zoning district classification of the Property. As evidenced by the Site Development Plan, the setback, landscaping and buffering treatments incorporated into the Site Development Plan are compliant with the requirements of the Ledyard Zoning Regulations and will mitigate any perceived adverse impacts to adjoining properties to the north. The proposed development of the Property is consistent in both scale and use with the development contemplated by the Town of Ledyard Zoning Regulations. As such, any impacts on neighboring property values will be consistent with the impacts contemplated by the current and historic zoning district classification of the Property as an industrial site.

The proposed use of the portion of the site which is the subject of this application is consistent with the goals and recommendations contained in the current Ledyard Plan of Conservation and Development.

The Property is located within the Coastal Management Area. The application submitted herewith is therefore, in addition to an application for site plan and special permit approval, an application for Coastal Area Management approval. As indicated above, the first phase of the redevelopment of the Property is for the development of a 20,000 square foot building to be utilized for vehicle, ship, equipment and machinery repair, material storage and appurtenant facilities that will support the activities of the Applicant's affiliate engaged in marine contracting. This phase of the development will provide for the development of a facility which will provide support services by way of equipment and material storage and a repair facility for the affiliate's marine contracting and dredging activities (which are not a component of this application).

Coastal resources located on the site (with the site being defined as the entirety of the Property) ~~include coastal hazard areas, coastal waters and developed shoreline. The following coastal use policies are applicable to the proposed project: stormwater management and water dependent uses. The following coastal resource policies are applicable to the proposed project: general resources and developed shoreline.~~ as depicted on a plan entitled "Coastal Area Management Plan Gales Ferry Intermodal 1761 Route 12, Gales Ferry, Connecticut 06335 Gales

Ferry Intermodal, LLC 549 South Street, Quincy, MA 02169 Drawing C-11 Sheet No. 14 No. of Sheets 20 Scale As Noted Comm. No. 045JC2.06 Drawn By: ESF Date 03/07/2023 Approved By SRM Date 03/07/2023 Loureiro Engineering Associates, Inc. 100 Northwest Drive · Plainville, Connecticut 06062 Phone: 860-747-6181 · Fax: 860-747-8822” (the “Coastal Site Plan”) evidence the following coastal resources present on the Property:

- (a) Developed shoreline, defined as port and harbor areas which have been highly engineered and developed resulting in the functional impairment or substantial alteration of their natural physiographic features or systems.
- (b) Water – open water bodies such as but not limited to lakes and ponds subject to regulation under Sections 22a-36 to 22a-45 of the Connecticut General Statutes (Allyn’s Pond).
- (c) Regulated tidal wetlands – official state designated and regulated tidal wetlands located within the coastal boundary.
- (d) Coastal flood hazard areas – 100 year coastal flood hazard areas as identified by the Federal Emergency Management Agency (FEMA) on those coastal areas currently unmapped by FEMA, the flood hazard area is conservatively approximated by the 10’ contour interval.
- (e) Estuarine embayments – protected coastal water bodies with an open connection to the Sound including tidal rivers, bays, coves and lagoons.
- (f) Shorelands – upland areas at elevations in excess of the 100 year still water flood level and located within the coastal boundary (the entirety of the area contemplated for development by this application).

In conjunction with the development of this project, all activities proposed in conjunction with the development of the “Sterling Building” are proposed on shorelands.

Notwithstanding the foregoing, the development of the facility proposed in this Application will support water dependent uses as the activities proposed to be conducted on the improved site are limited to the provision of support services in conjunction with the marine contracting operations of the Applicant’s affiliates. Within the context of the Coastal Management Act, the development of the proposed “Sterling Building” facility is categorized as general development. Policies applicable to general development are as follows:

- (a) To ensure that the development, preservation or use of the land and water resources of the coastal area proceeds in a manner consistent with the capability of the land and water resources to support development, preservation or use without significantly disrupting either the natural environment or sound economic growth.
- (b) To resolve conflicts between conflicting uses on the shorelands adjacent to marine and tidal waters by giving preference to uses that minimize adverse impacts on natural coastal resources while providing long term and stable economic benefits.

The findings contained in the Coastal Management Act include the following:

“It is found and declared that there exists in the State a great and growing need for industrial and commercial development and activity to provide and maintain employment and tax revenue; that assistance and encouragement of industrial and commercial development to provide and maintain such employment and revenues is an important function of the State; that the availability of financial assistance and suitable facilities are important inducements to industrial and commercial enterprises to remain or locate in this State and therefore the necessity in the public interest and for the public benefit and good for the provisions of this chapter is hereby declared as a matter of legislative determination... It is further found and declared that there exists a great and growing need for the acquisition and construction of railroads for the operation of freight and passenger trains and associated equipment to transport persons and goods and for the acquisition and construction of: facilities and equipment necessary or useful in connection with railroad operations, including railroad right of way and all associated tracks and facilities, including but not limited to switches, sidings, yards, signal systems and bridges; related plant facilities, including but not limited to station buildings, maintenances and storage facilities... shop equipment... and therefore this necessity is in the public interest and for the public benefit and good is hereby declared as a matter of legislative determination.”

The Coastal Management Act further enunciates as a goal “Economic Development Policy A” (strengthening of State economy by attracting private investment...”

The proposed use will support water dependent uses that make use of existing developed shorefront, including the presence of an existing pier which has the ability to accommodate large scale commercial and industrial vessels. No adverse impacts are anticipated to coastal resources resulting from the contemplated development. This Application contemplates only the re-development of shorelands without otherwise impacting any other coastal resources. The proposal is a reuse of a present and prior industrial property. The proposed water dependent use takes advantage of the unique characteristics of the Property including deepwater and rail access at the Property by providing support services for the full and complete operation of industrial and commercial water dependent uses. As a component of the overall development of the former Dow Chemical properties located at 1761 and 1737 Route 12, Ledyard, Connecticut, this component of the overall project attains consistency with the policies and goals for shorelands located within the coastal boundary enunciated by the Connecticut Legislature in implementing a use which will complement shorefront activities associated with the existing and to be expanded pier at the Property which has deepwater access for shipping and the transportation of goods associated with the logistical intermodal capabilities of the site complemented by the existing railroad line which bisects the site. These two attributes are specifically referenced in the Coastal Policies and Use Guidelines.

The project is water dependent and will provide shorefront services by making available support services for the future intermodal use of the Property which will include receiving and transporting goods and materials by vessel.

The project will provide support services for the use of the existing pier on the Property and encourage water dependent uses that will utilize the existing pier for both shipping and receiving of bulk materials by barge and vessel. The proposed development will not have adverse impacts on water dependent uses as it reuses an existing vacant industrial portion of the Property with an existing deepwater pier to provide support services for other uses which will take advantage of the pier and deep water present along the shorefront of the Property in support of water dependent uses for shipping and receiving of materials.

The project consists of the redevelopment of an existing industrially developed shorefront property (although the activities occurring in conjunction with the component of the overall project which is the subject of this Application are occurring solely on shorelands) to provide support services which will be utilized to foster new water dependent uses. Stormwater treatment systems have been included in the design for the redevelopment of the project to improve the quality of stormwater discharges consistent with the recommendations contained in 2004 Stormwater Quality Manual promulgated by the State of Connecticut Department of Energy and Environmental Protection. In addition, the Applicant has developed a stormwater pollution protection plan and a spill prevention plan for incorporation into the vernacular of the use and operation of the Property in order to ensure that neither shorelands nor adjacent coastal resources will be adversely impacted by the development of this project. In conjunction with this application, no activity is proposed waterward of the Coastal Jurisdiction Line. The Applicant submits that there are no adverse impacts to coastal resources which require mitigation in conjunction with this application.

The project is not located within a designated federal flood hazard area.

GALES FERRY INTERMODAL, LLC

By: _____
Harry B. Heller, its Agent, duly authorized