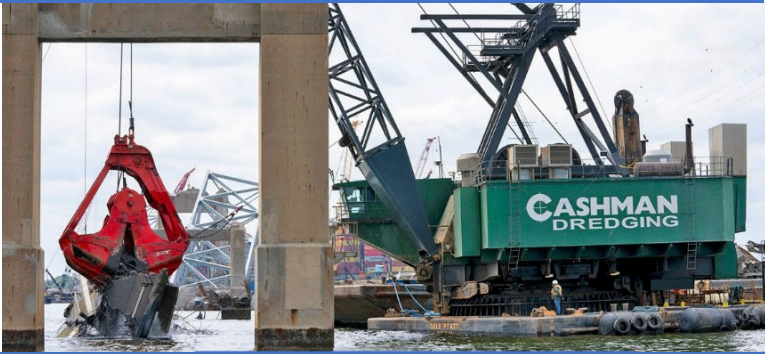


Gales Ferry Intermodal COMMUNITY CONCERNS



Margaret Laforest, Laforest Strategic Advisors

BALTIMORE HARBOR



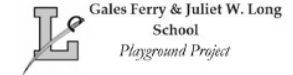
BOSTON CENTRAL ARTERY TUNNEL



MASSACHUSETTS BRIDGE



CASHMAN A STRONG COMMUNITY PARTNER



1949 USS SALEM CA139



Constructed new berth and relocated Quincy built museum ship after its pier was declared unsafe to the public.

1937 USCG BOATHOUSE



Provided transportation & storage while Chatham Selectboard determines plans for preservation & adaptive reuse

**CASHMAN
HISTORIC
PRESERVATION
PROJECTS**

1806 SOUTHER TIDE MILL



After significant storm damage, completed repairs while covering all material and construction costs at the request of Quincy's Mayor.

PIER 1 - 1797 USS CONSTITUTION



Reconstructed berth & surrounding wharf while maintaining the historical accuracy of the pier at times working within 20 feet of the historic vessel, in coordination with USN, NAVFAC, NHHC, NPS.

US Navy, Naval Facilities Engineering Command, Navy History & Heritage Command, National Park Service

COMMUNITY CONCERN: HISTORY

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/ CONCLUSION		
<p><i>David George, M.A., RPA Heritage Consultants</i> EX# 2 Page 9</p> <p>Phase IA/IB Cultural Resources Assessment & Reconnaissance Surveys EX# 2 Pages 204-310</p> <p>Phase II National Register of Historic Places Testing & Evaluation of the Fort Decatur Archaeological Site EX# 38</p>	<ul style="list-style-type: none"> Document Historic Asset Preservation NOT REQUIRED Public Access NOT REQUIRED 	<ul style="list-style-type: none"> Fort Decatur and Sentry Post are SAVED Allyn Cemetery will remain undisturbed and accessible Phase IA/1B Cultural Resources Assessment & Reconnaissance Surveys complete Phase II National Register of Historic Places testing & evaluation of the Fort Decatur Archaeological Site complete Donation of 3.44 acres including Historic Assets ensuring preservation in perpetuity TAC allowance of public access by request Donation of artifacts for public benefit to state archeological office at UCONN Actively engaged with non-profit groups concerning the appropriate management and stewardship of the cultural resource area. <p>IF PROJECT APPROVED</p> <ul style="list-style-type: none"> Donation of additional 5.87 acres to TAC Prepare and submit a National Register of Historic Places nomination for Fort Decatur Edit volume of the History of Fort Decatur for SHPO 	<p>STATE REVIEW <i>CT State Historic Preservation Office (SHPO)</i> EX# 217 fully executed Historic Preservation Agreement “No Adverse Effect” to historic properties by activities identified in Development Plan</p> <p><i>The Archeological Conservancy (TAC)</i> EX# 95-1, 95-2 Signed agreement with TAC. “A win for preservation” <i>Kelly Berliner, TAC Eastern Regional Director</i></p>		
SPECIAL PERMIT CRITERIA		GFI	PEER REVIEW	PZC DECISION	
<p>11.3.4.D that no adverse effect would result to the property values or historic features of the immediate neighborhood;</p> <p>11.3.4.E that the character of the immediate neighborhood would be preserved in terms of scale, density, intensity of use, existing historic/natural assets/ features and architectural design;</p>		YES	YES		
		YES	YES		

COMMUNITY CONCERN: PROPERTY VALUES

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/ CONCLUSION
<p>Steven MacCormack, MacCormack Appraisal Services CT Certified General Real Estate Appraiser EX# 2 pages 16, 179-203</p>	<p>Certified Appraiser analyzed local sales data including Baldwin Hill project area and affirmed no detrimental impact to property values.</p>	<ul style="list-style-type: none"> • No adverse impact for residential home value. • Current Real Estate Taxes \$139,240 annually • Permitting fees \$522,798 • PILOT/Tipping Fee \$.25/cy estimated at \$892,500 over ten years directed towards Town’s Capital Improvement Plan. • Job creation Annual Discretionary spend <ul style="list-style-type: none"> 32 Site Preparation \$1,588,944 45 Construction \$2,234,452 130 Permanent \$5,700,630 • Level site suitable for the development of 260,000 square feet of industrial space • When developed, site will have net fiscal positive tax revenue \$1,064,192 annually 	<p>Dr. Donald J. Poland, PhD, AICP Senior VP And Managing Director, Planning & Strategy, Goman & York EX#102</p> <p>Goman & York Fiscal & Economic Impact Study EX# 103 concludes a Positive Economic Impact – EMPLOYMENT and RATABLES and concurs there will not be adverse impact for residential home values.</p> <p>GFI capital investment will move them up from #4 to #2 highest taxpayer in Ledyard with a 10X value increase in property assessment expected in 13 years.</p> <p>GFI will have a meaningful positive economic impact in the Norwich-New London Region.</p>
SPECIAL PERMIT CRITERIA	GFI	PEER REVIEW	PZC DECISION
<p>11.3.4.D that no adverse effect would result to the property values or historic features of the immediate neighborhood;</p>	<p>YES</p>	<p>YES</p>	

COMMUNITY CONCERN: TRAFFIC

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/ CONCLUSION
<p>Scott Hesketh, P.E. and Manager of Traffic and Transportation Engineering, F. A. Hesketh & Associates, Inc. EX#2 Pages 29, 48-69</p> <p>Traffic study concluded the proposed site generated traffic will not adversely affect traffic operations within the Route 12 corridor or at any of the studied intersections and will not create any hazardous condition within the studied highway corridor system.</p>	<p>Trip Generation allowance is based on “highest, best use of property”. Institute of Transportation Engineers (ITE) advises the standard trip generation rate by use. https://www.itetripgen.org/</p> <p>Site is exceptionally accessible via a deepwater pier, a rail line, and a state highway with a signalized intersection.</p>	<ul style="list-style-type: none"> • Completed Traffic Study • Self-imposed limit of 50 Truck Round Trips Per Day • Updating specified signage and vegetation removal to improve existing conditions as recommended • Utilize vessel transport of materials to reduce onsite truck trips • Improving and utilizing rail infrastructure to reduce road traffic. Rail use in compliance with US Department of Transportation Federal Railroad Administration (FRA) • Improving and utilizing pier infrastructure to reduce road traffic. Pier use in compliance with USCG Captain of the Port. 	<p>Weston & Sampson EX# 101 “According to the provided traffic analysis reports and summary, the trips added to Route 12 are within operating capacity of the roadway and do not cause sizable changes to the Level-of-Service of intersection operations based on typical traffic engineering practice.”</p>

SPECIAL PERMIT CRITERIA	GFI	PEER REVIEW	PZC DECISION
<p>11.3.4.B that transportation services would be adequate and that the uses would not cause traffic congestion or undue traffic generation that would have a deleterious effect on the welfare or the safety of the motoring public;</p>	<p>YES</p>	<p>YES</p>	

COMMUNITY CONCERN: PUBLIC HEALTH/ENVIRONMENT - Stormwater, Waterways & Wildlife

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/ CONCLUSION
<p>George Andrews, PE/LEP Loureiro Engineering Associates EX#2 Pages 5-8, 351-486, Stormwater Management Pages 487-592, EX# 3, 39-2, 57, 91 (1-4), 173, 174, 175, 176</p> <p>EX# 173 Stormwater Management Report</p> <p>EX# 174 Stormwater Pollution Control Plan</p> <p>EX#175 addresses CLA Engineers comments</p> <p>EX# 176 response to Trinkaus Engineering</p>	<p>Ledyard Inland Wetlands & Watercourses (IWWC) Permit</p> <p>Compliance with CT DEEP 2024 guidelines for Soil Erosion and Sediment Control 2024 CT Storm Water Quality Manual</p> <p>CT DEEP Natural Diversity Database (NDDDB) Submission</p> <p>Connecticut Coastal Management Act (CCMA) water-dependent uses support and develop the region’s “blue economy”</p>	<ul style="list-style-type: none"> • Compliance with Ledyard Inland Wetlands & Watercourses (IWWC) Permit and approved mitigation. • Compliance with CT DEEP permit • Loureiro Stormwater Pollution Control Plan developed • Existing conditions = no stormwater management features/ Improved site conditions = treated stormwater • Adherence with Loureiro’s Inspection, Maintenance, and Monitoring Plan • Implementation of Natural Diversity Database (NDDDB) Best Management Practices for Short nose sturgeon, Atlantic sturgeon and Blueback herring and report submission for observed species. • Improving and utilizing deep water pier infrastructure in compliance with USCG Captain of the Port. 	<p>Robert C. Russo, C.S.S., Soil Scientist/ Environmental Scientist, CLA Engineers, Inc. EX# 29 no new application to the IWWC is warranted. EX# 100 provided comments to address. EX# 175 is Loureiro response. EX# 199 provides comments have been addressed.</p> <p>STATE REVIEW CT DEEP Land Water Resource Division CT DEEP Rock Regrading Filing # 104229, NDDDB EX# 137(1-4), 142 – New Determination Number: 202308990 valid until November 2025</p> <p>TOWN REVIEW Ledyard IWWC Permit Granted 7/11/23</p> <p>Public Works Director/Town Engineer finds the Stormwater Management plan meets the requirements of Ordinance 300-017. Memo from 11/14/2023</p>

SPECIAL PERMIT CRITERIA	GFI	PEER REVIEW	PZC DECISION
<p>11.3.4.F In accordance with CGS §22a-19, that the proposed uses would not cause any unreasonable pollution, impairment or destruction of the air, water and other natural resources of the state;</p>	<p>YES</p>	<p>YES</p>	

COMMUNITY CONCERN: PUBLIC HEALTH - Air Quality - Dust - Sound - Toxicology

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/ CONCLUSION		
<p>Scott McKenna, CMSP – Catamount Consulting Certified MSHA instructor & OSHA Trainer EX#2(11)</p> <p>Suzanne Pisano P.E. & Dr. John Martin, Verdantas Air Emissions Modeling Results EX# 2 Pages 311-350 and EX#105 demonstrate that the facility particulate concentrations at the property boundary would comply with the National Ambient Air Quality Standard (NAAQS).</p> <p>Ken Kaliski, PE, INCE Board Cert., RSG EX# 37 Performed sound emission modeling to residential receptors and formulated mitigation strategies. EX# 221 HMMH Peer Review Response</p> <p>Jeff Slade, PG, Senior Geologist, Continental Placer/Adirondack Geologic Services EX# 2, EX# 75, EX# 76, EX# 77 Pages 11-18, EX# 171-2. NO Acid Rock Drainage (ARD), Arsenic, Sulfur or Sulfide minerals (pyrrhotite or chalcopyrite).</p> <p>RJ Lee Group performed a more sensitive detection geologist analysis of rock sample evidencing the fact NO Arsenic was detected at the 1.84 parts per million sensitivity level. EX# 138-2, 155, 171-2</p>	<p>Worker safety regulated by Mine Safety Health Administration (MSHA)/Occupational Safety and Health Administration (OSHA)</p> <p>U.S. Environmental Protection Agency (EPA) has delegated authority to CT DEEP to administrate CT’s air quality programs/Clean Air Act.</p> <p>NAAQS Model Created using Groton meteorological data. Verdantas data is shown to be below state and federal permit thresholds.</p> <p>Noise is subject to CT §§ 22a-69-1—22a-69-7.4 regulations</p> <p>Conducted Geologist Analysis</p>	<ul style="list-style-type: none"> • MSHA/OSHA regulation compliance • Air Quality Community Monitoring Plan developed by Verdantas EX#2 Pages 342-350. Equipment will be placed at property boundaries. Monitors alert workers on site and project team leadership immediately • Utilize an electric conveyor system to transport materials to reduce onsite truck trips and reduce dust. • Dust mitigation - wetting all blasts and installing misters on all earth product processing equipment, including conveyors • Monitoring of sound at property boundaries near closest residential receptors for all phases • Maintain 5Dba below daytime limit at every residential receptor, including Montville • Adding a berm (east side), parallel to Rt12, in Phase 2 (vs Phase 5) and a 12-foot high sound wall (west side) of excavation areas • Eliminating Phase 5 drilling and blasting 	<p>Harris Miller Miller & Hanson Inc. (HMMH) EX# 130, 132 RSG EX# 221 updated sound report – project attains maximum emission of 56Dba at residential receptors (1 Dba less than the recommended L90 plus 5Dba). Additional noise mitigation has been confirmed and all comments have been addressed.</p> <p>Verdantas study found to be comprehensively and largely conservatively prepared, addressing all pertinent air quality regulations. It used the correct dispersion model and representative meteorological data, and did not find any inaccuracies in the development of modeling or emission parameters.</p> <p>The primary and secondary National Ambient Air Quality Standards (NAAQS) are applied correctly, and the modeling results indicate that there would be no exceedance with the approach that the applicant has committed to.</p> <p>Recommended air quality modeling (GFI committed)</p> <p>Ledge Light Health District EX#190 response to PZC referral EX#181. Has jurisdiction for standing water/mosquito concern and can require treatment if warranted. Referred PZC to CT Dept of Public Health State Radon Program</p>		
SPECIAL PERMIT CRITERIA			GFI	PEER REVIEW	PZC DECISION
<p>11.3.4.C that the proposed uses and structures would be in harmony with the appropriate and orderly development of the Zoning District in which they are proposed to be situated, and that the use(s) would not be noxious, offensive, or detrimental to the area by reason of odors, fumes, dust, noise, vibrations, appearance, or other similar reasons;</p> <p>11.3.4.F In accordance with CGS §22a-19, that the proposed uses would not cause any unreasonable pollution, impairment or destruction of the air, water and other natural resources of the state;</p>			YES	YES	
			YES	YES	

COMMUNITY CONCERN: PUBLIC HEALTH - Blasting - Vibration

GALES FERRY INTERMODAL	REGULATIONS	COMMITMENT/ COMMUNITY BENEFIT	PEER REVIEW/CONCLUSION		
<p>Tim Harmon & Kevin Godfrey, Maine Drilling and Blasting EX# 2 Pages 14-15, 39-45, 106, 174-177, 222 EX#106 attests MDB reviewed records back to 2004 and found no complaints nor claims for damage from Baldwin Hill.</p> <p>Dr. Catherine Aimone-Martin, Aimone-Martin Associates, LLC EX#83-2 concludes that rock blasting planned for the GFI Industrial Site development is deemed highly safe and protective of the surrounding infrastructure and utilities.”</p> <p>Greg Poole, PEVP Technical Services, Sauls Seismic EX# 93-CV, EX# 94 Vibration Impact Analysis. Based on the planned blasting and construction activities and industry standard calculations, vibration levels and air overpressure from blasting and construction activities on this project will remain below regulatory limits and far below threshold damage levels at the adjacent locations. EX# 139 response to HMMH.</p>	<p>Legally must apply same criteria to GFI as recently permitted Baldwin Hill.</p> <p>Compliance with Office of Surface Mining, Reclamation and Enforcement (OSM) Blasting Guidance Manual for vibration limits</p>	<ul style="list-style-type: none"> • Blasting designed to less than half of legal blasting limit. Committed blasts between 11am and 4pm. Shoot 3 to 4 x week at first then once per week. Whole process takes less than a second. • Pre-blast surveys of homes within 750 feet radius will be conducted • Gales Ferry Fire and the State Fire Marshall will monitor blasting operations and ensure all local and state codes are followed to ensure the safety of the workers and the Gales Ferry community. • Seismograph will measure and monitor audio, latitude, transverse, vertical which all have to stay within 2” per second. permanent set up at Fort Decatur, another at closest structure. • Ledyard WPCA conditioned Cashman employ blasting specialist expert, deploy blasting vibration instrumentation, conduct leak test on Route 12 main and resident service lines, pay for the water meter pit needed for the plant, fund water service to any resulting well failures and post bond/insurance. 	<p>TOWN REVIEW Ledyard Fire Marshal Jim Mann reports “all (Baldwin Hill) readings thus far have been within specifications.” EX#80</p> <p>Ledyard Water Pollution Control Authority applied conditions per EX# 2 page 47</p> <p>Both the Ledyard Water Pollution Control Authority commissioners and Groton Utilities have reviewed the blast report and have no major concerns. EX# 123</p> <p>PEER REVIEW Harris Miller Miller & Hanson Inc. (HMMH) EX# 130, 132</p> <p>Sauls Seismic EX#139 clarified blasting in US follows regulations based on US Bureau of Mines (USBM) “z-curve” while construction activities follow Federal Transit Administration (FTA) Transit.</p> <p>Aimone-Martin Associates Study - We agree with the findings that blasting would not cause issues for the utility infrastructure, specifically the transmission line and water main.</p>		
SPECIAL PERMIT CRITERIA			GFI	PEER REVIEW	PZC DECISION
<p>11.3.4.C that the proposed uses and structures would be in harmony with the appropriate and orderly development of the Zoning District in which they are proposed to be situated, and that the use(s) would not be noxious, offensive, or detrimental to the area by reason of odors, fumes, dust, noise, vibrations, appearance, or other similar reasons;</p>			YES	YES	