

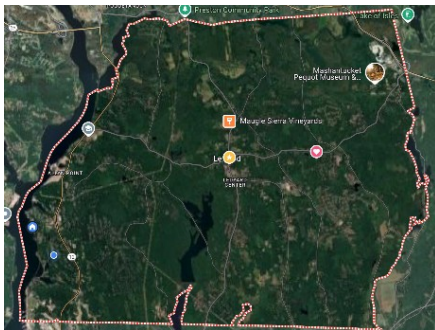
September 10, 2024

To: Town of Ledyard, Ct
Planning & Zoning Commission
& Land Use Planning Director, Liz Burdick
Ref: Cashman GFI Application - Quarry, Application
PZ#24-8SUP & PZ#24-9CAM - 1737 and 1761 Connecticut Route 12 (Parcel IDs: 76-2120-1737 & 61-2120-1761), Gales Ferry, CT

Dear Ms. Burdick & P&Z Commissioners,

My statement here is in response to statements made and implied by Cashman Dredging representatives that the Thames River is a historical, prime, active, industrial area well suited for the GFI development and Quarry activity. Their opining statements seem clearly intended to color, a possible foundational purpose, of their application.

However, I argue that industrial growth is emphatically not a positive objective, or even active, based on environmental pollution recovery efforts on the Thames, the most significant of which have occurred in the last 35 years. Historically. The Thames River Estuary suffered great pollution from the very industries that Cashman is using as a “growth” example. As a reckless teenager I swam in the Thames in 1965. I remember well, the cloudy brown water and a mysterious coating.



Environmentally, the proposed quarry operation must be given serious review. As Town of Ledyard boundaries extend to the middle of the Thames River, including areas leased to an Oyster Farming operation north & south of GFI, it is imperative that the Planning Commission review includes the effect of any development along this body of water and the surrounding land and air conditions.

From the subbase, northward to Norwich, industry on the Thames has been in decline for many decades. The vast majority of shoreline industrial sites are now inactive or significantly reduced in industrial activity, many due to environmental pollution regulations and economic

failure.

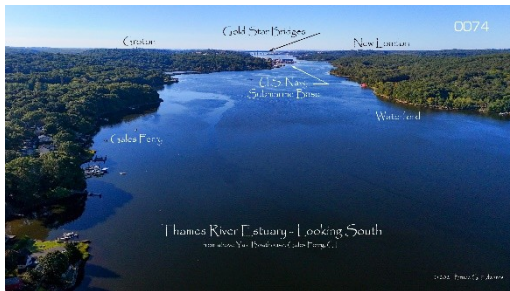
Some Examples:

1. AES Thames Coal-fired Cogeneration Power Plant, Montville – Built in 1989, shut down in 2011, and subsequently demolished and removed.
2. WestRock Paperboard, Montville. After many decades of operation, shut down, demolished, and removed.
3. NRG powerplant, Montville, reduced operation to a part-time, “peak demand” operation. Currently undergoing modifications.
4. Dow Chemical, Gales Ferry. Except for AmSty, Dow plant operations were suspended and much of the plant facility was removed, leaving behind a significant, EPA/DEEP registered ground contamination area at GFI, that is capped with a multi-fractured bituminous cover, and is separated from the river by only a narrow rail line. GFI intends heavy equipment on this area. Ouch.
5. Additional industrial sites along the Thames going north, including a large scrap metal facility in Norwich, have also ceased operation and been removed. Reworld (formerly Covanta) Trash to Energy plant in Preston is perhaps not as clean as it should be.

All of the above-listed facilities, plus the Subbase, EB, Pfizer, and other shoreline industrial operations, have contributed to the heavy pollution of the Thames. Gateway Terminal, now located on the former site of AES Thames & WestRock Paperboard was a relocation from New London for

road salt storage. It is also a refueling station for Wind Farm support vessels from which there have already been fuel spills into the river.

To assist in a real understanding of the Thames River Estuary, I am including 5 aerial images for locating key reference points, and a link that supports my concerns for preserving and enhancing the continual needs of environmental responsibility for the Thames. Low resolution images, seen here, are only to provide a guide to the attached medium resolution images which are the ones that should be reviewed. High resolution images for review, are available to the P&Z Commission on request.



Attached photos: '0074, 0069, 0008,0012, 0041



15 or so years ago, bald eagles began to appear here. Since then, I have personally observed and photographed many “Federally Protected” bald eagles populating the Thames River shoreline in Gales Ferry, Waterford and Montville. Osprey & heron activity has also grown during this time. Fish activity of snapper blues, bluefish and striped bass, have expanded considerably in magnitude as well. They are living proof that the river is getting cleaner and better. This eagle is less than a ½ mile from GFI and the proposed quarry site, that eagles fly to and by often. Eagle nesting on Mt Decatur is suspected, but not confirmed, due to access restrictions

over the years.

The operation of a quarry at GFI is an activity that is contrary to the healing the Thames River Estuary is still experiencing and will surely send it backward.

I believe you are not allowed to approve an application that presents clear and present risk to health, the environment and the quality of life to the Town. What about the region? To support my observations stated here, I add the following link to the "SWIFT" (Sustainable Watershed Initiative for Thames River) Report of April 3, 2024. It also contains additional linked supporting information. On a curious note, an apparent source of current pollution to the Thames comes from Flat Brook, via Long Cove in Gales Ferry. The head end of flat brook is at the controversial Baldwin Hill quarry site.

<https://www.wrc.udel.edu/wp-content/uploads/2024/07/SWIFT-Report.pdf>

In your mandate and responsibility as P&Z Commissioners & Director, it is incumbent on you to consider and weigh all evidence presented to you in the application and in submitted Exhibits. I know you understand this, I also know that the weight of this application is enormous and difficult. I greatly appreciate your efforts. But it is possible to accomplish correctly. Credible, verifiable information to support your end decision is at hand, in the many exhibits submitted on this and past applications. Regarding that, Cashman appears to be playing a walnut game, hiding previous exhibits by removing and application and then resubmitting it with apparently only marginal differences. Is this really a ploy to rid their current application of opposing, credible, Exhibit data, in the expectation you will no longer be able to consider it?

Finally, though it is true that a "quarry" is an "excavation", most excavations are not quarries with a long-term commercial quest for profit. In the most basic sense, the word dance in this application misses the truth rhythm entirely. An application should be presented in a concise, truthful form, not embellished with misrepresentations of intention. It is patently absurd to believe that Cashman will "excavate" 7,000,000 cubic yards of stone, for 5 to 10 years or more, harm a community and the environment, destroy a hill with significant American History, just to provide space for a couple of buildings intended for unknown tenants, when there is so much available open level space existing on the property. I suspect it is not only an effort to profit but, I imagine it may be a cover for a renewed, future approach to obtain a permit for Solid Waste Treatment of Dredge spoils. Is it fair to assume the duality has been in Cashman's playbook all along?

I said before that I am deeply offended by Cashman's effort which will surely harm the health, the environment, and the quality of life in this Thames River region, not just Gales Ferry. It still stands. We need to protect ourselves and our good neighbors. Similar to Commission volunteers, the efforts of many neighbors to protect this Town, our health, homes, and the environment, comes at great cost of time, and even money.

The efforts to recover the Thames are ongoing. I would hate to see it go backward. I trust that sound reasoning, review, and regulatory compliance will prevail in your decision. I do sincerely thank you for your difficult work to date, and going forward.

All the Best,
Bruce Edwards
30 Bluff Road West,
Gales Ferry, 06335

September 11, 2024 ~~December 17, 2023~~

To:

Liz Burdick, Ledyard Planning Officer
Edith Pastana, CT DEEP (CEEJAC)

I request this email attachment/printed correspondence, be placed into the record of the Ledyard Planning Commission, Applications: PZ#24-8SUP & PZ#24-9CAM - 1737 and 1761 Connecticut Route 12 (Parcel IDs: 76-2120-1737 & 61-2120-1761), Gales Ferry, CT. ~~PZ#11-SUP and PZ#12-CAM~~ of Gales Ferry Intermodal, LLC, for a Special Permit to excavate and "Quarry" Historic MT Decatur.

I would also request that CT DEEP, (CEEJAC), place this email attachment into the record for any reviews concerning the Gales Ferry Intermodal planned operations of a stone quarry at Allyn's Point, Gales Ferry, CT.

Water & Gas Concerns -

GFI Planned Quarry Operations for Stone Aggregate production at Allyn's Point Water

There are numerous wells that could be affected by the proposed GFI quarry operations. Reasonable questions brought forth in the community and the response from the applicant regarding well checks, advance more questions about how the blasting may threaten even more than the wells. It is my belief that determinations on potentially dangerous blasting impacts from this quarry project should be revealed with studies conducted by credentialed, government and/or independent, experts in the fields of seismic activity effects on geologic underground formations such as bedrock and aquifers. I have not seen any Exhibits presented by the applicant, GFI, that pertain to seismic impacts to contaminated ground, aquifers and drinking water watershed areas.

Let us go deeper:

Current municipal water mains are located on Route 12, from Groton, north to the bridge at Poquetanuck Cove, continuing on to service Preston and Norwich, I believe. Branch lines cover much of Gales Ferry, including all of Gales Ferry Village, and some areas in Ledyard. The Rt 12 main transits within tens of yards of the proposed blasting area. These waterlines, and many area wells, can be disrupted when subjected to the seismic effects of nearby blasting. Groton Utilities, the agency responsible for the safe operation of these municipal water lines, has already requested additional time to review the potential impact in a letter to the Ledyard Planning Commission.

<https://ledyardct.legistar.com/View.ashx?M=F&ID=12528560&GUID=799CBB1B-33C3-41BC-9EBE-E47E5A8D8203>

Furthermore, there is the question of the aquifer. According to DEEP, virtually all of CT sits on some type of Aquifer. However, there are specific "Aquifer Protection Areas" designated throughout CT. Southeastern CT has few "Aquifer Protection Areas" and one of the most significant is located below Pine Swamp, just off the end of Friar Tuck and only one mile from the Phase 1 area of the quarry blasting. It is well under a mile to Phase 4 & 5. See Image 1 below.

<https://portal.ct.gov/DEEP/Aquifer-Protection-and-Groundwater/Aquifer-Protection/Aquifer-Protection-Area-Maps>
<https://ctdeep.maps.arcgis.com/apps/webappviewer/index.html?id=6b33fc05fcce4c5286fafa1b2cccbfb>

Now, here is where it becomes very critical to me. If you also look at the Mt Decatur image below, Image 2, you will see a large arrowhead shaped paved area in the lower half of the photograph. This is the "Capped area" of ground contamination left by Dow Chemical. The pavement "Cap" clearly appears to have been severely compromised by the numerous fractures in the pavement. This contaminated area is just a few yards from the proposed blast zones and is directly under heavy equipment transit routes as specified in Cashman's P&Z Public Hearing presentation of 12/14/23. See Image 3 below. I would ask DEEP, and the Ledyard Planning Commission to consider the impact carefully. References to possible migrations of contaminants from the Subbase to the Baldwin Hill area many years ago may be available in the archive records of the Baldwin Hill quarry or nearby properties. As I recall, there was a lawsuit involving migratory contamination there.

Although this “Cap,” a paved lot, is supposed to be recapped by GFI, there are still questions of when and how much of the contamination has already made it into the water table, the Thames River, and the aquifer. I believe the engineering of a “Cap” is intended to contain and prevent wash-through and distribution of the contaminants to other areas beyond the contaminated area boundaries. Even with the new Cap, which will presumably be accomplished before quarry work, what will seismic disruption from blasting, and the constant running of trucks and heavy equipment over the surface, cause to underlying bedrock, fissures, and pathways to the aquifer?

The bottom line is the relentless exposure to blasting for 7 -10 years or more, to remove approximately 7,000,000 cubic yards of granite stone for the creation of crushed stone aggregate to sell, is a long term threat reliant on constant vigilance and care from the applicant. This is very scary when just one explosive shot could theoretically open pathways for benzene and other contaminants to reach the aquifer. Complacency is our enemy. To me, this demands a comprehensive study and report by highly qualified, independent, geologic, seismic, and environmental engineers and scientists, before this project should be allowed to commence, if at all. It is incumbent, by Ledyard Planning Regulation, that the applicant, GFI/Cashman Dredging, proves a substantial expectation of safety to the community and the region. Our safety should not stand on the promise of those who actually stand to profit and do not even live here.

<https://www.usgs.gov/special-topics/water-science-school/science/contamination-groundwater>

GAS

The Eversource/Yankee natural gas main that travels up Route 12, branches off to an underground line that follows Hurlbutt Road through Gales Ferry Village, and crosses the River from the Public Boat Launch next to the Yale Boathouse, under the Riverbed, to the Montville side. I do not know if the main runs to points north, under Rt 12 from the Hurlbutt Road intersection. Regardless, the effects of seismic activity from blasting less than a ½ mile from the Hurlbutt line, are again, very concerning. This community, this region, deserves qualified, independent, assurances of safety by Eversource, at the very least.

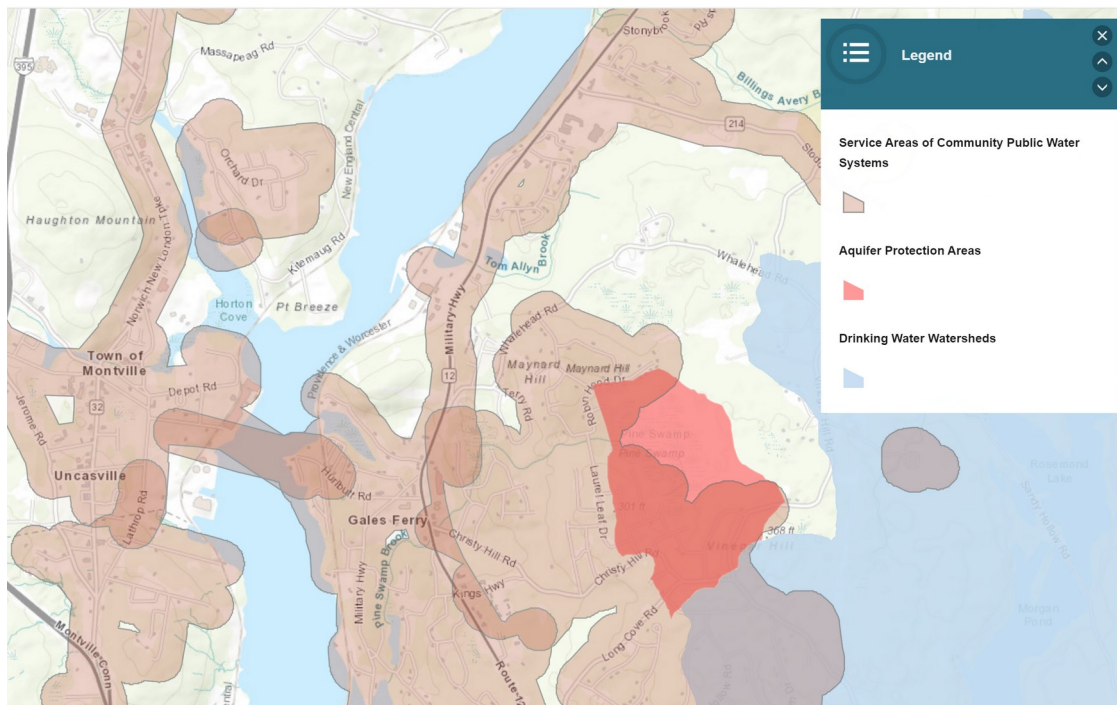


Image 1. The red areas are “Aquifer Protection Areas,” the Brown areas are public water supply systems.

<https://maps.ct.gov/portal/apps/View/index.html?appid=6a340817f7d648d589ebbcc3a699edda&extent=-73.4742,40.9889,-71.7164,41.9765>



Image 2. This large, paved area is, according to the 12/14/23 presentation by Attorney Heller is a portion of the existing contaminated “Cap” area of the former Dow property which will be used primarily for stockpiling aggregate. The “Cap” will be subject to numerous transits by heavy equipment and loaded trucks. The hill seen here is the north face of historic “Mt Decatur” (Dragon Hill), 40 acres of which will be quarried. As described by Atty Heller, the excavation equipment and truck entrance/exit to Stage 1 of the Quarry, will be several yards to the right of the white structure seen in the photo. There is a railroad spur used by AmSty, that runs along the south edge of the Cap (paved area). See also, Image 3., below.

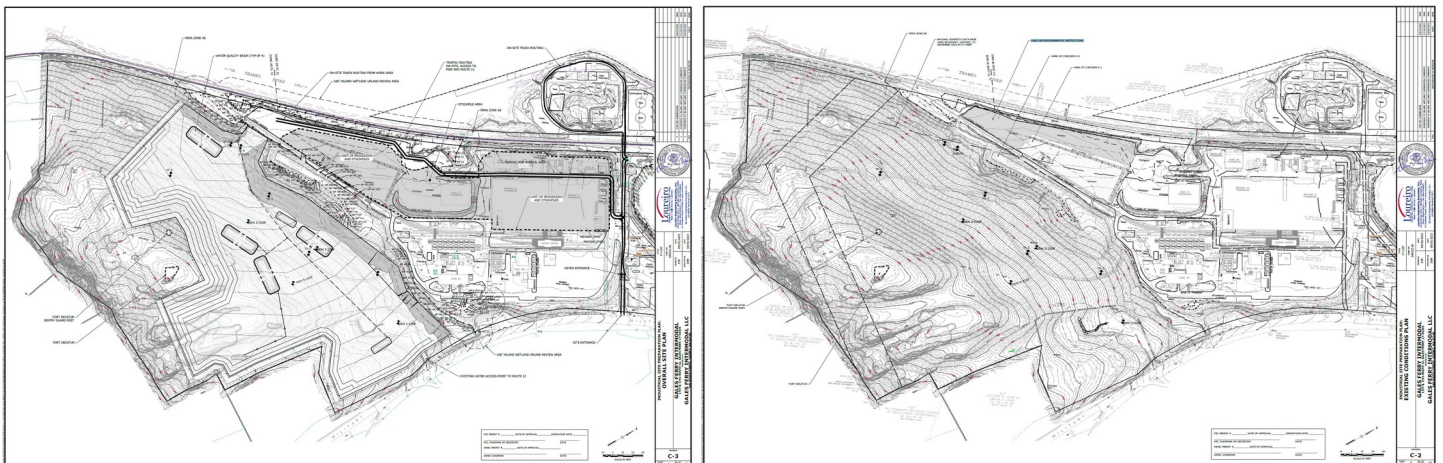


Image 3. Image from GFI Special Permit Applications PZ#11-SUP and PZ#12-CAM, Page 5&6 of PDF Exhibit 2, Site Plans. <https://ledyardct.legistar.com/gateway.aspx?M=F&ID=56cac258-ee7d-4543-92fa-5072e29882f9.pdf>

September 11, 2024

Re: PZ#24-8SUP & PZ#24-9CAM - 1737 and 1761 Connecticut Route 12 (Parcel IDs: 76-2120-1737 & 61-2120-1761), Gales Ferry, CT.

~~Applications PZ#11-SUP and PZ#12-CAM of Gales Ferry Intermodal, LLC located at 549 South Street, Quincy MA 02169 for a Special Use Permit and CAM Review to modify existing SUP for Mixed use (Commerical/Industrial) to add an Excavation-Operation, Major on the property located at 1737 and 1761 Connecticut Route 12, Gales Ferry CT.~~

Dear, Ledyard Planner Liz Burdick & Members of the Ledyard Planning Commission:

OBJECTION TO THE QUARRY

I am writing with a **strong objection to the allowance of the quarry operations proposed by GFI/Cashman Dredging & Marine Contracting Co., LLC**, to be conducted on Mt. Decatur, at Cashman's GFI, Allyn's Point, Gales Ferry, CT facility. My reasoning has to do with a known quarry process, and the effect it will have on numerous points, including impacts to safety, quality of life and damage to an environmentally sensitive area that has been successfully in recovery for more than 30 years. The recovery has led to cleaner water that, in turn, led to the resurgence of the fish, bald eagle and osprey populations and the viable operation of Oyster bed fields.

Regardless, the Thames River recovery is still in process.

<https://mywaterway.epa.gov/community/06335/overview>

The clear impact of the extensive increase and type change of the operational intensity of use of this property is a giant step backward on the safety of people, fish & wildlife, and the environment. It is, in my view, indefensible. To also allow the suggested destruction of Mt Decatur, a historical area incredibly significant to the American History of the War of 1812, in the mere interest of profit, would scar this Town severely.

We cannot and should not divorce our thinking from the very apparent strategies of Cashman's endeavors for both the quarry and the previously proposed, "on hold," Solid Waste Treatment Facility to amend Contaminated Dredge Spoils. If the Ledyard Planning Commission opens the door to a quarry, surely Cashman will attempt to go through it with a Solid Waste Treatment Facility.

Importantly, the site at GFI has known contamination existing in the ground, left by Dow Chemical. It is imperative that Ledyard citizens can be assured from an independent study by Gov't, and/or Gov't approved agencies, as required, that blasting will not cause the transfer of toxic chemicals into the aquifer and wells, through the opening of fissures, or unsettling movement of underground strata. Was the U.S. EPA aware of intentions to blast in the close proximity of a know ground contamination when the granted CA550 on September 29, 2023, just 1 ½ months ago? We should know this.

https://ordspub.epa.gov/ords/cimc/f?p=CIMC:RCRA::::P14_RCRA_HANDLER_ID:CTD001159730

Your voluntary dedication to ensure the safety of the citizens of Ledyard is not only deeply appreciated, but also mandated. Your review of this application, with so many complicated facets to consider, is likely to be the most important consideration this Town has been challenged with. I apologize for the lengthy correspondence, but this is just a microscopic hint of the problem before you.

Negative Environmental, Safety, and other Impacts and Threats

Because the GFI operation of a quarry, in this location, with the expressed intents for transportation by truck, barge and rail, all of the following pertain as questions and considerations that should require the applicant, GFI/Cashman, to produce suitable and verifiable data to support and ensure that the quarry will meet all applicable Federal, State & Local regulations and laws, not just what Cashman would like to present in favor. In

short, harmful exposure in near countless forms, is of deep concern. Following is a collection of comments and questions, with as many authoritative references/links as I could acquire with limited time and resources to date.

COMMENTS TO CONSIDER:

1. **MT DECATUR** - Irreparable Destruction of a hill, Mt Decatur. It will be, essentially, vandalizing land significant to War of 1812 American history, on our watch, as we the responsible stewards of this region.
2. **HIGHWAY SAFETY** - RT 12 threats due to:
 - a) Predictable increase in accident risk with local traffic. A high increase in intensity of truck traffic will have a corresponding increase in the risk of accidents.
(Note - already closure this summer of RT 12 by the Subbase for a Baldwin Hill trailer-dump truck accident.)
 - b) Nearby proximity to two schools, businesses, a fire house, and churches. Think student transportation, daily, and afterschool activities. Think increased emergency response time.
 - c) Significant impedance to RT 12 direct access driveways and RT 12 un-signalized intersections.
https://ops.fhwa.dot.gov/access_mgmt/what_is_accsmgmt.htm
 - d) Accelerated road deterioration. "This is significant because a five-axle, tractor-trailer, loaded to the 80,000-pound Federal limit, has the same impact on an interstate highway as 9,600 automobiles. In addition, as truck axle weights increase, pavement damage increases an at even faster rate. For example, while a truck axle carrying 18,000 pounds is only 9 times heavier than a 2,000-pound automobile axle, it does 5,000 times more damage."
<https://www.gao.gov/products/109954>
 - e) Stone spills (already happening from Baldwin Hill gravel operations)
<https://www.fmcsa.dot.gov/mission/field-offices>
3. **AIR QUALITY** - Air quality decline, due to dust and exhaust fumes, in close proximity to homes, schools, churches and businesses and the Gales Ferry Fire Company. In summertime, prevalent southwest winds will drive the dust to the north to northeast. In winter, the direction will be to the south and southeast. Even the basic DEEP guidelines on this should elicit serious alarm.
<https://portal.ct.gov/-/media/DEEP/air/AQI/airqualityguidepm2013pdf.pdf>
<https://portal.ct.gov/-/media/DEEP/air/AQI/airqualityguidepm2013pdf.pdf>
<https://portal.ct.gov/DEEP/Air/Monitoring/Air-Pollutant-Information>
4. **NOISE** - Blasting, Truck & Heavy equipment - including on-site and off-site engine noise, back-up alarms, tailgate slams, rock loading bangs, jake brakes, rock crushing machinery, conveyor belt operation, etc. Prevention, as opposed to costly monitoring and difficult enforcement, is preferred when faced with a proposed Class C Category operating directly adjacent to a Class A.
https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_22aSubtitle_22a-69Section_22a-69-1.7/
5. **TRAFFIC** - Significant traffic delays on Rt 12 throughout the day and possibly nighttime. Delays brew impatience. Impatience is a known root cause of many motor vehicle accidents.
<https://www.cga.ct.gov/PS98/rpt%5Colr%5Chtm/98-R-1038.htm>
6. **FISH & WILDLIFE HARM** - Failure of Cashman to demonstrate full, independent, studies of environmental impact to fish & wildlife. Recently, there were two fuel spills into the Thames, totaling nearly 2000 gallons. 1200 gallons plus, is Cashman related at Gateway, Montville, and hit the Gales Ferry shoreline.

7. **BALD EAGLES** - Threats to habitat of Federally Protected American Bald Eagles.
 Note the following excerpt from the Code of Federal Regulations § 22.6 Definitions –
 “Disturb means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available,
 (1) injury to an eagle,
 (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or
 (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”
<https://www.ecfr.gov/current/title-50/chapter-I/subchapter-B/part-22/subpart-A/section-22.6>
<https://portal.ct.gov/DEEP/Wildlife/Learn-About-Wildlife/Bald-Eagles-in-Connecticut>
<https://www.fws.gov/law/bald-and-golden-eagle-protection-act>
<https://www.govinfo.gov/content/pkg/USCODE-2010-title16/pdf/USCODE-2010-title16-chap5A-subchapII.pdf>
8. **POLLUTION, MONITORING & COST** - Contaminated runoff and dust into Thames Valley Estuary, threatening a river that has taken decades to clean up and recover, to its current condition. Who will be charged with monitoring and enforcement? Who will pay for it?
<https://business.ct.gov/-/media/DOT/documents/dpolicy/WaterNoiseCompliance/HelpfulDesign/apassa.pdf>
9. **OYSTER BED** - Threats to active and permitted Oyster Bed operations.
<https://www.fisheries.noaa.gov/national/habitat-conservation/oyster-reef-habitat>
<https://portal.ct.gov/DOAG/Aquaculture1/Aquaculture/Environmental-Benefits-of-Shellfish-Aquaculture>
<https://www.theoysterbed.com/pages/friends>
10. **BARGES & VESSELS** – Extensive Barge and vessel activity, and storage, has an impact on waterway and shorelines. With the quarry project, the intensity of use will increase with spillage, runoff, turbulence, and grounding. The Solid Waste Treatment operation would expand a destructive impact, exponentially.
<https://mywaterway.epa.gov/>
11. **REAL ESTATE** - Threats to Real Estate values and thus, tax revenue. Remember, loss of equity equals loss of property tax revenue, albeit usually delayed.
http://www.killthealbionquarry.org/US_Study_on_the_impact_of_pits_quarries_on_home_prices.pdf
12. **BLASTING** - Blasting effects that potentially release existing inground contamination (Benzene, etc.) into the aquifer and disrupt foundations, including tall storage tanks containing toxic chemicals.
https://www.nhsec.nh.gov/projects/2015-04/post-certificate%20filings/2015-04_2019-04-26_bmp_rock_blasting_water_quality.pdf
13. **LONG TERM IMPACT** -Failure of Cashman to honestly present the totality of the impact if and when the GFI Solid Waste Treatment plant proposal is implemented.
14. **ACCURACY OF INFORMATION** - Cashman has a responsibility to accurately present and demonstrate the actual noise, dust, safety impacts and environmental impacts, including Fish & Wildlife, of the proposed quarry operation. Independent, comprehensive, EPA/DEEP approved analyses would help. See reference links in the above paragraphs. I also suggest a review of Cashman’s public comments on the proposed GFI Solid Waste Treatment facility for accuracy.

QUESTIONS TO CONSIDER:

- A. Has Cashman made any request for Archeological Surveys relative to State and Federal mandates concerning the Mashantucket/Pequot and Mohegan Tribes? These are known hunting and fishing areas. Possible burial sites?
Archeological Investigations (Cgs § 10-381 Et Seq.)
- B. Has Cashman made any request for Archeological Surveys relative to the War of 1812 historical significance? Is Mt Decatur qualified for the National Register of Historical sites and has an application been submitted? If not, why not, and does it bear on the P&Z considerations?
<https://www.gsa.gov/reference/statutes/national-historic-preservation-act>
- C. Has Cashman formally notified Ledyard, CT DEEP, U.S. Fish & Wildlife, and other appropriate agencies about deforestation destruction and fish & wildlife habitat threats?
- D. Has Cashman formally notified the U.S. Navy, the Army Corps of Engineers, and the U.S. Coast Guard, about intended GFI barge and vessel activity associated with the quarry, for any required and appropriate approvals of operation and applicable regulations such as Title 33, Code of Federal Regulations? If not, how could we approve this, and why would we waste our time on this?
<https://www.ecfr.gov/current/title-33/chapter-I/subchapter-A/part-2?toc=1>
<https://www.usace.army.mil/Portals/2/docs/Safety/EM385-1-1%20Section%2019FINAL.pdf>
- E. Has Cashman demonstrated to Ledyard, the U.S. Navy, the Army Core of Engineers, U.S. Fish & Wildlife, CT DEEP, etc., a monitoring system and comprehensive environmental response plan for shoreline and waterborne operations that may involve fuel and other contamination spills, vessel collision, unintended departure (dragging anchor, etc.) and sinkings?
Ref: Cashman barge sinking, spilling “Superfund Toxic Waste” into Gowanus Bay, Brooklyn, NY in 2021 due to barge existing damage, neglect, and failure to monitor in a storm condition. Also, the Thames River fuel spill.
<https://professionalmariner.com/barge-carrying-toxic-sediment-from-gowanus-canal-sinks/>
<https://ctexaminer.com/2023/09/13/wind-energy-vessel-involved-in-diesel-spill-in-new-londons-thames-river/>
- F. Has Cashman demonstrated any experience and history of quarry management?
- G. Is it part off the Planning Commissions mandate to consider Legal and/or Civil liability exposure to the Town and potential legal costs?

Perspective

Ledyard/Gales Ferry is not just a place to me, it is home. I have been a resident and/or landowner in Ledyard since 1965, when I arrived here as a Navy dependent. I graduated from LHS in 1970 and my daughter graduated from LHS in 1990. I am a professional industrial/creative photographer and video producer, and also a former Defense Marine Industrial designer. I also have a long history of boating, including a trans-Atlantic sail. I swam and boated in the polluted Thames River when I was fourteen. I know the difference between then and now.

I have seen several GFI presentations and social media comparisons made between Dow and the proposed GFI activities. In an effort to justify the Cashman proposal, they imply that the **“intensity of use”** will be similar. In short, their contentions are highly inaccurate and absurdly skewed. Dow Chemical & AmSty are incredibly different operations from the quarry, with significantly different issues. As a direct witness to decades of Dow’s operational impacts, I can see no substantive, viable comparison, other than they are both generally classified as industrial. A VW Bug is a car. A Ferrari F1 racing machine is also a car. They are not of the same intensity. It is a fair analogy.

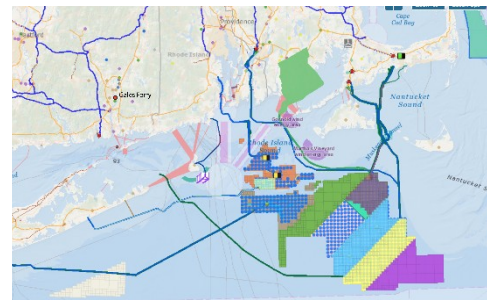
Noise and dust intrusion was not an issue with Dow but will be with the Quarry. Road safety and delays due to truck traffic are not remotely comparable because Dow did not roll trucks in anywhere near the same quantity or load weight. Nor did they load them in the same noisy and dusty manner with loaders, excavators, and conveyors. Overall, the operational intensity of the proposed GFI quarry activity will vastly exceed the former activities of Dow or the current use by AmSty. Environmentally, on Ledyard Roads and the Thames, it is a striking difference. Dow trucks, though mostly heavy, were clean operations and only occasional.

A comparison of pollution and harm shows that both Dow and Cashman did and will produce considerable environmental harm in their own respective, differing ways. Please note: Dow was a “friendly” chemical business that quietly polluted the ground, the river and also the air. We know much more now than we did years ago. We also can look back at a major Styrofoam stockpile fire in 1999 and a storage tank fire in 2017 as very visible, Dow, environmental impacts. The 1999 fire took hours to control and locked down a good part of the town for safety reasons related to exposure to toxic smoke. In the long term, GFI will produce airborne issues that will be mostly different, but, potentially, just as dangerous. Cashman’s 2021 NY superfund toxic waste barge sinking, is perhaps, more comparable.

Dow has yet to fully clean up the in-ground contamination and Cashman just wants to keep it buried. DEEP and the EPA do not seem to be forcing the issue with Dow or GFI, and it is Ledyard and Gales Ferry that are now required to live with this involuntarily. We do not need to enable another company to damage and setback decades of environmental recovery efforts, expense, and time. Worse yet, what if GFI were to irresponsibly walk away when the profits diminish? What would be left in our proverbial lap? I am troubled by the fact that Cashman has not been as forthright or transparent as they claim to be. That is on record and a serious red flag.

There is much to consider, and I fully understand and appreciate the burden of your position, Juliet, and all Planning Commission members. I trust and hope that all of you will seek independent, professional opinions, and engage in comprehensive research, in as many categories as possible, to help with the understanding of the true magnitude and consequence of the Cashman application. I would like to remind the commission that the Ledyard Town border extends to the middle of the Thames River, and we should also have a say in how the Thames River is treated. We have already been exposed to serious fuel spills.

The Cashman quarry proposal is a danger to this Town, both onshore and in the Thames River, which will not be able to be rectified for generations or, quite possibly ever, should it be allowed to go forward. The true magnitude of Cashman’s intentions is directly tied to a generally positive environmental movement: the creation of numerous New England & New York offshore energy producing wind farms. Still, this does not allow for carte blanche destruction here.



I am seventy-one, the Cashman proposal matters much, much, more, to the well-being of the Ledyard/Gales Ferry residents of tomorrow than to me. We should be considerate of our nearby Montville, Groton, and Preston neighbors, and all of Southeastern CT as well.

CLOSING

Please consider this: To deny Cashman is not to deny the process or operations they seek. It only forces Cashman to seek a better and more suitable (hopefully) location. They do exist. Mt Decatur at Gales Ferry is not the place for a quarry. Cashman's profit margins are not our responsibility. Our health and welfare are.

The tax revenue will never be nearly enough to cover the proposed damage to our Town.

Should the Planning Commission seek photographic images of this area to assist in your deliberations, I will be happy to provide some. Thank you all for your sincere considerations.

***“Continue to revise land use regulations to be pro-business
without sacrificing a commitment to environmentally sound development.”***

(Town of Ledyard Plan of Conservation & Development 2/27/2020)

All the Best,
Bruce G. Edwards
30 Bluff Road West,
Gales Ferry, CT 06335