



July 13, 2023

**Town of Ledyard**  
**Department of Land Use and Planning**  
741 Colonel Ledyard Highway  
Ledyard, CT 06339

Attn: Juliet Hodge

**RE: Response to Staff comments in email dated June 26, 2023 and Public Works Director comments dated June 28, 2023**  
**Gales Ferry Intermodal**  
**1761 and 1737 Route 12, Gales Ferry, Connecticut**  
**Commission Number 45JC206**

Dear Ms. Hodge:

We have prepared this letter on behalf of our client, Gales Ferry Intermodal, in response to the comments in your email dated June 26, 2023 as well as Director of Public Works comments. We have generally stated your comments below in italic following the same format, followed by our response in roman text.

**Comments in email from Juliet Hodge dated June 26, 2023**

1. ***Bond estimate for any of the stormwater elements.***
  - a. Response: The bond estimate is attached. In summary, the costs for soil erosion and sediment control and provision of full-site stabilization is as follows, broken up by building:  
6,000 SF Building - \$103,132.00  
10,000 SF Building - \$196,870.00
2. ***Building plans (mainly floor plans) or elevations.***
  - a. Response: Floor plans and elevations for the 10,000 SF and 6,000 SF buildings are being submitted with this letter.
3. ***GU letter***
  - a. Response: We have a will-serve letter from GU. Our Connecticut Licensed Architect and the Town of Ledyard Fire Chief have both been consulted with regard to fire protection and both parties agreed that neither building will be required to have sprinkler service. A new fire hydrant has been included on our plans, the specific location, of which, shall be further coordinated with the Town's Fire Marshal.
4. ***Comments from Steve Masalin, Director of Public works***
  - a. Response: We have addressed his comments. See the responses below in this letter.

**Loureiro Engineering Associates, Inc.**

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5. ***LLHD review***
  - a. Response: We have addressed the comments in the LLHD review letter dated May 9, 2023 and will be responding back to LLHD this week.
6. ***Given the size of the building, show one loading berth (9.4.3D).***
  - a. Response: Designation for one loading berth for the new 10,000 SF building has been added to the plan.
7. ***The Storm pipe trench requires removal of pavement within the laydown area. Is this permitted given the environmental issues/restrictions on disturbance?***
  - a. Response: Yes. If the requisite utilities will be installed before the Environmental Land Use Restriction (ELUR) is filed, they will be incorporated into the ELUR document. If installed after the filing of the ELUR, a release from the DEEP would be required, which includes the submission of a Soil Management Plan. As such, there are no restrictions associated with the installation of the utilities.
8. ***Spill containment for outside diesel tank and indoor waste oil tank. Provide spill prevention plan.***
  - a. Response: A Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for the Sterling operations in accordance with the Environmental Protection Agency (EPA) Template. Since this plan focusses primarily on spill prevention and training, an attachment to that plan detailing the actual spill response procedures has been included to address the town's concerns.
9. ***The construction trailer needs it own Zoning permit or add relevant language from Section 7.3 as a condition of approval.***
  - a. Response: Noted.
10. ***The commission might be inclined to restrict repair work on the pervious area where the future building is going. They may also want some sort of safeguard or condition about work that involves changing fluids on vehicles and/or machinery outdoors given the possibility of these fluids making their way to the stormwater system or elsewhere. Provide a plan for controlling spills.***
  - a. Response: The building expansion area previously shown as gravel shall be paved with asphalt to address this concern. Additionally and as noted above, a robust system of spill control and countermeasures will be in place to mitigate the potential for any spills and to ensure adequate response, should a release to the environment occur. This site and the related operations will be subject to the EPA SPCC rule.
11. ***Two conditions of approval:***
  - a. ***Stake out limit of disturbance area prior to start of construction.***
  - b. ***The proposed 100 ft plus buffer area and supplemental proposed landscaping shown on the site plan must be maintained in a condition that satisfies the purpose and requirements provided in Section 9.3 A-F (which includes intent outlined in 9.2C by reference).***
  - c. Response: Noted.

**Comments in memorandum from Steve Masalin, Public Works Director/Town Engineer dated June 28, 2023**

1. ***One Minor editorial issue. In paragraph 4.4 of the drainage report, discharge from the hydrodynamic separators is still identified as to subsurface chambers, as opposed to the new infiltration basin.***
  - a. Response: The minor edit noted. A revised drainage report can be provided if required.
2. ***Also, paragraph 3 of page 2 of the narrative mentions use of the existing area west of the new office building for various purposes. If these purposes includes the potential for discharge of vehicular fluids, there should be proposed measures to mitigate their conveyance into the existing drainage system that terminates at Allyn Cove. Clarification is necessary.***
  - a. Response: Please refer to response 8 and 10 above.

This response package is intended to address all the concerns expressed in your memorandum. We have amended the plan accordingly to provide the protections and screening enhancements aimed at addressing the concerns in your memorandum and those expressed by the local citizens. Please contact us if you need any additional information or if you have any further questions.

Sincerely,

**LOUREIRO ENGINEERING ASSOCIATES, INC.**



George F. Andrews Jr., P.E., L.E.P.  
Principal Engineer, Civil Engineering

CC: Steve Masalin, Public Works Director  
Alan Perrault, Gales Ferry Intermodal  
Chase Davis, Gales Ferry Intermodal  
Harry Heller, Heller, Heller & McCoy