



June 21, 2023

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

Attn: Juliet Hodge

RE: Response to May 11, 2023 Memorandum for the Record
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 memorandum dated May 11, 2023. We have stated your comments below in italic following the same format, followed by our response in roman text.

1. General:

a. Location Map should indicate Zone of the parcel and that of all property within 500 ft (per App. B-1).

The zones of properties within 500-feet of the site have been added to the Property Map on the Cover Sheet.

b. T2 survey based on actual field data required – particularly as you are proposing changes to the existing grade. (App. B-2 C).

The zoning regulations allow T-2 or T-3. The topography for this plan set is designated as a T-3 survey as noted in the map references, B.B. on Drawing C-1.

c. Sheet labeled 1 of 2 the CHA Site Plan dated 5/10/22 -- Note 6 states the Purpose of the Industrial Zone referencing Section 4.9A of the Zoning Regulations. The regulations have since been updated and the new "Purpose" is: To encourage the adoption, continuation and expansion of manufacturing, research, and industrial uses in a way that protects our natural assets.

A note has been added to clarify this correction as noted in the map references, C on Drawing C-1.

2. Notes Page:

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a. *Note 2 under Erosion and Soil Control Plan states that there are inland wetlands on the site and Note 3 states that “a large portion of the upland soils will be disturbed by earthwork activities. What wetlands are you referring to? Mr. Logan stated that the area marked wet area was not wetlands.*

Allyn’s Pond and the related inland wetlands flagged throughout the site are all on the same parcel. The area marked as Wet Area has indeed been documented as a non-wetland based upon several site visits and investigations by a Certified Soil Scientist. For purposes of clarity, this application contemplates no activity either in a regulated wetland or watercourse area or in any upland review area adjacent to a wetland or watercourse.

For clarification, the Erosion and Soil Control Plan notes have been moved to the Erosion and Soil Control Detail Sheet.

b. *The statement of intent under Construction Sequence as well as Note 5 in this same section also refer to wetlands and watercourses.*

The goal of the soil erosion and sediment control design is ultimately to protect the receiving wetlands and watercourses from any impacts resulting from the proposed improvements. While the site wetlands and watercourses will ultimately receive much of the runoff from this site, no discharges are proposed either in a regulated wetland or watercourse area or in an upland review area as defined in the Inland Wetlands and Watercourses Regulations of the Town of Ledyard. Notwithstanding the above, the Plan recognizes that the Applicant has an obligation to protect these resources whether or not a regulated activity is being conducted.

For clarification, the Construction Sequence notes have been moved to the Erosion and Soil Control Detail Sheet.

c. *On Sheet C16 please provide the following information per Section 9.11B of the regulations and Site Plan Check Sheet.*

o The name of the individual responsible for monitoring the plan with whom an inspector for the Town may contact routinely; and

o The plan map shall show the words: "Erosion and Sediment Control Plan" with space for the date and signature of the Chairman/Vice Chairman of the Zoning Commission or its agent.

The Soil Erosion and Sediment control Detail sheet is now Sheet C15. Both of these comments have been addressed on that sheet.

3. *10,000sf building vs. 20,000*



a. *Will there be any activity on the gravel area where the other half of the building will be? Is it gravel or are you pouring a slab. Would make a difference with respect to repair activity if the surface is pervious.*

The subject area would remain a gravel surface until the addition is constructed. The only activity performed in this area would be drive-through access to the 10,000 SF building via the overhead door.

b. *I assume there will be a change in the proposed lighting – as in some lighting on the western façade of the building. Are the wall pack lights full cut-off?*

The Photometric and Lighting plan has been updated. The wall packs are indeed full cut-off, dark sky luminaires.

4. *Regarding the proposed use:*

a. *The overall use is Mixed Use (Commercial Industrial) with an existing Industrial Use and a new proposed Repair Facility use. (It should be noted that an application for a multi-phased excavation use on the southern portion of the property is currently in front of IWWC). Both the existing Industrial and proposed Commercial Service (Repair Facility) are permitted in the Industrial Zone via Site Plan Approval. The fact that there is more than one principal use makes this a Mixed-Use development which is subject to Special Permit Approval (regardless of individual uses) so that the Commission can consider the cumulative impact of all the uses (existing and proposed) when determining compliance with the Special Permit Criteria and Site Development Standards.*

Mixed -Use Developments must comply with the supplemental regulations in Section 8.23 as well as all other applicable regulations for Site Development and Special Permit. Each subsequent addition of uses will be treated as a modification to the Special Permit for this Mixed-Use development should it be approved, and as such will have to be evaluated for compliance with the Special Permit requirements each time it is modified.

The areas proposed to be utilized per the Site Plan submitted include the pier area, the northern end of the property that is currently undeveloped in part, and the area identified as the “Laydown Area” where structures associated with DOW Chemical were located. Access is from Rte. 12.

The use that is being applied for falls under “MV, RV, Boat and/or Equipment Repair Facility” with associated (accessory) outdoor storage/repair area. This repair use is a type of Commercial Service that is identified in the table of uses separately as there are additional supplemental regulations for this particular type of Commercial Service.

While we recognize that Section 8.23 of the Zoning Regulations authorizes mixed use (commercial and industrial uses) in the Industrial Zoning District, there are no specific requirements contained in Section 8.23 other than the fact that the entire project (in this



case, the total 165 acre parcel) is to be treated as a whole both for permitted use compliance and bulk requirements. We believe that the specific compliance requirements which are being referenced are those contained in Section 8.24 of the Zoning Regulations for “motor vehicle, recreational vehicle, boat and/or equipment repair facilities”. As such, we are responding to evidence compliance with those requirements.

Section 8.24(A)(1) requires that repair facilities may not locate pick-up/drop-off areas or storage areas for such repair facilities in front of the principal building. All such area shall be located along the side or rear of the facility in compliance with the applicable setback requirements of the district. The modified site plan now incorporates two principal buildings as a component of the repair facility aspect of the redevelopment of this industrial property. Drop-off and pick-up (to the extent that the same applies to this use which is primarily a marine equipment repair use) will be located to the rear of the newly proposed 6,000 square foot building and will be screened from the adjoining residential neighborhood to the north of this property by the proposed 20,000 square foot building (to be developed in two stages) as well as the maintained 100 foot vegetated buffer. As such, the site layout for this use will be in compliance with this requirement.

8.24(A)(2). The revised site plan has incorporated a minimum 100 foot undisturbed buffer area between the proposed industrial activities associated with this use and the adjoining residential neighborhood to the north. No vegetation will be removed in this area and supplemental landscaping has been incorporated into the vernacular of the site plan as demonstrated by landscaping plan Sheet L-1. As mentioned previously, the current undisturbed buffer exceeds the minimum requirement contained in the Ledyard Zoning Regulations by 400%.

8.24(B). As discussed previously, this application contemplates the use of the foundations of the former Dow Chemical facility in this area of the property as a laydown area. A more descriptive enumeration of the uses in the laydown area is contained in the Supplemental Narrative being submitted by the Applicant to the Town of Ledyard Planning and Zoning Commission last revised as of June 20, 2023, a copy of which is attached hereto as Attachment A.

8.24(C). No additional permits are required from State agencies for this use as the proposed use is not regulated by the State of Connecticut Department of Motor Vehicles.

5. *With respect to the outdoor storage/repair activity:*

There are two applicable sections in the regulations that pertain to “outdoor storage” associated with commercial services and specifically repair facilities. One section applies to repair facilities and is found in the Landscaping and Buffering requirements in the Site Development Standards Section of the regulations (9.3), and Section 9.7 that applies in a more general sense for all uses that propose some associated outdoor storage of material, vehicles or equipment.



Section 9.3 requires Outdoor Storage Areas associated with repair facilities to be fully screened from view of any road or accessway and/or neighboring building/structure including parking areas.

9.7 states that Outdoor Storage of material and equipment is only allowed if the material and equipment are customarily accessory to the principal use (which in this case is the repair facility.) In the Industrial district, this area must be to the rear of the principal building. The important language in 9.7 is that the outdoor storage is accessory to something else – particularly a principal building. In 9.3, there is no restriction on where the outdoor storage area associated with the repair facility is, as long as it is essentially not visible. Should also note that the maximum height for materials stored outdoors is 25ft.

The narrative describes the proposed use in several places. Each is slightly different. This needs to be clarified.

Paragraph 1: “...re-development of the northwesterly corner”

P2: “...the industrial redevelopment of this site”

P2: “...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.”

This definition would indicate that the activity occurring outside includes the storage of materials, equipment and machinery utilized in conjunction with its marine contracting operations. This needs further clarification as well with respect to the type of material that could potentially be stored that is typically used in conjunction with marine contracting operations. That could be anything.

P8:”....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 is a little different. Still have the repair use... the material storage aspect, but then we have appurtenant facilities to support (undefined) “activities of the Applicant’s affiliate” engaged in marine contracting.

*What **exactly** are the “activities” that are being supported by the accessory “facilities” mentioned in this paragraph? Who is the Affiliate? What jobs are they contracted to do?*

P11: 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.



Repair support? What services would this include?

P13: The proposed use will support water dependent uses..... 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.

In this paragraph the language goes back and forth about whether the proposed use merely supports water dependent uses or actually is a water dependent use. Again the nature of the “support services” is not clear.

P14: 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.

*Here it is characterized as water dependent and the support services described include receiving and transporting goods and materials by vessel. This is a very different use than a Repair facility! This has all sorts of implications. What kinds of goods are coming in and being stored in order to be shipped back out? **This is a completely different kind of Commercial Service and not specifically being applied for based on testimony from the public hearing to date.***

P15: “the 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).

This definition identifies both the equipment and material storage and the repair facility as components of the proposed use – both associated with marine contracting and dredging activities. Again, what materials are we talking about here.

And finally, in P16: The project consists of the redevelopment of an existing industrially developed shorefront property...to provide support services which will be utilized to foster new water dependent uses.

This goes beyond a simple repair facility use and needs to be further clarified.

The revised site development plan meets the requirements of Section 9.3(E) of the Zoning Regulations. As indicated above, the vegetated buffer (undisturbed) along the northerly periphery of the site will be undisturbed for a uniform width of 100 feet. In addition, additional landscaping has been incorporated into the site development plan as evidenced by Sheet L-1. The Project Narrative (Attachment A) has been revised to better describe the proposed use of the outdoor storage area (laydown area).



The Applicant desires to emphasize the fact that this industrial site has been acquired due to its strategic location with the availability of a deep water pier, active rail service and location on a State highway which renders it most suitable for intermodal use as a shipping and receiving facility. While the current application does not request approval of this use, the Applicant highlights this fact to ensure that there are no misunderstandings or alleged misrepresentations when future applications are submitted for the intermodal use of this property.

The quoted sections of Attachment A highlight the fact that the repair facility being proposed with this application is associated with the water dependent uses of this property along its shoreline on the Thames River.

6. With respect to the laydown area:

What is the laydown area being used for exactly?

We know that the overall plan is to redevelop the Property as a “full-service industrial intermodal facility”, but that was described as a later phase. It seems the use of the laydown area is more related to a later phase that involves activities that have not been well defined yet, and that do not necessarily relate to the repair use at all.

The laydown area is bigger than the proposed principal building and surrounding pavement. Outdoor Storage is not a principal use in the Zoning Regulations; it is an accessory use. The argument could certainly be made therefore, that the proposed outdoor storage area used to store equipment related to the repair facility cannot be bigger than the main repair facility so as to appear to be the real principal use (though examples of this scenario are out there – i.e. Auto dealerships).

If the laydown area is only associated with non-repair support services and storage of goods and materials that have not been defined, then that is a separate use – a separate Commercial Service that would have to be associated with a principal building that was located in front of the laydown area in part to provide a visual buffer. If the laydown area is to be used to process dredge material in the future – that would be considered manufacturing (most likely) and the material storage area would still have to be behind the buildings associated with the full redevelopment of the site. The applicant is not there yet.

The use the Commission is being asked to approve has to occur in the table of uses and comply with all applicable regulations/criteria. The repair facility is a permitted principal use. Commercial Services (general/unspecified) is also a permitted principal use which is then clarified during the application process with respect to what type of service is being proposed.

The applicant has not fully clarified what activity is being proposed in this instant application and the use described in the narrative is inconsistent throughout.



Clearly identifying the use being applied for is imperative because the Commission needs to decide the appropriate amount of buffering needed between the proposed use and the neighboring residential property based on the details of the proposed activity. The only chance to preserve the existing 3 acre buffer that has been there since the beginning when Dow developed the site, is now. Without knowing what will occur in that laydown area, the Commission cannot possibly determine if the criteria in Section 11.3.4 including determining whether (1) 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; or (2) that no adverse effect would result to the property values or historic features of the immediate neighborhood; or (3) 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; or (4) whether 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.

Without knowing the exact activities in the laydown area, the Commission would also not be able to determine whether the Site Development Standards relating to access, parking, lighting, landscaping, buffer, outdoor storage, waste disposal, stormwater management, etc. have been met – or if there will be any impact to Allyn’s Pond or the other Coastal management Resources identified. The Laydown Area abuts Allyn Pond, therefore activity proposed in that area could in fact be potentially regulated by the IWWC.

I would also note that the laydown area is not actually appropriately screened if it is going to be used for equipment storage.

The proposed laydown area does not extend into any upland review area regulated by the Town of Ledyard Inland Wetlands and Watercourses Commission. The descriptive use of the laydown area has been refined in the revised Project Narrative attached to this response letter as Attachment A. Since no nighttime use is proposed in the laydown area (or associated with the proposed use of the Sterling Building, regional office and related facilities), no lighting is proposed in the laydown area. The laydown area is effectively screened by both the 6,000 square foot proposed building (from Route 12) and the residential neighborhood to the north by the proposed 20,000 square foot Sterling Building, 100 foot undisturbed natural buffer area and landscaping incorporated into the landscaping plan. The Applicant believes that the revised site plan far exceeds the requirements of the Ledyard Zoning Regulations with respect to any perceived adverse impacts on the adjacent residential neighborhood to the north.

7. Coastal Area Management portion of the narrative:

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

This doesn’t seem to be entirely true if equipment and material are arriving by ship, off-loaded and driven across the property to the Sterling Building area. Nor would it be true if the laydown

area is being used for some “activity.” There is more to the application than just building a 10,000sf building, stormwater system, septic and parking area in the shorelands. Use of the laydown area may not be “development” but depending on what it is used for, there could be an impact to the coastal resources which includes Allyn Pond.

The Applicant anticipates no adverse impact to any coastal resources, as evidenced by the Narrative attached as Attachment A. Storage in the laydown area will be accomplished on the existing foundations and associated impervious areas which remain from the prior industrial use. The storage use is largely inert and the storage area is impervious. This area is removed from Allyn’s Pond.

8. Character of the Neighborhood:

ARCHITECTURAL CHARACTER, AND HISTORIC AND LANDSCAPE PRESERVATION

9.9.1 General Provisions: The overall character of the proposed site layout and the architectural character of proposed structures shall be designed, to the extent feasible, to protect property values in the neighborhood and the Town; preserve the existing historic character in terms of scale, density, architecture, and materials used in construction of all site features; protect the existing historic patterns of arrangement of structural and natural features, including circulation patterns; and preserve public access to scenic views and vistas and to water courses.

9.9.2 Encouraged Materials and Practices: ... Preferred façade materials are brick, stone, and wood, including narrow-width siding, clapboards, wood shingles, or a reasonable equivalent. Metal, unfinished concrete, and concrete block, as well as asphalt siding, are discouraged.

...Architectural details characteristic of the particular style and period proposed should be incorporated into the design for new construction and should relate harmoniously to adjacent buildings.

...Large structures should have well-articulated façades to reduce the appearance of significant bulk. Provision shall be made to coordinate site architecture with that of the surrounding district. Rooflines should be varied to provide architectural interest.

These standards are not required – only “encouraged.” As with most industrial buildings in particular, the architectural style and building materials generally do not align with the preferred materials and style identified in the Site Development standards or “relate harmoniously” to adjacent buildings especially if the adjacent buildings are residential. In recognition that in this case the overall development of the parcel is and will continue to be commercial/industrial, the only way to really satisfy the standards identified in Section 9.9 is through building placement, landscaping and buffering. The Commission must determine whether the landscaping and buffering and placement are adequate to protect at least the abutting residential neighborhood.



The narrative states that the existing vegetated buffer areas have been maintained between the area of the proposed industrial development and the adjoining property to the north. That is a bit of an exaggeration as most of the vegetation in the referenced buffer area is to be removed.

The plans have been amended to provide an undisturbed 100-foot buffer between the new building and the residentially zoned properties located to the north. Additional landscape buffering is also included in the Landscaping Plan to further buffer from the adjacent properties. To address other staff review comments, the Applicant has elected to incorporate a second building, containing 6,000 square feet, more or less, into the site development plan for the project which will, inter alia, constitute a regional office for the Applicant's marine contracting and dredging businesses. This building will be removed from Route 12 and will be well screened by the existing vegetation on site.

9. Refuse Storage

a. Are there dumpsters proposed on the site? Locations and detail must be shown to determine compliance with Section 9.6 of the regulations.

A dumpster is included in the plan set. The related enclosure is included on Drawing C-12.

10. Utilities Plan

*a. Per Section 11.2.1H, A Utilities Plan shall be submitted to demonstrate the adequacy of on-site water supply and sewage disposal facilities to serve the needs of all proposed uses. The Utilities Plan should also include comment on the availability of water for any fire-fighting needs that may arise in connection with the proposed uses. The applicant must submit a copy of the Utilities Plan to the Town's Director of Health and Fire Marshal no later than the date the application is filed with the Commission. **Was this done?***

The plans were submitted to the Town's Director of Health, Joseph Blanchard, on April 12, 2023. A copy of these revised plans will be emailed to Jim Mann, Fire Marshal today.

b. Notes on the Utility Plan only state that the domestic water service and fire protection service require Groton Utilities Approval and will be sized prior to construction which does not satisfy the requirement above that the applicant demonstrate that there is adequate water supply.

The estimated water demands and fire protection information is being calculated. Once we have all of that information then the plans and information will be submitted to Groton Utilities.

c. Was the Application submitted to LLHD for approval? Have they reviewed the Septic System? Response still in progress.

The plans were indeed submitted to LLHD and a subsequent meeting with their Sanitarian occurred to clarify some questions. It is our understanding that a letter from LLHD supporting the use of a subsurface Sewage Disposal system for this proposed development was submitted to the Town.

11. *Special Permit Criteria:*

In considering an application for a Special Permit, the Commission shall evaluate the merits of the application with respect to all of the following criteria that the Commission may determine are relevant to the application. To the extent the Commission finds such criteria applicable, the applicant shall have the burden to prove:

*A. that the application is materially in conformance with all applicable provisions of these Regulations, including, but not limited to, the Site Design Requirements in Chapter 9, and that the standards for approval of any accompanying Site Plan application have been met; **Additional information needed. Buffering may not be adequate depending on the use of the laydown area.***

The plans have been revised to provide 100-foot undisturbed buffer along the norther property line adjacent to the residential zone. This revision, coupled with the reorientation of the building allowed maintenance of a 100-foot natural buffer primarily in the northeast corner of the site. Additional landscaping and screening are proposed in accordance with the Landscaping Plan.

*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; **This phase not expected to generate traffic, though not all proposed “support services” activity detail for this phase has been provided.***

Traffic which will be generated by the use contemplated by this application will be approximately 8 to 10 vehicle trips entering the site and leaving the site daily; i.e. employees of the Applicant who are on site and working. Material and equipment deliveries are anticipated one to two times per week. As indicated previously, the application parcel is located on a State highway. The amount of traffic which will be generated by this use is de minimis.

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; Not enough information on the typical activities has been provided. Consider sound proofing the Sterling Building and maintain as much buffer to reduce noise impact from outdoor activity.

The Sterling Building will be fully insulated thereby providing a significant reduction in noise generated inside the facility. The applicant has quadrupled the 25-foot minimum buffer allowed and this area will remain completely undisturbed in its natural condition.



The applicant has further proposed additional landscaping along the northern and eastern bounds of the proposed new development to further screen and attenuate sound.

What are the hours of operation?

Hours of operation will be 6:30 a.m. to 4:30 p.m.

Noise levels of typical machinery when operating?

It is noteworthy that heavy equipment will occasionally be moved throughout the site but typically at a slow speed and not under load as when working a construction site, so the DB levels are considerably lower than equipment actively engaged in soil or sediment movement on a jobsite.

Please review criteria in Section 9.2C (Performance Standards) as I do not feel the Applicant has demonstrated that standards have been met.

Equipment laydown and repair/maintenance activities will be limited to primarily asphalt and concrete surfaces to control dust.

No offensive odors or noxious, toxic or corrosive fumes or gases shall be emitted into the air.

Noise from the site has been managed by revise operating hours and by significantly increasing the residential buffer to four times the minimum included in the regulations. As noted above, equipment engines would be operated during movement or maintenance activities only. The equipment will not be under load and as such the engine noise will be considerably less than a typical active construction site.

Once construction of the site is complete, no vibration disturbance is expected from the proposed activities.

The site is illuminated with full dark-sky luminaires thereby managing light pollution and maintaining the illumination to within the site as demonstrated on the Photometric and Lighting Plan.

As required to obtain a building permit, the use and the proposed infrastructure shall conform to the fire safety code of the State of Connecticut, the regulations of the Town of Ledyard, and any other applicable regulations.

D. that no adverse effect would result to the property values or historic features of the immediate neighborhood; Commission needs to determine if enough is being done to protect the neighborhood from possible nuisances.



The applicant has quadrupled the minimum buffer allowed in the zoning regulations and provided additional landscaping to screen and attenuate noise levels emanating from the site. Hours of operation have been adjusted to reduce the duration of site activities and the proposal of aggregate storage has been eliminated from this application. Activities will be limited to primarily asphalt and concrete surfaces to control dust. The buildings are well screened and distanced from the residential neighborhood.

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; **The use of the site will certainly intensify from historic and current industrial use. The scale of the new building and future buildings are also out of scale with the immediate neighborhood which includes residences- Commission should determine if enough is being done to protect the neighborhood.**

The Applicant has quadrupled the minimum buffer allowed in the zoning regulations and provided additional landscaping to screen the site from the neighboring property and Route 12. As such, the scale and architectural design of the proposed buildings are well masked from the adjoining properties thereby mitigating any deleterious degradation in architectural value. The site is a historic industrial site that has historically operated as such. The intensity of the use proposed will clearly be more than this site sitting idle with no industrial activity, however, the site was an active industrial site for many years. We are not able to gauge the intensity of the proposed use against the historical industrial operations and question the assertion above.

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; and More information is needed about the activities occurring outside to make a determination of compliance.

CGS §22a-19 allows certain qualified parties to intervene in a permitting proceeding in which it is alleged that the activities proposed are reasonably likely to unreasonably pollute, impair or destroy the public interest in the air, water or other natural resources of the State. The proposed use is a repair facility. It is not located in proximity to any regulated resources. There is no evidence of any endangered, threatened or species of special concern in the area of the proposed use. The use is much less intense than the historic manufacturing use which has been made of this property notwithstanding the fact that it is occurring in an area of the property not previously utilized for industrial activity.

G. that all proposed uses and structures would be consistent with future development as identified and envisioned in these Regulations and the Ledyard Plan of Conservation and Development. The Cashman property is Ledyard's primary industrial site and Cashman has outlined a future build-out that could greatly benefit the town economically. The reuse of underutilized properties is highly desirable provided the new use does not pose issues of its own.



I feel that there is a great opportunity to create a quality development that protects everyone's interests.

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

Attachments – Attachment A – Revised Supplemental Project Narrative

CC: Alan Perrault, Gales Ferry Intermodal
Chase Davis, Gales Ferry Intermodal
Harry Heller, Heller, Heller & McCoy