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October 15, 2024

Mr. Justin DeBrodt, Chairman  
Inland Wetlands and Watercourses Commission  
Town of Ledyard  
741 Colonel Ledyard Highway  
Ledyard, Connecticut 06339

RE: Application PZ11-SUP and PZ#12-CAM  
Gales Ferry Intermodal, LLC  
1737 & 1761 Connecticut Route 12  
Gales Ferry, Connecticut

Dear Mr. DeBrodt and Members of the Inland Wetlands and Watercourses Commission,

I have been retained by the Citizens Alliance for Land Use to perform a third-party civil engineering review of the above referenced project for the application currently before the Ledyard Planning and Zoning Commission. Based upon the review of the plans, it is my professional opinion that a new application must be submitted to the Ledyard Inland Wetlands and Watercourses Commission based upon the following comments.

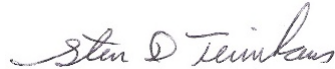
**Executive Summary:**

- A. The stormwater management basins and design computations are not in compliance with either the 2004 or the 2023 CT DEEP Storm Water Quality Manual and will result in increased pollutant loads being discharged from the site which will be discharged to delineated inland wetlands. These pollutant loads include total suspended sediment, metals and hydrocarbons, all of which will adversely affect the water quality in the wetlands as well as their long-term functionality.
- B. The erosion and sedimentation control plan are not in compliance with the CT DEEP 2023 Guidelines for Soil Erosion and Sediment Control and will result in the discharge of turbid water during the excavation period to the delineated inland wetlands.
- C. A new component of this application is the use of water to control dust from the mining activities. There are no provisions for how excess water from the dust control application will be treated and how it will be discharged from the site during the active mining operation.
- D. The design of the Stormwater Management system does not comply with the Town of Ledyard Ordinances Section 300-016 and 300-017.

E. I have read the letter from CLA Engineers which stated that CLA does not believe the current proposal for the Cashman property needs to go back to the Inland Wetlands Commission. I strongly disagree with this assessment as the inadequate stormwater basins will result in the discharge of increased non-point source pollutant loads to the downgradient wetlands and ultimately the Thames River.

My current CV is attached for the record. Please contact my office if you have any questions concerning this review.

Respectfully submitted,  
Trinkaus Engineering, LLC

A handwritten signature in cursive script that reads "Steven D. Trinkaus".

Steven D. Trinkaus, PE