

December 18, 2024

Chairman Wood and Members of the Planning and Zoning Commission, Town of Ledyard:

Save the Sound—a nonprofit organization representing over 5,000 member households and 19,000 activists throughout the Long Island Sound region with a mission to protect and improve the region's land, air, and water—offers the following comments regarding PZ#24-8SUP & PZ#24-9CAM, applications by Gales Ferry Intermodal.

The Cashman/GFI proposal for an excavation/quarrying operation at 1737 and 1761 Route 12 in Ledyard, Connecticut poses a potentially significant threat to the Thames River, an important tidal estuary of Long Island Sound, and its surroundings. We are particularly concerned about the following:

- The proposal's stormwater management and erosion and sedimentation control plans have been deemed deficient by respected professional engineer Steven D. Trinkaus; in light of this information, we strongly urge the Commission to require Cashman/GFI's revised proposal to be reviewed by the town's Inland Wetlands Commission.
- The removal of acres of trees on forested Mount Decatur will have negative impacts. Trees not only prevent erosion and filter stormwater, issues noted above; they also store carbon, release oxygen, and provide a cooling effect within forested areas and in surrounding areas—all important functions that help to mitigate the effects of climate change.

The Thames River's watershed is the third largest to drain into Long Island Sound, and the health of the Thames River is a concern for the entire Long Island Sound region. For that reason, we recommend that the Commission consult with statewide agencies for further expert advice, including the CT Department of Energy and Environmental Protection regarding the state Coastal Management Program, as well as its Fisheries and Wildlife Divisions; the state Department of Public Health regarding concerns about source water protection including private wells and aquifers; the state Department of Agriculture's Bureau of Aquaculture; and the Connecticut Council on Soil and Water Conservation.

Save the Sound urges the Commission to take steps to mitigate the environmental harms posed by this proposed project and, if that cannot be done, deny this application. We thank you for your careful attention to our comments and those of our colleagues and fellow citizens who so deeply value the Thames River and this important piece of the Long Island Sound watershed.

Sincerely,

Kathy Czepiel Land Protection Manager