

**NARRATIVE TO ACCOMPANY SITE PLAN AND COASTAL SITE PLAN  
MODIFICATION APPLICATION OF GALES FERRY INTERMODAL, LLC TO TOWN  
OF LEDYARD PLANNING AND ZONING COMMISSION FOR APPROVED 6,000  
SQUARE FOOT MARINE REGIONAL OFFICE AND MAINTENANCE FACILITY**

**DATE: MAY 6, 2024**

The application submitted with this Narrative is submitted for site plan modification and coastal site plan modification approval for the relocation of a 6,000 square foot building previously approved under Applications PZ#23-4SUP and PZ#23-5CAM for use as a regional office and marine maintenance facility in the northerly portion of the real property of Gales Ferry Intermodal, LLC (the “Applicant”) located at 1761 Connecticut Route 12 in Ledyard, Connecticut (the “Property”). The Property is the site of the former Dow Chemical manufacturing facility, and has been committed to industrial use since at least the mid-19<sup>th</sup> century. A portion of the Property is currently used for the manufacture of Styrofoam products by Americas Styrenics, a tenant of the Property. The Dow Chemical facilities at the Property terminated their manufacturing existence circa 2011 and the former Dow Chemical manufacturing buildings have been removed from the Property. The Property was acquired by the Applicant on May 19, 2022 with the intent to redevelop the Property as a full service industrial intermodal facility taking advantage of (i) its excellent highway access (ii) the presence of rail service including a rail siding and (iii) deepwater access on the Thames River together with the presence of a reconstructed and reinforced pier suitable to accommodate industrial vessel traffic.

On August 10, 2023, the Ledyard Planning and Zoning Commission (hereinafter “Commission”) approved the Applicant’s site plan, coastal site plan and special use permit applications for the siting of a 10,000 square foot marine maintenance facility (with the potential to expand to 20,000 square feet) and a 6,000 square foot regional office and marine maintenance facility on the Property. The instant application seeks permission to relocate the 6,000 square foot proposed regional office and marine maintenance facility only to the southeast from its originally approved location; and, in conjunction therewith, reconfigure the site infrastructure to support that relocation.

Submitted herewith and constituting a component of the application for site plan modification and coastal site plan modification approval is the site development plan prepared by Loureiro Engineering, Inc. entitled “Gales Ferry Intermodal Site Plan Application 1761 Route 12 Gales Ferry, Connecticut 06335 April 25, 2024 Property Owner/Applicant: Gales Ferry Intermodal LLC 549 South Street Quincy, MA 02169 Prepared By: Engineer: Loureiro Engineering Associates, Inc. 100 Northwest Drive Plainville, Connecticut 06062 - Phone: 860-747-6181 - Fax: 860-747-8822” consisting of Sheets 1 of 19 to 19 of 19 (the “Site Development Plan”).

After much consideration, the relocation of the proposed 6,000 square foot building which will accommodate the Applicant’s regional office and a small marine equipment maintenance facility results in its placement in a location which is more advantageous than the originally approved location, inter alia, reducing infrastructure costs for the development of the building and associated site improvements. The proposed relocation of this building is also further removed from the residential neighborhood along River Road to the north. This phase of the redevelopment



of the Applicant's industrial site will provide for the development of a facility which will provide support services by way of equipment and material storage and a repair facility for the Applicant's affiliate's marine contracting and dredging activities as well as the site for a small regional office.

Coastal resources located on the site (with the site being defined as the entirety of the Property) include coastal hazard areas, coastal waters and developed shorefront. The following coastal use policies are applicable to the proposed project: stormwater management and water dependent uses. The following coastal resource policies are applicable to the proposed project: general resources and developed shorefront.

The proposed use will support water dependent uses that make use of existing developed shorefront, including the presence of an existing reconstructed and reinforced pier which has the ability to accommodate large scale commercial and industrial vessels. No adverse impacts are anticipated to coastal resources resulting from the contemplated development. The proposal is a reuse of a present and prior industrial property. 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.

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.

The project will provide support services for the use of the existing pier on the Property and encourage water dependent uses that will utilize the existing pier for both shipping and receiving of bulk materials by barge and vessel. The proposed development will not have adverse impacts on water dependent uses as it reuses an existing vacant industrial portion of the Property with an existing deepwater pier to provide support services for other uses which will take advantage of the pier and deep water present along the shorefront of the Property in support of water dependent uses for shipping and receiving of materials.

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. Stormwater treatment systems have been included in the design for the redevelopment of the project to improve the quality of stormwater discharges consistent with the recommendations contained in 2023 Stormwater Quality Manual promulgated by the State of Connecticut Department of Energy and Environmental Protection. In conjunction with this application, no activity is proposed waterward of the Coastal Jurisdiction Line. The Applicant submits that there are no adverse impacts to coastal resources which require mitigation in conjunction with this application.

As with the prior placement of the 6,000 square foot building, the relocated building will be sited entirely on shorelands and will be further removed from any coastal resources than the prior approved placement of this building and its associated infrastructure.

The project is not located within a designated federal flood hazard area.

**GALES FERRY INTERMODAL, LLC**

By:   
Harry B. Heller, its Agent, duly authorized