

# CLA Engineers, Inc.

Civil • Structural • Survey

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July 15, 2025

Justin DeBrodt, Chairman  
Ledyard Inland Wetland and Watercourses Commission  
C/O Liz Burdick, Director of Land Use & Planning  
Town of Ledyard  
741 Colonel Ledyard Hwy  
Ledyard, CT 06339-1511

RE: Third Party Review  
IWWC#25-5SITE 19,29,39 Military Highway, Gales Ferry Multifamily Application  
Ledyard, Connecticut  
CLA-7925

To the Commission:

CLA Engineers, Inc. (CLA) is in receipt of the Summary Response Letter, dated July 10, 2025 provided by Bohler Engineering. We concur with Bohler's statement that comments from the previous CLA letter dated May 29, 2025, had been addressed with the exception of test pits. Items #4, #5, and #27 from the previous CLA letter recommended additional test pits and soil data for the site and stormwater management system design.

Chapter 10 of the 2024 CTDEEP Connecticut Stormwater Quality Manual (Stormwater Quality Manual) provides guidance for soil evaluations for stormwater infiltration systems including the number of test pits and infiltration (permeability) test for design of these systems. The soil evaluations can be done by a qualified professional at any time of year.

The soil evaluation helps document that the given site can support the stormwater management design for the project. Soil characteristics, depth to ledge, seasonal high groundwater depth, permeability, etc. governs the proposed infiltration basin and infiltration chamber sizing and design. Without this information CLA cannot determine if the soils onsite can fully support the proposed stormwater management system design. For example, the bottom of the western side of "Proposed Infiltration Basin 1E" is proposed at approximately 16-feet below existing grade. No soil information is provided along this western edge to determine if the basin may be in a ledge cut or if it may intercept the groundwater table that could both impact the infiltration basin size and design.

In our opinion, additional site soil evaluation should be performed to document the existing soil conditions and to substantiate the stormwater management system design. Without this information CLA cannot confirm that the stormwater management features are appropriately sized

in accordance with the Stormwater Quality Manual, and it cannot be determined if the project would have an impact on the inland wetlands.

Thank you for the opportunity to provide this review. Please feel free to call us at our office or email [khaubert@claengineers.com](mailto:khaubert@claengineers.com) or [brusso@claengineers.com](mailto:brusso@claengineers.com) with any questions or comments.

Very truly yours,  
**CLA Engineers, Inc.**

A handwritten signature in blue ink, appearing to read "K Haubert".

Kyle Haubert, P.E.

A handwritten signature in blue ink, appearing to read "Robert Russo".

Robert Russo C.S.S.