



October 24, 2023

Town of Montville Planning and Zoning Commission
c/o Liz Burdick
Town of Montville Planning Director
310 Norwich-New London Turnpike
Uncasville, CT 06382

Subject: 125 Depot Road, Uncasville CT – Transloading and processing of sand, silts and clay for marine construction and maintenance projects

Dear Commissioners:

Thank you for notifying the Land and Water Resources Division (LWRD) of the Coastal Site Plan Application project that includes transloading and processing of sand, silts, and clay for marine construction and maintenance. Moreover, silts and clays are proposed to be improved and processed by mixing a cementitious product to stabilize the same for on-road transportation and on-land use. We have reviewed the proposal for consistency with the policies and standards of the Connecticut Coastal Management Act (CCMA), and we offer the following comments and concerns for the Commission's consideration.

Water Dependent Uses

It is noted in the application materials that the proposed use will involve utilizing the existing pier for receiving dredged materials, cement, and other deliveries by barge for processing the noted materials onsite and for transport offsite by rail and/or truck. Therefore, the water-dependent use of the subject site is not proposed to be changed.

Stormwater & Water Quality

In order to assure the proposed activity will not impact water quality, we recommend the Commission assure that materials are not stored directly adjacent to the river's edge. The proposed containment areas and materials handling/transporting systems should be evaluated to ensure that they are appropriately sized for the quantity of materials to be stored or dewatered in this area to protect water quality. Furthermore, we recommend that the installation and maintenance of adequate sedimentation and erosion controls for the work be made conditions of coastal site plan approval.

We also strongly recommend that the applicant coordinate with Karen Allen, supervisor of the DEEP's Stormwater program, at Karen.Allen@ct.gov to determine whether permitting is required for the proposed activities.

Activities in a FEMA-Designated Area

We note to the Commission that it appears that there are proposed activities in an area designated as a FEMA AE (EL 11) zone. Therefore, the applicant must demonstrate to the Commission's satisfaction that the project complies with FEMA standards. Please be aware that any fixed equipment should be elevated to Base Flood Elevation (BFE) plus 1 foot, or 12 feet per local zoning and state building code. Additionally, a rigorous Flood Contingency Plan to move

wheeled equipment, other equipment, and stockpiled material to higher ground must be incorporated, since portions of the site and operations will be well below the BFE. All heavy equipment, stockpiles, and chemical and fuel storage should be moved upland in the event of forecast storm events or otherwise be raised, anchored, and/or flood proofed.

Additionally, it appears that the application materials note that portions of the existing flood hazard area are proposed to be filled under the present phase. However, the application materials reviewed are operational plans, and no grading plans were provided. If any filling is proposed to remove the site from the floodplain, the applicant should pursue a formal Letter of Map Revision based on Fill (LOMR-F) from FEMA and in accordance with other applicable standards. Please contact DEEP's FEMA coordinator, Diane Ifkovic at Diane.Ifkovic@ct.gov should you have any questions.

DEEP Permitting

The application materials note that waterside improvements are anticipated as part of the project. Please note that activities proposed in tidal wetlands and/or waterward of the Coastal Jurisdiction Line (CJL) require authorization from our office prior to the commencement of the work. The applicant should be aware that any work in regulated areas of the State which has not been authorized by a valid license is a violation of state law and subject to enforcement action by the Department. Please contact Darcy.Winther@ct.gov, Supervisor of the LWRD Regulatory East Region should you require additional information.

Finally, we recommend that the applicant coordinate as appropriate with DEEP's Waste Division for any additional approvals or modifications that may be necessary for the proposed dredge material handling on the upland as outlined in the subject materials. It appears that the Approval of Demonstration Project No. 202107450 issued in January of 2022 allows the processing of the dredged materials on a barge docked at 125 Depot Road and only allows for the storage and loading of the treated materials on the property.

We hope these comments have been helpful to the Commission. Should you have any questions regarding this letter or any other coastal management or Long Island Sound matter, please feel free to contact me.

Sincerely,



Eimy Quispe
Environmental Analyst
Land and Water Resources Division

EQ/q