



Ian Cole, LLC

Professional Registered Soil Scientist / Professional Wetland Scientist

PO BOX 619

Middletown, CT 06457

Itcole@gmail.com

860-514-5642

January 7, 2025

Ms. Stacy Radford
Zoning & Wetland Officer
Department of Land Use & Development
Town of Montville
310 Norwich-New London Turnpike
Uncasville, CT 06382

**Re: 24IWC11 – 349 Maple Ave. LLC
375 Maple Ave. and Route 163
Montville, CT
Site Improvement Plan and Stormwater Management Report Review**

Dear Ms. Radford and Commission Members:

On behalf of the Town of Montville, I coordinated review efforts with Boundaries LLC for the above referenced wetland application. I completed a site visit and reviewed the subject site plans and wetland application to construct a new trailer storage facility by the Rand-Whitney Company at 375 Maple Avenue. I offer the following comments for the Town of Montville Inland Wetland Commission consideration relative to assessing the significance of impacts to the regulated areas.

The following documents were reviewed:

- Inland Wetlands Application.
- Project Cover Letter.
- Stormwater Management Plan.
- Wetland Delineation Report.
- Site Improvement Plan, 375 Maple Avenue/Route 163, Town of Montville, Connecticut 06382, Prepared for 349 Maple Ave. LLC, 410 Maple Avenue, Montville, Connecticut 06382, December 16, 2024.
- Town of Montville Inland Wetlands and Watercourse Regulations (October 19, 2017)

The following comments or questions are based on a site visit completed on January 3, 2025, discussions with Boundaries, LLC and the above documents:

1. I have reviewed the wetland boundary as identified and flagged by Mr. Robert Russo and Mr. Joseph Theroux and I am in general agreement with the regulated boundaries as depicted on the subject site plans. Although the wetland boundary is readily identifiable to most professionals, for the Commission's benefit and for construction purposes, it is suggested before the start of construction that the Project's surveyors stake out the limits of disturbance and re-flag the wetland boundary with new markers, so the wetlands are clearly marked in the field, as many of the flags were missing or degraded making them difficult to recover at the time of my field visit on 1-3-2025.
2. Consideration should be given to additional native shrub plantings between Stormwater Basin #1 and the edge of Rockland Pond. As depicted on the site plans the area would be essentially cleared of vegetation to the ponds edge and replanted with New England Roadside Seed Mix. There is an opportunity to soften the ecotone between the development's edge and the pond which should be evaluated by the applicant.
3. Because the site was previously utilized to stockpile miscellaneous landscaping material including woody debris and other earthy materials, consideration should be given to including an invasive species monitoring plan to ensure no invasive species are propagated along the wetland boundary where they currently do not exist. Notable patches of Knotweed and mugwort were observed intermittently throughout the property and the activity of converting the woods to meadow habitat has the potential to propagate sun-loving invasive plant species as the tree canopy will be removed and replaced with low-growing vegetation.
4. It is my understanding the Project has formally requested a Jurisdictional Determination (JD) from the United States Army Corps of Engineers (USACE). It has been my experience that the JD process can take upwards of 1 year or more to receive a formal ruling from the USACE. In the interim the Commission should request the Applicant, or their representatives to provide a professional opinion as to the applicability of additional State and/or Federal Jurisdiction over the proposed 9,496 SF of fill to the intermittent watercourse that extends from the 30" Sharp Hill drainage pipe outlet. It is my professional opinion that the subject drainage feature may not be regulated by the USACE, due to its site setting, isolation, ephemeral nature, and origin of creation. For the Commissions understanding and context the subject watercourse has very little stream and bank development and is very shallow in nature. Furthermore, I would expect given the nature of the watercourse, the subject drainageway is likely biologically inert and does not provide any substantial stream habitat due to lack of persistent flow, lack of wetland vegetation, and overall site disturbances.

5. I concur with the additional erosion and sediment controls recommended by Boundaries which include incorporating a double row of sediment barrier where construction activity is located within 50-feet of the limit of inland wetlands per the DEEP Construction General Permit.
6. It is my professional opinion based on a review of the proposed activities and the Town of Montville's definition of a "Significant Activity" that the relocation of the Sharp Hill Drainage which will require filling 9,496 SF of a man-made intermittent watercourse is a significant activity, as the proposal is significantly changing the dynamics of the watercourse, albeit one that is man-made. The project is proposing industry standard water quality treatment which can be enhanced based on the additional recommendations of Boundaries LLC and the suggestions provided in this letter report. These additions should be considered to help mitigate a major effect or negative impact to the overall wetland resources and environment.

In closing while the proposed activity is significant in the fact it will be relocating a man-made watercourse and will result in the permanent filling of a watercourse it likely will not have a major effect or negative impact due to the nature of the subject feature and the inclusion of design features which will replace and/or has the opportunity to enhance the existing functions of the watercourse slated to be relocated. In my professional opinion, if the subject application includes the additional recommendations the regulated activities:

1. Should not result in an adverse impact to Rockland Pond or Oxoboxo Brook;
2. Are consistent with and satisfy the statutory factors for consideration provided by Section 22a-41 of the Connecticut General Statutes; and
3. Are consistent with and satisfy the criteria for consideration provided by the Town of Montville's Inland Wetlands and Watercourses Regulations.

If you have any questions or comments, please do not hesitate to contact me at itcole@gmail.com or (860) 514-5642.

Sincerely,



Ian T. Cole
Professional Registered Soil Scientist
Professional Wetland Scientist #2006

WETLAND REVIEW SITE PHOTOS

IAN COLE, LLC

JANUARY 3, 2025

**RAND-WHITNEY RECYCLING, LLC – NEW
TRAILER STORAGE AREA**

375 MAPLE AVENUE

MONTVILLE



Photo 1: Sharp Hill Drainage Area



Photo 2: Sharp Hill drainage discharge point. Note sediment buildup.



Photo 3: General channel conditions of the Sharp Hill drainage as it migrates east towards Oxoboxo Brook. Note lack of stream development and lack of wetland vegetation.



Photo 4: General conditions along Oxoboxo Brook



Photo 5: Rockland Pond



Photo 6: General upland conditions slated to host the trailer storage area



Photo 7: Wooded area that will be converted to parking / stormwater quality basins. Note small patch of Knotweed in foreground of photo.