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***Ian Cole, LLC***

***Professional Registered Soil Scientist / Professional Wetland Scientist***

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May 6, 2025

Ms. Meredith Badalucca  
 Assistant Planner  
 Department of Land Use & Development  
 Town of Montville  
 310 Norwich-New London Turnpike  
 Uncasville, CT 06382

**Re: 25SUB3 – Daniela Gjergjaj  
 Map 001 Block 007 Lot 00A  
 Silver Falls Road  
 Montville, CT  
 Re-Subdivision Plan Review**

Dear Ms. Badalucca,

At the Town of Montville's request, Ian Cole LLC completed an environmental evaluation of the site and a review of the above referenced wetland application for compliance with the Town of Montville's regulations. In addition to a desktop study and file review, an on-site field inspection of the 19-acre site was completed on May 5, 2025. 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:

- Subdivision Application.
- Inland Wetlands Application.
- CLA Soil Scientist Report.
- CLA Drainage Report.
- PLAN SET: Residential Resubdivision, Map 001-Block 007-Lot 00A Silver Falls Road, Town of Montville, Connecticut 06370, Prepared for Daniela Gjergjaj, April 10, 2025.

The following comments and/or questions are based on a review of the above referenced documents and observations identified on the May 5, 2025, site walk:

1. I have reviewed the wetland boundary in the field as identified and flagged by Soil Scientist, Mr. Robert Russo, and I am in general agreement with the regulated boundaries as depicted on the subject site plans. With exception, at the site's entrance the wetland system extends to the north over the property line and is more extensive in the field than what is represented on the subject site plan. The applicant should provide additional clarification on the extents of the wetland boundary at this crossing point and confirm the grading impacts to the wetlands at Crossing site #1 are limited to 1,970 SF of disturbance. Although the wetland boundary is readily identifiable to most professionals, 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 at the crossing sites and the developments leading edge, so the closest wetland boundaries to the development are clearly marked in the field.
2. The wetland application notes that two crossing points and associated drainage from construction of the shared driveway will result in permanently fill of 4,950 Square feet of wetlands. Understanding the application states that no loss of wetland function will result from the construction of the shared driveway crossing(s), the applicant should evaluate and provide mitigation opportunities to offset the physical loss of wetlands. Wetland mitigation options could potentially include wetland creation, enhancement buffer plantings, concentrated plantings at downstream outlets to improve water quality functions, conservation easements or a combination of options.
3. The proposed future emergency access roadway extension into Waterford appears to involve additional wetland impact that was not accounted for. Please confirm if there will be additional wetland impacts at the terminus of the access. If there are unaccounted impacts, please update the plans accordingly and revise the subject wetland report to also include analysis of this wetland crossing location. From the site walk this appears to be an area of past disturbance and a historic crossing point of the brook that feeds into the pond. The proposed roadway alignment does not match the proposed grading, and the grading also eliminates the future water quality basin #5. The applicant should quantify the impacts of this crossing site and provide clarification on the design and constructability of this "emergency access". With these additional impacts accounted for the project should confirm the total project SF of wetland disturbance.
4. The Town of Montville Road Standards limit common driveways to service a maximum of five lots. With regards to feasible and prudent alternatives and minimizing disturbances, the applicant should clarify information regarding the

future emergency access and confirm inclusion of this element will not create a zoning non-conformity or compliance issue.

5. Please confirm the overall project site proposed area of disturbance. The Development notes on the Site Plans list the total site disturbance is 5.9 acres. The Inland wetland application form and Statewide Inland Wetlands & Watercourses Activity Reporting Forms indicate that the proposed area of disturbance is less than 5 acres. If the project does disturb greater than 5 acres, please confirm if the Project will be required to register for the CTDEEP Construction Stormwater General Permit.
6. Additionally, with regards to State permits and applicable consultations the Wetland Report states the site is known to host state listed species per review of CTDEEP NDDDB but provides no additional details other than a brief discussion on how the project will have no conflicts with State listed Bat species. The applicant should confirm if formal consultation with CTDEEP NDDDB will be required. If the applicant has completed official NDDDB consultation with CTDEEP can the applicant confirm if there are any State listed wetland dependent species? Are there any plant or invertebrate species intolerant of changes to sedimentation or pollutants, and if required, will the Project adhere to CTDEEP NDDDB Best Management Practices received in a NDDDB determination.
7. The applicant should install a double row of sediment barrier where construction activity is located within 50 feet of any wetland.

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 construction of the shared driveway will require at a minimum (to be confirmed) filling of 4,950 SF of forested wetland habitat is a significant activity. The project proposes standard water quality treatment which can be improved based on the additional recommendations of Boundaries LLC and the Town. These additions should be considered to help mitigate a major effect or negative impact to the overall wetland resources and environment.

While the proposed activity is significant in the fact it will result in the permanent filling of a wetland with the inclusion of additional mitigation and compliance with applicable permit conditions and BMPs it likely will not have a major effect or negative impact.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Ian T. Cole".

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

**WETLAND REVIEW SITE PHOTOS**

**IAN COLE, LLC**

**MAY 5, 2025**

**4 LOT SUBDIVISION**

**27 SILVER FALLS ROAD**

**MONTVILLE**



Photo 1: Noted wetland area upgrade of wetland crossing point #1 near the site's entrance, this is the wetland area that extends over the northern property line.



Photo 2: General wetland conditions at crossing point #1.



Photo 3: General wetland conditions at wetland crossing point #2, Note lack of stream development and lack of strong wetland vegetation, the crossing is at the upper reaches of the wetland system and as such is on the drier side of the wetland spectrum.



Photo 4: General conditions of the pond along the property line / outflow to Latimer Brook.



Photo 5: Watercourse that will need to be crossed to access the 168 acre parcel in Waterford.



Photo 6: Wetlands in the rear of the site along the far eastern side of the parcel.



Photo 6: General upland conditions slated to host the home sites.