

MEMORANDUM FOR THE RECORD
APPLICATION# 25 IWC 7
REGULAR MEETING – THURSDAY, MAY 15, 2025

Prepared by Stacy Radford, Zoning & Wetlands Officer

Owner/Applicant: Daniela Gjergjaj
Address: Silver Falls Road, (001-007-00A), Oakdale
Date of Receipt: April 9, 2025
Date Received by IWC: April 17, 2025 (*DRD – June 21, 2025*)

Applicant Request: Regulated activities within the wetlands and upland review area in conjunction with a 4-lot subdivision with the construction of a shared driveway and necessary grading.

Activity Description:

Wetland Disturbance Area	4,590 sq ft
Watercourse/Waterbody Disturbance Area	0 LF
Upland Review Disturbance Area	32,155 sq ft
Deposition of Material	110 cubic yards
Removal of Material	20 cubic yards

STAFF TECHNICAL REVIEW COMMENTS:

1. Project Narrative is required and should include:
 - a. Please explain exactly what is being proposed in the wetlands and within the upland review area.
 - b. Please explain the exact location of the proposed 15” culvert. Are there one, two or three culverts; or is one a gate?
 - c. Please explain the exact location of the proposed 70’ x 45’ basin.
 - d. Please explain the proposed wetlands disturbance shown on Plan of 1,970 sq ft. What exactly is included in this disturbance?
 - e. Please explain the proposed wetlands disturbance shown on Plan of 2,460 sq ft. What exactly is included in this disturbance?
 - f. Please explain the proposed wetlands disturbance shown on Plan of 160 sq ft. What exactly is included in this disturbance?
2. Soil Scientist Report / Narrative:
 - a. Please correct the Zoning District from R-60 to R-80.
 - b. Please correct the road from “Sliver Spring Rd” to Silver Falls Road.
3. Site Plan:
 - a. Sheet 3 – Site Plan Lots 1 & 2
 - i. Please remove the grading shown on Plan within the Town of Waterford.

STAFF COMMENTS:

- This Application is for regulated activities within the wetlands and upland review area in conjunction with a 4-lot resubdivision with the construction of a shared driveway and necessary grading, septic systems, wells, rain gardens and a stormwater treatment basin.
- The Applicant is also proposing a “future emergency access” roadway with an Easement in favor of Golden Trails LLC to access their property in the Town of Waterford.

- The property is located on 19.51 acres in the R-80 zoning district with approximately 259.85 feet of frontage onto Silver Falls Road. The property abuts the Town of Waterford and is currently undeveloped.
- The Applicant is proposing approximately 4,590 square feet of disturbance within the wetlands to construct and grade a common driveway, construct a 15” culvert beneath the driveway to promote connectivity in the wetland on both sides of the driveway, construct a 70’ x 45’ stormwater quality basin within the URA to manage runoff from the driveway, and the implementation of E&S controls in and around the project area including the installation of silt fence, grassed swale, an anti-tracking pad, and hay bale barrier.
- The Applicant is proposing to conduct the above work utilizing the typical excavators, loaders, rollers, and dump trucks.
- All of my Technical Review Comments listed above have been addressed.

AGENCY COMMENTS:

- Town of Waterford – Application was referred on April 11, 2025. Comments were received on April 25, 2025 and forwarded to the Applicant. A copy of the comments are attached to this Staff Report and listed as Exhibit 6 on the Exhibit List of this Public Hearing file.
- Town Soil Scientist (Ian Cole) – The referral for comments was forwarded on April 11, 2025. Comments were received on May 6, 2025 and forwarded to the Applicant. A copy of the comments are attached to this Staff Report and listed as Exhibit 9 on the Exhibit List of this Public Hearing file. On May 8, 2025 the Applicant responded to the May 6, 2025 comments and this response was forwarded back to Ian Cole for further comments. No comments have been received to date.

STAFF RECOMMENDATION:

Staff recommends the IWC continue this Public Hearing and set a date for a site walk (if desired), as the Public Hearing does not need to close until June 21, 2025, which is after the next regularly scheduled meeting of June 12, 2025.

****Public Hearing to be continued and conduct a Site Walk****

MOTION “A” – (Continue & set Site Walk)

I make a Motion to Continue the Public Hearing to the next regularly scheduled meeting of June 12, 2025 and set a Site Walk for Application #25 IWC 7 – Silver Falls Road (Parcel ID: 001-007-00A), Oakdale, CT – Applicant//Owner: Daniela Giergaj for regulated activities within wetlands and upland review areas associated with a 4-lot resubdivision, on _____ at _____.

****Public Hearing to be continued, if the Commission chooses NOT to conduct a Site Walk****

MOTION “B” – (Continue the Public Hearing, NO SITE WALK)

I make a Motion to Continue the Public Hearing for Application #25 IWC 7 – Silver Falls Road (Parcel ID: 001-007-00A), Oakdale, CT – Applicant//Owner: Daniela Giergaj for regulated activities within wetlands and upland review areas associated with a 4-lot resubdivision, until the next regularly scheduled meeting of June 12, 2025.



PLANNING & DEVELOPMENT

Date: April 25, 2025
To: Meredith Badalucca, Asst. Planner
Office of Land Use & Development, Town of Montville, CT
Re: 25 IWC 7 – Inland Wetlands Application
4 lot Resubdivision Silver Falls Road: Plan Date 4/10/2025
Referral to Waterford Conservation Commission

Ms. Badalucca,

The Waterford Conservation Commission reviewed the referenced subdivision plan at their meeting conducted April 24, 2025. The following comments are offered for consideration.

1. The proposed future emergency access roadway extension into Waterford will require an application for an inland wetlands permit to the Waterford Conservation Commission. Based on the schematic outline for a 20 ft. wide driveway, the associated proposed grading, and location of off-site wetlands as indicated on the plan, extension of this proposed access onto the Pember Road parcel may involve significant wetland impacts. The location of this access drive extension may need to be modified to reduce the extent of wetlands impacted and to address feasible alternatives as part of the Waterford Inland Wetlands & Watercourses permitting process.


At this time, the Commission has not received or reviewed an application for permit to conduct regulated activity associated with development on the adjacent Pember Road parcel. The purpose of this roadway extension into Waterford remains a question that will be reviewed formally through the inland wetland & watercourses application review process.

2. The limits of grading and fill on Sheet 3 extend west of the limits of the proposed easement for the emergency access road, involving additional inland wetland impact west of wetland flag #1-1. From a review of available aerial photography and elevation mapping (CT ECO), this wetland is a watercourse connecting to the pond. Impacts to this wetland are not addressed in the application or wetland narrative.

3. The proposed layout for the emergency access road does not match the proposed grading in the southwest corner of the parcel. The grading also eliminates the future water quality basin #5 designed to treat stormwater run-off from a portion of the access road. The applicant should provide additional information to clarify these discrepancies.

4. Erosion and sediment control measures are required at the limit of grading and disturbance proposed at the southwest terminus of the emergency access road to mitigate sediment impacts to the down-gradient wetland areas. Temporary construction run-off controls may be necessary in this area due to the associated cut and fill up-gradient of inland wetlands and watercourses.

Respectfully,


Maureen FitzGerald, Environmental Planner
Town of Waterford, CT



Ian Cole, LLC

Professional Registered Soil Scientist / Professional Wetland Scientist

PO BOX 619

Middletown, CT 06457

itcole@gmail.com

860-514-5642

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 NDDB 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 NDDB will be required. If the applicant has completed official NDDB 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 NDDB Best Management Practices received in a NDDB 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 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.

CLA Engineers, Inc.

Civil • Structural • Survey

317 MAIN STREET

NORWICH, CT 06360

(860) 886-1966

(860) 886-9165 FAX

May 8, 2025

Meredith Badalucca, Assistant Planner
Stacy Radford, Zoning & Wetlands Officer
Town of Montville
Department of Land Use & Development
310 Norwich-New London Turnpike
Uncasville, CT 06382

RE: Land Use Application -25SUB3
(001-007-00A) Silver Falls Road
Montville, CT
CLA-7885



Meredith/Stacy,

Attached are responses to all comments received for the above referenced project. Please contact me with any questions.

ENGINEERING COMMENTS

General

- Please update the references to the property zoning designation in the Soil Scientist Report/Narrative (R60 vs. R80).

Corrected

- Please provide a soil erosion control and site restoration bond estimate.

Attached Bond Estimate

Stormwater Modeling

- Please evaluate the contributing watersheds of all proposed driveway culverts to confirm the pipes have adequate capacity for the appropriate design storm.

Drainage Calculations updated

- Please evaluate the contributing watersheds of the proposed grassed swales and corresponding flow velocities for the design flow to ensure that the surface treatment will not be susceptible to erosion.

Drainage Calculations updated

- Please evaluate the 100-year discharge velocities to ensure that the appropriately sized riprap is specified.

Drainage Calculations updated

Resubdivision Plans

- Please confirm the proposed area of disturbance. The Development notes on Sheet 2 state the area of 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 evaluate if registration for the CT DEEP Construction Stormwater General Permit is required.

Disturbance area revised to be less than 5 acres.

- *Please evaluate the available sight line from the proposed shared driveway to confirm the driveway meets the requirements of the Town of Montville Road Standards 130B.8. Sightline demonstration provided on sheet 7.*
- *Please label the 100-year flood zone and provide a cuts and fills evaluation for proposed earthwork in the flood plain. Provide compensatory storage if necessary. Comparison of existing and proposed grades within the 100 year floodplain indicate a net cut of 340 CY and therefore compensatory storage is not needed.*
- *Please evaluate proposed grading for the driveway around Station 1+00. It appears there may be a proposed cut within the limits of the delineated wetland. Please consider if a groundwater control drain would be advisable to protect the driveway surface. Underdrain provided.*
- *Please show and call out the proposed scour protection at the driveway culverts. Provided.*
- *Please confirm which swales are proposed be grassed and which are rip rap. The callouts point to the same swales. Corrected.*
- *Please add a sediment forebay to Water Quality Basin 1 given the proximity of the discharge to the wetland limit. Forebay Added.*
- *Please incorporate a double row of sediment barrier where construction activity is located within 50-feet of the limit of inland wetlands per Section 5(b)(2)(A)(ii) of the DEEP Construction General Permit. Added.*
- *Please include sizing and scour protection for the identified future culvert. Provided.*
- *Town of Montville Road Standards limit common driveways to five lots. Please provide additional information regarding the future emergency access and confirm that this will not exceed five lots being served from the shared driveway or request a waiver of the requirement from the Department of Public Works if applicable. The road in question is for emergency access only and serves a single lot in another Town and jurisdiction.*
- *Please review the proposed grading along the southwesterly corner of the property. There appears to be conflicting proposed grades. Grades corrected.*
- *Please locate the proposed stormwater galleries on Lot 1 outside of the 75-foot well radius. Revised.*
- *Please update the proposed driveway callout along the southerly property line near the Lot 1 septic system. Revised.*
- *Please incorporate a drainage easement for the stormwater discharge from Lot 2 onto Lot 1. Provided.*
- *Please indicate proposed driveway widths on the plans. Provided.*

- *Please update the Typical Driveway Section Detail to comply with the Town of Montville Road Standards for common driveways.*
Revised.
- *Please update the Driveway Detail to comply with the width specified in the Town of Montville Road Standards for common driveways.*
Revised. Note that a copy of waiver request letter is attached related to pavement limits.
- *Please coordinate the overflow berm height called in the Typical Rain Garden Details with the heights called for on the plans.*
Revised.
- *Please provide details and dimensions for the proposed grassed lined swales and/or rip rap swales and any erosion protection measures required based on design flow velocity.*
Provided.
- *Please consider updating all references to CT DOT standard specifications to Form 819.*
Updated.

ZONING & WETLANDS OFFICER COMMENTS:

1. *Project Narrative is required and should include:*
 - a. *Please explain exactly what is being proposed in the wetlands and within the upland review area.*
Narrative attached
 - b. *Please explain the exact location of the proposed 15" culvert. Are there one, two or three culverts; or is one a gate?*
Narrative attached
 - c. *Please explain the exact location of the proposed 70' x 45' basin*
Narrative attached
 - d. *Please explain the proposed wetlands disturbance shown on Plan of 1,970 sq ft. What exactly is included in this disturbance?*
Narrative attached
 - e. *Please explain the proposed wetlands disturbance shown on Plan of 2,460 sq ft. What exactly is included in this disturbance?*
Narrative attached
 - f. *Please explain the proposed wetlands disturbance shown on Plan of 160 sq ft. What exactly is included in this disturbance?*
Narrative attached
2. *Soil Scientist Report / Narrative:*
 - a. *Please correct the Zoning District from R-60 to R-80.*
Corrected
 - b. *Please correct the road from "Sliver Spring Rd" to Silver Falls Road.*
Corrected
3. *Site Plan:*
 - a. *Sheet 3 – Site Plan Lots 1 & 2*
 - i. *Please remove the grading shown on Plan within the Town of Waterford.*
Corrected

ASSISTANT PLANNER COMMENTS:

Application:

1. *Application indicates that CT General Stormwater Quality Permit is not required. However, plan indicates approximately 5.9 acres of disturbance on Sheet 2, Note 1. The drainage report indicates approximately 4.4 acres disturbed within watershed #1 and approximately 1 acre in watershed #2. Please clarify acreage of disturbance and requirement of CT General Stormwater Quality Permit.*
Disturbance area revised to be less than 5 acres.
2. *Please provide a copy of the NDDDB determination letter.*
A copy of the NDDDB determination letter is attached to this letter. Notes for protection of the species indicated in the letter have been added to the plans.
3. *The drainage report indicates riprap swales and the plan indicates grass lined swale and riprap swale, please clarify.*
Corrected
4. *Please provide a legal description of each proposed lot for review by staff.*
We request that this be provided as a condition of approval.
5. *Please provide easement documents for review and approval by the Town Attorney.*
We request that this be provided as a condition of approval.
6. *Please provide a shared driveway agreement for review and approval by the Town Attorney.*
We request that this be provided as a condition of approval.

Site Plan:

Sheet 1:

7. *Per SR (Subdivision Regulation Section) 4.3.1, please provide the acreage of the property to be subdivided.*
Provided

Sheet 2:

8. *Per SR 4.3.5, please indicate the lot numbers and street numbers as approved by the Town Assessor.*
Provided
9. *Please indicate the square footage of Proposed Lot 1 on the zoning compliance table.*

Provided

10. *Plan shows easement in favor of Golden Trails LLC in green (shared driveway), blue (emergency access) and purple. Please clarify.*

Clarified

11. *Note #3 indicates 125-foot inland wetland upland review area. Please update for 50-foot.*

Revised

Sheet 3:

12. *Please revise plan to remove grading from Waterford parcel.*

Corrected

13. *Please label the 100 year flood zone.*

Provided

14. *Please clarify if the swale along the drive way is grass lined or riprap.*

Provided

15. *Please label the pipe across the emergency access.*

Provided

16. *Please indicate if the emergency access will be gated to prevent non-emergency use. Also, is there a Knox box proposed for use by emergency personnel?*

Provided

17. *Arrows indicating location of silt fence do not point to silt fence.*

Corrected

18. *Please indicate size of emergency vehicle turnaround.*

Provided

19. *Per town road standards, shared driveways must be a minimum of 15'.*

Please revise plan

Corrected

20. *Per town road standards, shared driveways can only serve 5 lots. Please indicate on plan that the emergency access will not serve more than one lot in Waterford.*

The road in question is for emergency access only and serves a single lot in another Town and jurisdiction.

21. *Note on plan pointing to Lot 1 side yard setback states "proposed driveway 10.5% max slope" please revise.*

Revised

Sheet 4:

22. *Arrows indicating location of silt fence do not point to silt fence.*

Corrected

23. *Please label 50' Upland Review*

Provided

Sheet 8:

24. *General Note #9 states 100-foot regulated area. Please revise to 50-foot.*

Corrected

25. *Construction Sequence Note #2, please revise to include "Zoning and Wetlands Officer shall inspect prior to any disturbance."*

Corrected

26. *Construction Sequence Note 8, please remove "town staff" and replace with "Zoning and Wetlands Officer".*

Corrected

Overall Plan:

27. *Per SR 4.3.11, are there any proposed property line monuments or markers?*

Provided

28. *Per SR 4.6.6, show location of well and septic on adjacent lots if information is available from public records. If not available from public records, please provide statement indicating such.*

Note provided on sheet 3 & 4

SOIL SCIENTIST COMMENTS

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.*

The plans show the entire extent of the impact within the property boundaries. CLA requests that the reflagging of the wetland and surveyors stake out prior to construction be a condition should the commission choose to approve the application.

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.

CLA has added buffer plantings (see sheet 3) to enhance the local habitat value.

- 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.*

The road in question is for emergency access only and serves a single lot in another Town and jurisdiction. The plans show all the impacts proposed within the Town of Montville.

- 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.*

The road in question is for emergency access only and serves a single lot in another Town and jurisdiction.

- 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.*

The area has been revised to less than 5 acres.

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 NDDB 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 NDDB will be required. If the applicant has completed official NDDB 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 NDDB Best Management Practices received in a NDDB determination.*

The determination letter from CTDEEP NDDB is attached and CLA has included plan notes governing construction season and measures to exclude protected species from the work zone.

7. *The applicant should install a double row of sediment barrier where construction activity is located within 50 feet of any wetland.*
Provided

OTHER:

Assessor Comments: Addresses added to plan
Police Department Comments: Note revised

Please contact us with any questions.

Sincerely,



Robert A. DeLuca, P.E.

c: D. Gjergaj