




---

***Ian Cole, LLC***

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

***PO BOX 619***

***Middletown, CT 06457***

***[Itcole@gmail.com](mailto:Itcole@gmail.com)***

***860-514-5642***

May 24, 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 a review of the updated CLA site plan and additional information provided by CLA and the Applicant on May 8, 2025, and I offer the following additional comments for the Town of Montville Inland Wetland Commission consideration.

To offset the permanent filling of 4,950 SF of wetlands to facilitate the proposed shared driveway connection the applicant is proposing to plant 19 Highbush blueberry and 18 Common winterberry shrubs in 1-gallon containers. No other mitigation details were provided. 1 gallon- containers are inadequate to offset the proposed impact. The size of the plantings should be minimally 3-4' landscape quality shrubs to ensure survivability and vigor. To provide a well-functioning self-sustaining buffer. The applicant should provide additional planting details that minimally include location of plantings, ground and soil preparation, as well as what performance metrics will be included to ensure the planted area is established and shrubs survive past the vulnerable post planting stage. The wetland restoration plan should include post-construction monitoring, reporting and

should address measures that ensure invasive species are not introduced or propagate within the mitigation plantings.

The applicant has updated the plans to correct the proposed future emergency access roadway extension into Waterford. The proposed emergency access appears to have additional wetland impacts in the abutting town of Waterford that have not been accounted for under a single and complete project. As a single and complete project crossing a town boundary does not alleviate the project from including these impacts, even if the impacts cross a town boundary, a project cannot phase total impacts. While the unaccounted impacts might not have to be mitigated for in the Town of Montville, they should be included in the total project disturbance. The applicant should quantify the impacts of this crossing site and provide clarification on the regulatory permitting of this "emergency access". With these additional impacts accounted for the project should confirm the total project SF of wetland disturbance. If the applicant is proposing more than 5,000 SF of wetland disturbance additional State and Federal wetland permits may be required.

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,



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