



Ian Cole, LLC

Professional Registered Soil Scientist / Professional Wetland Scientist

PO BOX 619

Middletown, CT 06457

Itcole@gmail.com

860-514-5642

July 12, 2025

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

**Re: 25 IWC11 – 375 MAPLE AVE
 TRAILER STORAGE FACILITY**

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a site visit last year on January 3, 2024, for the previous 2024 Trailer Storage Facility application that was withdrawn, and I have reviewed the current June 2025 revised site plans and updated wetland application materials to construct a new trailer storage facility by the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 relating to assessing the significance of impacts to the regulated areas.

The following June 2025 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, Dated 6-2-2025
- Town of Montville Inland Wetlands and Watercourse Regulations (October 19, 2017)

- Staff Comments 6-12-2025
- Revised Application 6-20-2025

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

In concept, the proposed June 2025 Trailer Storage Facility is substantially similar to the 2024 application with the notable difference in how the relocating of the man-made watercourse that is discharged from Sharp Hill will be redirected through the proposed development. The previous application proposed to pipe the drainage around the development, and the revised 2025 application now takes a more direct linear route under the middle of the site. The applicant has incorporated all previous environmental and wetland related comments and includes all previously requested Best Management Practices (BMPs) including requested plantings & vegetation management to protect the wetland resources both during construction and long-term.

As with the previous application, the 2025 submittal is a significant activity on the bases of the Town of Montville's definition of a "Significant Activity" in that the relocation of the Sharp Hill Drainage will require filling 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. It should be acknowledged that 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.

It is my opinion that the applicant has provided satisfactory information for the commission to make both a determination of significance and has the necessary wetland related information to make a ruling on the application.

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. I would suggest to the commission that the USACE JD process is a separate regulatory process and should not delay the local permit approval process. If the commission approves the application to allow the project to move forward with a Planning and Zoning application the Project will still need to secure all applicable state and federal regulatory approvals prior to Construction.

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 the proposed 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