



April 17, 2024

Ms. Lynette Wacker
Assistant Town Planner/Wetlands Agent
Old Saybrook Town Hall
302 Main Street
Old Saybrook, CT 06475

Re: BluSky
35 Research Parkway
Inland Wetlands Application
Engineering Review
NLJ # 0232-0042

Dear Ms. Wacker:

As requested, we have reviewed the following information for the subject project:

- Item 1: Town of Old Saybrook Inland Wetlands & Watercourses Commission "Application to Conduct Regulated Activity", dated March 8, 2024, including a list of "Adjacent Properties", "Signature Certificate" and "Wetlands Application Additional Sheets" for responses to application questions #6 and #11, prepared by BluSky.
- Item 2: Document titled "BluSky Wetlands Commission, 35 Research Parkway Proposal", no date, prepared by BluSky.
- Item 3: Set of four sketches including a "Process Flow Diagram" and untitled sketches including cooling tower plan and elevation views and a section drawing of the cooling water tanks.
- Item 4: Drawing titled "Improvement Location Survey, Property of Stark Properties, LLC, 175-5 Elm Street, Elm Street Industrial Park, Old Saybrook, Connecticut", dated March 8, 2024, prepared by Angus McDonald Gary Sharpe & Associates, Inc.

In addition to reviewing the above noted items, I have also made a site inspection and met with the owners of BluSky to discuss the application.

The subject property includes an existing industrial building, paved parking areas, paved access drives, and a storm drainage system that discharges to an adjacent inland wetland area. The business owners are proposing to utilize the existing building for use as a carbon dioxide removal company through processing of existing organic waste products. With the exception of relocating an existing above ground propane tank and adding a second tank within an existing cleared area approximately 75-feet from an inland wetland area, the other proposed exterior improvements include cooling towers and associated water storage tanks (approximately 70-feet from an inland wetland area), and an exhaust cleaning room (approximately 45-feet from an inland wetland area), both of which will be located within existing developed areas. In this

Nathan L. Jacobson & Associates, Inc.
Nathan L. Jacobson & Associates, P.C. (NY)
86 Main Street P.O. Box 337 Chester, Connecticut 06412-0337
Tel 860.526.9591 Fax 860.526.5416

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regard the cooling towers and associated water storage tanks will be located within an existing paved area, and the exhaust cleaning room will be constructed on an existing concrete loading dock. Given the limited scope of exterior improvements, along with their locations within existing developed areas, there would not appear to be any significant impact to the adjacent inland wetlands.

We have the following comments:

1. While an alternatives analysis as required in Section 7.5F of the Inland Wetlands and Watercourses Regulations has not been submitted, given the configuration of the existing building and access drive within the property, and the location of the proposed exterior improvements within already developed impervious areas, there would not appear to be any apparent alternatives that would reduce impacts within the 100-foot regulated area.
2. As required in Section 7.5K in the Inland Wetlands & Watercourses Regulations, a completed CTDEEP reporting form should be submitted for the Commission's review.
3. Based on my meeting with the owners of BluSky, it is my understanding that revised drawings are being prepared to extend the existing silt fence in a westerly direction along the edge of existing pavement to a point located to the south and west of the existing loading dock where the exhaust cleansing room is proposed, and to relocate the proposed haybales to the south of the cooling towers and water storage tanks in order to facilitate their construction. It is also my understanding that the existing storm drain that is shown running under the proposed cooling towers and water storage tanks will be relocated around them and between the two existing catch basins. The plans showing the above-described revisions should be submitted for the record and serve as the basis for the Commission's decision on this application.
4. In addition to the extension of the silt fence, we would recommend that silt sacks be installed within the two existing catch basins located at the rear of the existing building as well as the existing yard drains located to the south of the loading dock.
5. While not an inland wetland related comment, I have advised the business owners that the subject property is located within an AE Flood Hazard Area with a Base Flood Elevation (BFE) of 9.0 NAVD88. Section 5.3.1 in the Old Saybrook Flood Plain Ordinance requires the lowest floor, including any



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equipment located on exterior pads, to be elevated to the BFE plus two feet, which at this location will result in a Design Flood Elevation (DFE) of 11.0 NAVD88. In this regard, it should be noted that the existing drawing identified as Item 4 above is based on NGVD29 datum with the conversion from this datum to NAVD88 datum being approximately minus 1-foot. As such, the existing loading dock would be at elevation 9.1 NAVD88, which would require the exhaust cleansing room equipment to be elevated 1.9-feet above the existing loading dock elevation. Similarly, the existing ground surface at the location of the cooling towers would be at elevation 9.71 NAVD88, which would require cooling tower equipment to be elevated 1.29-feet above the existing ground elevation. In both cases, the business owners indicated that complying with these minimum elevation requirements would not create any issues, and that they would comply with this requirement.

Should you have any questions, please feel free to contact me.

Sincerely,
Nathan L. Jacobson & Associates, Inc.

Geoffrey L. Jacobson, P.E.

Cc: C. Fortuna
C. Costa
BluSky
Angus McDonald Gary Sharpe & Associates, Inc.