

To: Mr. John Moulson, Chair
Inland Wetlands and Watercourses Commission, Town of Preston
Preston Town Hall, 389 Route 2
Preston, CT 06365

From: Margaret Gibson, 154 Watson Road, Preston, CT 06365

Date: December 21, 2021

Dear John Moulson and members of the Inland Wetlands and Watercourses Commission,

I have been requested by members of my family not to attend the Public Hearing scheduled by Preston IWWC for this evening at 8 p.m. at the Preston Plains School because of the closeness of the holidays, the spreading presence of Covid, and the age and fragility of some of my family with whom I hope to spend Christmas celebrations within days of the Public Hearing. I ask that this letter be considered part of the Public Hearing and distributed to all IWWC members and posted on the IWWC website.

Being of sound mind *and* body, at least currently, I am writing to voice my opposition to the Application of Blue Camp CT LLC to the Preston IWWC dated October 11, 2021. I have read this application, the assessment by REMA, and other documents and letters posted on your website regarding this application, and I conclude that, while there has been attention to sensitive issues regarding this development about water and sewage use and management, **the application should be rejected OR substantially restricted and amended per your suggestions and requirements.**

Let me also add that while I am a member of Preston's Conservation Commission, I am writing as an individual and Preston resident and not as a member of that only advisory Commission. My access to the letter provided by the Conservation Commission to IWWC has been via the IWWC website.

My concerns and recommendations are as follows:

I. DISTURBANCE OF THE WETLANDS

CLA Engineers, INC, noted that wetlands need to be flagged, (and I would add signage posted every 25 feet) and that 15 safari tents currently drain directly into the wetlands area without treatment; the same is true of another 13 safari camps which drain directly into the wetlands. It is disturbing to see the application come in with this kind of inattention to the very area for which the developers are seeking a "special exception." What else have they overlooked? Not only does this error in protecting the wetlands need to be corrected, but everything proposed in this application needs high scrutiny.

The proposed RV facility called “Blue Camp” proposes “direct, temporary” disturbance of certain wetlands, followed by remediation. In my view, the language might be more accurate if we considered it “indirect and ongoing disruption and possible destruction.” The areas of wetland adjacent to the proposed “glam camping” sites along Avery Pond and alongside wetlands will not only be seriously impacted during construction, but the on-going presence of campers April-October of each year will be potentially destructive. Who will regulate where the campers decide to hike or investigate? The campers are on vacation and may feel more entitled than respectful. What oversight will be given? What has Blue Camp’s record been in regulating and monitoring activities once the construction period is over?

Natural systems are fragile and sensitive. While direct and temporary disturbance MAY be limited, ongoing and direct or indirect disruption by humans may, little by little, become destructive.

RECOMMENDATION:

ELIMINATE OR REDUCE THE NUMBER OF GLAM CAMPING SITES.

INCREASE THE DISTANCE BETWEEN HUMAN ENCROACHMENT (Tent sites) AND THE WETLANDS THEMSELVES.

INSIST THAT THERE BE A COMPREHENSIVE MONITORING SYSTEM IN PLACE, ESPECIALLY IN ALL ENVIRONMENTALLY SENSITIVE AREAS.

II. PRIME FARMLAND SOILS

According to the letter sent to the IWWC by the Conservation and Farmland Commission, and according to the map provided, there are prime farmland soils in areas 702A, 29B, 703A, 702A and 12. Blue Camp’s application rather casually refers to these soils (Agawam, Tisbury and Haven silt loam) as potential for cultivation in hay or crops, or idle. As PRIME FARMLAND, however, such soils are valuable economically in a time of farm to table food culture and may, given climate disturbances and crises, be used in the future for growing food locally. **If these soils are built on as proposed by Blue Camp, the prime farmland will be unable to be reclaimed and lost forever.** The use of trailer sites and roads proposed for this property is destructive. While existing zoning permits development, common sense would reject it.

RECOMMENDATION: CONSIDER REDUCING THE NUMBER OF RV SITES ON PRIME FARMLAND ACREAGE. OR: REJECT THE APPLICATION.

III. AVERY POND

Avery Pond is a 36-acre pond, 3 to 9 feet in depth. My much smaller pond at home is about the same depth. The swimming’s not great, and the boating is comical. Boating on shallow water is

much more likely to damage life along the bottom than in deeper ponds. Avery Pond, although larger than my pond, is hardly suited for the number of kayak and canoes that Blue Camp will, using its language, “encourage” its campers to use. The proposal of a boat launch and the presence of canoes and kayaks on Avery Pond, especially given the probable fluctuating and daily population at Blue Camp at its proposed capacity (304 sites) will:

- 1) damage the fragile and already distressed eco-system of Avery Pond,
- 2) discourage or eliminate nesting and visiting birdlife (especially bald eagles)
- 3) potentially disrupt and damage the migratory patterns of alewives in the watershed that includes Amos Lake and Poquetanuck Cove and connecting waterways. These are just a few examples. There are others.

Whatever Blue Camp may claim about treating sewage and run-off and returning the treated water to either Avery Pond or to Indiantown Swamp, **treated water is potentially suspect and NOT an acceptable alternative. The better course of action is to restrict or deny development that pollutes water.** It’s hard for humans to leave things alone, not to interfere; we’re more likely to think we can manage everything ourselves, but we can’t, and we put sensitive systems that include ourselves at risk.

RECOMMENDATION:

Restrict the number of campsites and RV parking spaces.

No boat launch, no kayaks, no canoes.

Substitute passive viewing stations for those who want to gaze at Avery Pond from a distance.

IV. IMPACT ON ESTABLISHED PRESTON NEIGHBORHOODS, LYNN DRIVE in particular.

I encourage the IWWC to listen to the voices raised in by residents in the neighborhoods of **Lynn Drive, Cooktown, and Watson Roads.** These neighborhoods will suffer economically more than will the rest of Preston—although Blue Camp brings no economic advantage to the Town of Preston as a whole and is likely to cost the town revenue in fire and police protection and environmental monitoring.

Houses along Avery Pond come with deeds that allow the use of Avery Pond. It is possible that Blue Camp’s proposed RV park and its revolving population of as many as 1,000 people daily, (even if only a fraction of these visitors are allowed on Avery Pond) will infringe on the deeded rights of Preston residents, in addition to adding stress to the pond’s ecology.

It is certain that the residents of this area will bear the impact of air pollution, water pollution, noise pollution, increased lights, and that they, like the wildlife that seek refuge in the pond, will have their way of life destroyed and property values diminished. Many of these houses are in a flood zone.

RECOMMENDATION:

PLEASE SUPPORT AND DEFEND THE LIVES AND LIVLIHOOD OF PRESTON RESIDENTS. RESTRICT BLUE CAMP, NOT PRESTON RESIDENTS.

- V. According to Blue Camp's application, (see page 17) "The site for the Preston, Connecticut recreational campground (sic) was chosen, in large part, due to its proximity to both the Foxwood Casino and Avery Pond."**

I question the credibility of this statement. While I accept that proximity to Foxwoods Casino is a very large motivation, surely a small, distressed pond such as Avery Pond is a far cry from the "waters" that Blue Camp typically "camps" next to—an ocean, a river. Blue Camp may claim to be "environmentally" observant, but to threaten wetlands, Avery Pond, Indiantown Brook and all the watercourses connected to these is not environmentally acceptable behavior. It is quite fine to propose plantings of indigenous trees and flowers and grasses, but this is window-dressing compared to the possible and on-going other stresses Blue Camp RV will create.

RECOMMENDATIONS:

It would be far better to allow Foxwoods to solve its parking problems with regard to RV campers who wish to go to Foxwoods by providing an internal site ON ITS OWN RESERVATION LANDS, one that does not impact natural water systems, disrupt Preston neighborhoods, threaten wildlife. In addition to the other issues I've raised, we all share the same aquifer, and I question the wisdom of putting additional stress on the water table. Many of the residences in Preston rely on wells.

Any monitoring or checking of environmental conditions, during construction or afterwards, should be performed by a team of experts that the Town of Preston recommends, and NOT by persons hired by Blue Camp. (See #9, page 10, of the Application).

In determining the feasibility and prudence of this application, please bear in mind that should the IWWC request reductions and changes that cause the applicant to respond that, with the modifications, the project is not financially viable, THEN SO BE IT. It is not the job of the Town of Preston to guarantee financial viability for the applicant, but rather to determine the best use of the property within the town for its residents.

IV. The Larger Picture, the Longer View

In the current time of obviously increasing storms, tornadoes, heavy rains, and in other parts of the country droughts and wildfires, it is clear that human use of fossil fuels and carbon emission has interfered with, impacted, and harmed the climate and human beings, who are part of the natural world. To reject or scale back this application will not solve climate change, but we should recognize that Blue Water proposes to increase carbon emissions significantly in our town. We are a small town, but we are part of the larger Earth. Aggressive climate change will not stop until everyone's local decisions are responsible environmentally. **We should act locally to diminish and not to increase pollutions, carbon emissions, water and soil destruction.**

RECOMMENDATION:

Reject or substantially reduce and restrict the Proposed Development of the RV park called "Blue Camp." There's little glamorous about any of it; there's plenty to arouse genuine concern.

On a personal note, I ask the members of the IWWC not to take my occasional boldness of statement (and size of font!) or my passion for creating and sustaining an environment beneficial for all concerned as anger directed toward the IWWC as a whole or toward any of its members, whose work and intelligence I respect. The boldface type is for clarity. Many ideas and reflections of mine are echoed by other Preston residents, and indeed more eloquently. Other Preston residents have much more to say. I encourage you to listen to our voices.

Respectfully yours,

Margaret Gibson