

To: Kathy Warzecha and The Planning and Zoning Commission of the Town of Preston, CT
From: Margaret Gibson, Preston resident
Re: The Proposal made by Blue Water LLC to establish Blue Camp RV Park
Date: January 14, 2022

Dear Kathy and Commissioners:

Thank you in advance for reading and taking into your consideration this letter and the others sent to you by Preston residents as you review the proposal submitted for the Blue Camp RV parking lot on Route 2.

The application proposes parking for 304 RVs and the establishment of 27 "safari tents" for glam-camping, as well as various recreational facilities. As I understand it, occupants would largely be visitors to Foxwoods, both to its gambling and family recreational facilities. At full capacity, there would be between April and October of each year, a regular turn-over of a minimum of 600 to 1,000 people per day at this site which is along Route 2 on the way to Foxwoods, but also near to the busy intersection of Route 2 and Route 164, the location of the Preston Plains School and a heavily trafficked intersection throughout the year. The proposed RV parking lot would be adjacent to a long-established residential neighborhood on Lynn Drive, and near to other neighborhoods on Watson, Cooktown, and other roads whose properties do not abut but which will be affected because of the scale of the proposed usage.

Blue Camp is making its application under a "**Special Exception.**" In Section 18 on Special exceptions, #18-4, I am struck by this assertion: "The Commission . . . may stipulate such restrictions or conditions to protect or promote the rights of individuals, property values and the environment in the area as a whole, the public health, safety, or welfare, sound planning and zoning principles, improved land use, site planning and land development or overall **neighborhood compatibility.**"

Reading through the rest of 18-4, I find ample standards by which the Commission may **reject or substantially modify** the proposal by Blue Water LLC and in doing so be protecting: 1) an established town neighborhood of many years, 2.) Preston Plains School, where in April, May, much of June, September, and October there are school busses and cars using Routes 164 and Route 2, and 3) a body of water, Avery Pond, which connects to Amos Lake, Poquetanuck Pond, and other watercourses and whose own wetlands and pond area provide an environment for a variety of flora and fauna, among them the American Bald Eagle, a bird which, still endangered and making a come-back, is sacred to Native American people and is our national bird. In addition, there will be serious disturbances to traffic and the general quality of life in this town we love.

Please note that in this letter, I use the word environment to include not just the endangered flora and fauna at the site, but also the human community near Avery Pond and by extension the Town of Preston itself, which is a small farming and community network notable for its scenic beauty and its quiet way of life.

I write to ask you to consider the following as you weigh the appropriateness, the "fit" of the proposed development (called Blue Camp) with the Town of Preston.

We are asked to weigh the environmental impact against economic benefits. The question I find pressing is this: WHO DECIDES THE ECONOMIC BENEFIT TO TOWN? The developer? or the Town itself? The answer is obvious to me—the Town of Preston, not the developer, who has its own profits as a motive force.

The proposal offers minimal economic benefit to the Town of Preston and insures substantial hazards.

Concerns have been raised by the State Trooper, by the Preston Plains Superintendent of School, and by many Preston residents who have written to you and to the Inland Wetlands and Watercourses Commission and who are informed by experience and intelligence and research. Their letters (posted on the Town websites) offer more detailed information on the hazards and dangers, and I urge you to take them into consideration.

The proposal would create environmental detriments:

Damage to property values in the adjacent and abutting neighborhoods. Blue Camp is not compatible with these neighborhoods.

Damage to Avery Pond by Blue Camp's proposed dock and its wish to "encourage" kayaking and canoeing on the pond.

The temporary **damage** to wetlands they acknowledge, followed by "restoration" of wetland areas adjacent to the proposed glam-camping tent sites, while dubious, only **allows for** on-going potential damage to the wetlands by the visitors to those camp sites, who have no stake in preserving them. The proposed dock and desire to encourage kayaks on Avery Pond only furthers the long-term damage.

Damage to nesting and feeding bald eagles and other endangered species or species of concern. (Please read the detailed letters from Preston residents on this subject.)

Loss of prime farmland. (33.7 of the 65 acres are in prime farmland). (See the letter from the Conservation and Agricultural Commission, advising against the proposal.) If in some years, Blue Camp fails and closes, the rubble left behind would not let the owner (The Mashantucket Pequot Nation) revert to a more gentle use of the land.

Adverse living conditions for the entire town based on increased traffic flow on roadways already heavily trafficked, particularly at the intersection of 164 and Route 2, at the entry into the proposed RV parking site (which has no emergency exit), Watson and Shewville Roads.

A variety of detrimental effects to way of life, environment (human and otherwise) and health caused by light pollution, noise (ie parties and recreational noise), **increased and concentrated carbon emissions** in the area adjacent to neighborhoods where town residents live and where various species nest and breed.

Environmental and Economic Concerns

Like any town or city in CT, the Town of Preston has the responsibility and the means of safeguarding the community and its environment now and into the future.

It is very possible that the town regulations and guidelines need revision, given the pressures of larger and more frequent storms, changing weather patterns that affect residents, especially those living in flood plains. (Much of the closest affected neighborhood on Lynn Drive is in a flood plain.) It is very possible that the guidelines which have been governing rain, water flow and hundred-year storms are inadequate in a changing local environment affected undeniably by wide-spread climate change. While this proposal has to be weighed against current regulations, it is quite possible that the regulations they comply with will swiftly become inadequate.

The proposal may be viewed as a wake-up call to the need for Preston—and for that matter, other towns and cities in CT—to reevaluate their regulations. It is apparent even now that with climate change, we are heading into a vulnerable future.

It is certain that humans have too long been guided by short term economic benefits and not by an understanding of long-term damages to environment and community. It is timely to begin to reassess our values and to make changes.

As an agricultural town, Preston could be more aware of the shifting climate and the damaged supply chains nationwide that go with it. Prime farmland is an asset, as is the prime attitude that **local sustainability needs to be protected**. When prime farmland is lost to the sort of development proposed by Blue Camp, it is lost forever.

It is certain that the Blue Camp RV proposal is out of line with the Town of Preston's vision of itself as reflected in its Plan of Conservation and Development.

I do not think that there is sufficient economic benefit to the Town of Preston. This proposal should be rejected on those grounds, and on the grounds of neighborhood incompatibility. Planning and Zoning Commission might look ahead to the more tax-beneficial development that will take place on the former State Hospital grounds on Route 2A beside the Thames River. Do we really need the revenue this development might bring with it? Are the damages and detriments worth it?

Important Questions:

IS THERE NOT ANOTHER SITE ON LAND OWNED BY THE MASHANTUCKET NATION WHERE THEY COULD PUT THE RV PARKING LOT AND RECREATIONAL FACILITIES, one that would not impact the Town of Preston as seriously?

If there is—and surely there is—then a special exception should not be granted, according to the Commission's own guidelines.

It is clear that those who will economically benefit the most from this RV lot are 1) Blue Water Development and 2) the Mashantucket Pequot Nation. Blue Water has asserted that its camp sites must be near water, and that Avery Pond (a small, distressed pond, only 8 feet deep and that depth in only certain areas) was largely why they chose the site. Really? Even if so, this is no reason that the proposed development cannot take place on a less environmentally vulnerable, more neighborhood-compatible site that would not impact a local school and traffic. If there is a requirement for a body of water, then perhaps Blue Water is the wrong developer for an RV parking lot at or adjacent to Foxwoods or within the lands governed by the Mashantucket Pequot Nation.

WHO OWNS AVERY POND? No one seems to have answered this question, and the development involving the pond, already a distressed pond (if capable still of sustaining and attracting fish and birds and other wildlife) should not occur until this question is settled.

As has been noted, there is already a state boat launch access to Avery Pond. One boat launch to a small, shallow pond should be sufficient. It is, after all, largely a wildlife pond. Other Preston residents have proposed that a passive recreational approach be taken to the pond, with viewing stations made available, but denying direct access from the RV area onto the pond via a dock or its steep banks.

TIMING OF THE APPLICATION

There are many important questions raised by the proposed development. The application by Blue Water LLC was made just before a holiday period in December, minimizing the likelihood of Preston residents' ability to follow the development proposal and make comments.

Public hearings by the Inland Wetlands and Watercourses Commission and by the Planning and Zoning Commission are now scheduled right in the middle of serious and **widespread Covid outbreaks**, a period in which anyone would think more than twice about gathering in large groups, even if vaccinated, boosted, and masked--this concern applies especially to elderly residents of Preston who have lived here for many years.

The Town of Preston should insist on a delayed time schedule owing to these conditions so that an in-depth discussion may be insured by the Commissions for themselves and for the residents of Preston. The applicant is applying for a special exception. Planning and Zoning should make sure that there is sufficient time and safe gathering conditions for its residents in considering this application, requesting an extension of the time it takes to review the application fully and for Preston residents to respond, due to special circumstances.

Respectfully yours,

Margaret Gibson