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March 11, 2022

Town of Preston
Planning and Zoning Commission
Attention: Mrs. Kathy Warzecha, Director of Planning
389 Route 2
Preston, Connecticut 06365

Dear Kathy:

Enclosed herewith please find materials, hereinafter delineated, for submission into the public hearing record with respect to the pending special exception and site plan applications before the Town of Preston Planning and Zoning Commission for a special exception to utilize the combined properties located at 451, 455 and 495 Norwich-Westerly Road (Route 2) for a vacation resort facility with a subset of a permitted recreation campground pursuant to the provisions of Section 18.11 of the Town of Preston Zoning Regulations. Submitted herewith are the following:

1. The March 9, 2022 revision to a document entitled "Application of Blue Camp CT, LLC ("Applicant") to Town of Preston Inland Wetlands and Watercourses Commission Blue Water Recreational Campground Resort at Avery Pond 451, 455 & 495 Connecticut Route 2 Norwich-Westerly Road, Preston, Connecticut Application Narrative", the original of which was dated October 11, 2021 and submitted into the record of the proceedings before the Town of Preston Planning and Zoning Commission to address requirements to demonstrate environmental compatibility of the project.
2. Two (2) full size and five (5) half size prints of the March 9, 2022 revision of the project site development plan entitled "Blue Water Recreational Campground Resort at Avery Pond 451, 455 & 495 CT Route 2 (Norwich-Westerly Road) Preston, CT Issued For: P&Z Comment Revisions February 11, 2022 Revised March 9, 2022 to Address Public Hearing Comments" which has been prepared both to address comments received during the public hearing process before the Town of Preston Planning and Zoning Commission as well as comments elicited in the public hearing process before the Town of Preston Inland Wetlands and Watercourses Commission. The salient modifications to the site development proposal incorporated into the revised project plans are as follows:

(a) The revised plans eliminates nine (9) proposed safari tent sites which were sited on the northwesterly peninsular of the project site on the northeasterly shore of Avery Pond. This modification,

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as well as others referenced herein, were incorporated into the revised project plans to (i) address comments concerning potential adverse impacts to Avery Pond which were voiced in the public hearing process before the municipal Inland Wetlands and Watercourses Commission as well as to address the ongoing dispute with respect to the interpretation of Section 18.11.3 of the Town of Preston Zoning Regulations. Since the Applicant's project limnologist recommended that the Applicant remove all activity within 50 feet of the high water line of Avery Pond, a decision was made to increase that buffer (non-activity zone) to 100 feet in order to address multiple issues which have arisen in the permitting process, involving the Section 18.11.3 issue, since the majority of recreation campsites lost would, by necessity, be lost in order to attain the recommended 50 foot setback.

(b) Creating a 100 foot undisturbed natural buffer around the entire interface of the project parcel with Avery Pond. The result of the creation of this natural buffer is the elimination of 22 proposed recreation campsites reducing the total number of proposed campsites in the project to 280.

(c) Revising the geometry of the most northerly two directional traffic lane within the project site to create a separating distance of greater than 100 feet from Avery Pond.

(d) Removing the floating dock proposed in Avery Pond.

(e) Removing the elevated walkway providing access from the improved site to the shore of Avery Pond.

(f) Incorporating the creation of 2 new wetland areas in the easterly portion of the site comprising approximately 16,000 square feet, in total, to provide a new suite of habitat within the limits of the project, which will be a wet meadow habitat designed by the project ecologist and project landscape architect.

3. Comment response letter prepared by Benesch addressing the review comments recently submitted from the Southeastern Connecticut Council of Governments.
4. Comment response letter prepared by Benesch to address the review comments of the Town of Preston's engineering consultants, CLA Engineers, Inc.
5. One (1) copy of the revised stormwater management report for the project prepared by Benesch entitled "Stormwater Management Report Blue Water Recreational Campground Facility 451-495 CT Route 2 Preston, CT Prepared For Town of Preston 389 Route 2 Preston, CT 06365 October 12, 2021 Rev. January 2022 Rev. March 2022".
6. Traffic comment response letter prepared by Benesch and an accompanying revised traffic impact study dated February 22, 2022.
7. A report entitled "Analysis of Impacts to Avery Pond from Proposed RV Campground, Preston, Connecticut (TRC Project Number 483637)" prepared by the project limnologist and lake manager,

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Carl D. Nielsen, concluding that the project will not have an adverse impact on the ecology of Avery Pond.

8. The Applicant will be submitting five (5) copies of a report entitled "Neighborhood Impact Study Proposed Development Blue Water Recreational Campground Resort 451, 455 and 495 Norwich Westerly Road, Route 2 Preston, Connecticut Paired Sales Analysis by Russ Appraisal A Division of Russ, LLC by Howard B. Russ, SRPA Manager/Member Russ, LLC". This report was commissioned by the Applicant to evaluate whether or not the development of the proposed Blue Water Recreational Campground Resort at Avery Pond would have an adverse impact on the property values of residential properties located in proximity to the project site. In the Benesch response letter to the Southeastern Connecticut Council of Government comments, you will note that the Applicant disagrees with the conclusions reached by Justin LaFountain as to the applicability of Public Act 21-29 on the continuing need of an Applicant to address impacts to property values in a special permit/special exception application. Notwithstanding our continuing position on that issue, we had, as I had previously represented to you, commissioned the appraisal report by Russ Appraisal which will be submitted into the public hearing record in order to demonstrate compliance with the requirements of Section 18.4 of the Town of Preston Zoning Regulations if those requirements are ever determined to have continuing applicability. The completion of this report has been delayed by a continuing significant medical problem that our appraiser is experiencing. However, we anticipate being in a position to produce the final report shortly.

Should you have any questions concerning the enclosed information, please feel free to contact me. As indicated above, all of the reports and exhibits submitted with this correspondence should be entered into the public hearing record with respect to the proceeding currently pending before the Town of Preston Planning and Zoning Commission.

Very truly yours,


Harry B. Heller

HBH/smr
Enclosures
cc: Ms. Emily Demarco
cc: Mr. William Walter
cc: Mr. James Baeurle
cc: Carl D. Nielsen