

Good evening and thank you once again for your service and the opportunity to speak for the good of Preston.

At the past several meeting I have concluded my remarks with the statement "If you feel you must approve this application, please consider these recommendations". However, in review I've reconsidered;

The applicants REVISION NO. 2: MARCH 9, 2022 reduced the number of sites by 24 bringing the number to 278 sites. Last month we were told that 270 was the breaking point. \$50,000+ is allotted for Landscaping over a ten year period, yet zero expense is reflected for tree trimming, lawn & fertilizer services and residential lawn care. Is the full scope of landscaping to be completed prior to opening or is it to be phased in over a ten-year period? Lakes, sewer , water, again zero expense. While I understand that the septic and water utilities are owned by the property owner is this to suggest Blue Water will not be charged for these services? I would like to know what is included in the \$158,854 of other charges and fees?

Prior to the last public hearing I hadn't realized this project was so fragile that the difference between 302 sites and 270 sites would financially break the deal. So now the proposal is at 278 sites, eight sites within financially breaking the deal. What if their vacancy rate estimates are off or Covid, the price of gas, or anything else tips that scale? Preston will be left with three resort commercial sites totaling a 65 acres containing miles of roadways with 278 pads containing sewer water and electric hookups dotting the landscape.

When the Foxwood parking lot was open to RV's you never saw more than a half a dozen RV's at a time. This appears to be an awful fragile financial proposal. Please keep in mind that many of the RV's that drew up the sales over the pandemic have been sitting in their owners' yard functioning as office space for those working at home and not riding around the countryside vacationing.

How many times have you heard it's our own fault we should've bought the Dawley property when we had the chance well now you have a chance, you have the chance to make a right decision concerning the use of that property. Let the lesson learned be to do our due diligence to require the proper site inspections, environmental assessments, and stormwater assessments to make the right decision this time.

The proposal lacks a secondary emergency entrance placing extreme strain on our emergency personnel, as well as emergency services for all occupants. We all should find the suggestion of an unequipped golf cart transporting patients from remote areas to a waiting ambulance unacceptable.

As much as the applicant's attorney continues to remind you of your responsibility. The applicant has a responsibility as well. Any proposal of this scale should include a comprehensive Wetlands Assessment & Impact analysis. This application has failed to provide a comprehensive survey of mammals, birds, reptiles, amphibians, threatened species and species of special concern. These wetland habitats keep the wetlands alive. The analysis failed to express the extent and nature of the impact to wetland habitats, and opportunities to mitigate adverse wetlands impacts. Also missing is a complete species list of wetlands vegetation necessary to analyze the extent of habitat quality loss. Only a brief list of common plants is given. Exhibit 7 the Wetlands Assessment & Impact analysis report prepared by REMA relied on outdated lake data failing to report the severe condition of Avery Pond. There was no mention

of water clarity, nutrient levels, water temperature, dissolved oxygen or a current invasive species assessment. Causing the need for yet another study Exhibit 73 titled Analysis of Impacts to Avery Pond. Some of the prior concerns were addressed in this document. The report suggest stormwater runoff has been essentially eliminated from the pond however has been diverted to stormwater features that discharge to Indiantown Brook. Indiantown Brook which has been established as a major migratory pathway by DEEP and as described in exhibit 23 . Recommendations have been included to monitor the water quality of Avery Pond for five years with no monitoring recommendation for Indiantown Brook. The report suggests the four infiltration basins and five rain gardens appear to meet requirements for stormwater design set by the state (DEEP 2004). Appear to meet. An impact study is supposed to prove compliance or offer mitigation. The fact is the ability of the proposed rain gardens and detention basin's ability to retain the existing hydrology has not been proven and with each revision these basins have been altered further questioning their functionality. Expert witnesses have suggested a long range 10 – 15 year monitoring and maintenance schedule for detention and rain gardens. The only way to know if detention basins and rain gardens are function properly is to monitor the water quality in Avery Pond and Indiantown Brook. The newest report (Exhibit 73) suggests only a five year monitoring plan for the pond? The pond should be monitored for the existing life of the project. The report goes on to say "The soil and drainage appear adequate, and the proposed stormwater design was found by Joseph Theroux, a Certified Forester and Soil Scientist, to have "no significant impacts to the wetlands due to the construction and operation of the project provided that the proposed E&S measures are correctly implemented, inspected and maintained". Appear adequate. We are reading from an Analysis of Impacts to Avery Pond an independent report in the opinion of Carl Neilsen and TRC not Joseph Theroux. The report makes no mention to the analysis of plow pan soil or tile drainage. I'll repeat the applicant has not provided you with a proper comprehensive Wetlands Assessment & Impact analysis.

Had the applicant done its due diligence three months ago this proposal would have come to you with a setback of 100 feet from the any wetland. So please do not let this new revelation stop you from requiring the due diligence this project deserves. Since the importance has been established insist on the 100 foot setback from all wetland areas including ponds and streams.

Page 24 of the applicants REVISION NO. 2: MARCH 9, 2022 ADDRESS PUBLIC HEARING AND EXPERT WITNESS COMMENTS reads " In addition, concerned project neighbors retained the services of Northeast Aquatic Research to render a report concerning the potential impact of the development of the Blue Water Project on the ecology of Avery Pond. Based upon the concerns raised in the Knoecklein Report, and giving due consideration to the recommendations of the Project Limnologist, Carl D. Nielsen, the Project Plans, as they relate to Avery Pond, have been materially revised as reflected in the March 9, 2022 plan revision and accompanying revised stormwater management report.

It was made very clear at the last IWWC meeting that Dr. Knoecklein CLM and PHd in limnology nor Northeast Aquatic Research, Jean Pillo, CPESC Watershed Conservation Project Manager for ECCD, Thames River Basin Partnership Coordinator, and The Last Green Valley Volunteer Water Quality Monitoring Coordinator or Milan Bull Senior Director of Science and Conservation CT Audubon Society were not in any way retained by concerned project neighbors. Please note, it was explicitly stated in Exhibit 65 by Sue Hotchkiss "Our experts aren't being paid to paint a good picture. They are giving their professional opinions and factual testimony free of charge because they feel it is

important to do so." In Exhibit 61 authored by myself I stated "These professionals spoke out not because they were paid to (they were not) but to share their knowledge where it may make a difference." So, for the applicant to say these professionals were retained by concerned project neighbors is false. Another completely false statement is when the applicant stated, "those consultants have never investigated the Property which is the subject of the permit application and are entirely unfamiliar with its physical attributes". Completely untrue Jean Pillo testified in Exhibit 10 that she conducted mid-summer depth profiles at Avery Pond in 2014 and 2015 and returned in 2020 and 2021 for cyanobacteria observational data and sample collection. In exhibit 23 Jean Pillo, Watershed Conservation Project Manager for ECCD writes In reference to Indiantown Brook. On December 10, 2021, I confirmed that this outlet is an intermittent stream originating at Avery Pond. I followed it from the pond to Route 2 culvert along the western side and noted it continued under Route 2.

Page 25 of the applicants REVISION NO. 2: MARCH 9, 2022 reads "Notwithstanding the qualifications of consultants retained by concerned neighbors, those consultants have never investigated the Property which is the subject of the permit application and are entirely unfamiliar with its physical attributes. These reports constitute nothing more than mere speculation and conjecture."

I would like to bring your attention to the second paragraph of Exhibit 73 an Analysis of Impacts to Avery Pond from Proposed RV Campground, Preston, Connecticut (TRC Project Number 483637), authored by Carl Nielsen, CLM. It reads;

Work was performed by Carl Nielsen, a Certified Lake Manager and qualified limnologist with over 32 years of experience in the assessment and management of lakes and ponds. Mr. Nielsen was supported in his review by TRC engineers and wetland specialists. Mr. Nielsen and TRC staff worked independently to review existing site plans, proposed designs, stormwater designs, and reports from Blue Water's wetland scientists, engineers, and others previously working on the project. Additionally, Mr. Nielsen reviewed concerns expressed by Avery Pond stakeholders and their representatives to ensure that we fully understood the issues being raised before providing our analysis of the potential impacts to the pond.

Given the fact that there is no disclosure of visiting the site or fieldwork conducted as reported in the previous impact analysis. This certainly sounds to me like Carl D. Nielson and TRC studied existing documents and possibly have never investigated the Property which is the subject of the permit application and is entirely unfamiliar with its physical attributes. Therefore, according to the applicant own comments exhibit 73 an Analysis of Impacts to Avery Pond from Proposed RV Campground, Preston, Connecticut (TRC Project Number 483637), authored by Carl Nielsen, CLM. constitutes nothing more than mere speculation and conjecture. It cannot be speculation and conjecture for one and not for the other.

Yet the closing remarks suggest The Preston Inlands and Wetlands Agency should have every confidence in the applicant.

The applicant is asking Preston to give up prime farmland zoned resort commercial for something that is anything but resort like. Come back with a proposal that embraces the natural character of Preston and of the ancestral land proposed to be developed. Propose passive recreational activities, incorporate

the history of the site and wildlife education celebrating the region's heritage. A resort is a place where people go for passive recreation, and a relaxing environment that provides privacy, and experiences. Personally, I do not see these characteristics in this proposal.

Preston is a quiet town because we are not overpopulated. Adding over 1,700 people a day into our small town will choke our natural character, our quietness, and our traffic flow. Certainly, it will change Preston forever.

After months of amended reports, I concede to the many reasons why you should deny this application. Yet another incomplete impact study is the straw that has broken this camel's back. The applicant has convinced me that this is not the best use nor the best suitor for Preston's resort commercial zone. There are too many negative impacts in exchange for \$235,000 in annual taxes and very little potential for a positive economic impact. Please deny this project.

Respectfully submitted

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