



Feb. 11, 2022

Town of Preston Inland  
Wetlands and Watercourses Commission  
389 Route 2  
Preston, CT 06365

Dear Mr. Moulson and Committee members:

Thank you for the opportunity to review the REMA's Wetland Assessment and Impact Analysis for the Recreational Campground Resort at Avery Pond.

REMA's Assessment is very comprehensive in many ways. It provides an excellent overview and analysis of all the wetland and upland features of the site and the impacts of the proposed development.

Most, if not all the plant communities are clearly identified with species present on site.

What is strikingly absent are any compressive lists of other taxa which may be impacted by the proposal. Only passing mention of wildlife observed within the various wetland and upland communities are addressed. This may be due to the relatively short amount of time given necessary to complete the assessment.

Certainly there will be some impact of this proposal on the abundance and diversity of wildlife currently on site. Any proposal of this scale should include a comprehensive survey of associated taxa including mammals, birds, reptiles amphibians, etc. with emphasis on any Species of Special Concern ([https://link.edgepilot.com/s/b6f79f79/Xp4PRXs9c0ul5cX4cKkZ\\_A?u=https://portal.ct.gov/DEEP/Endangered-Species/Endangered-Species](https://link.edgepilot.com/s/b6f79f79/Xp4PRXs9c0ul5cX4cKkZ_A?u=https://portal.ct.gov/DEEP/Endangered-Species/Endangered-Species)).

Also there is no reference to possible State listed species within the area that may be impacted. This is readily available from CT DEEP (<https://link.edgepilot.com/s/45ffbb65/kRINUB6xGkqmerrgzv-pFw?u=https://portal.ct.gov/DEEP/Endangered-Species/Natural-Diversity-Data-Base-Maps>).

These factors should be included in any comprehensive assessment and impact analysis.

As stated above, some of this information currently exists within DEEP, but a complete on-site survey would be an important requirement to identify and mitigate potential impacts on wildlife communities. How can the municipality judge the effects of such a large proposal without all the information?

For instance, recently the State (and partners) have completed a comprehensive, state-wide atlas of both breeding and wintering birds in CT (<https://link.edgepilot.com/s/793625c0/iSz42ObKe0GmPJWDvL6iXA?u=http://www.ctbirdatlas.org/>).

This atlas mapped all species found in the state during both nesting and non-nesting seasons. The state was divided up into 601 blocks, each block approximately 9 square miles. I mention this because the

Avery Pond site is included in block number 88A. Volunteers have systematically surveyed this block for the past two years and have listed both the abundance and diversity of all birds on this site. This is absolutely critical information necessary to address potential impacts to the avifauna currently existing on site.

Although the data collected is currently under analysis and has not been yet published, inquiries may be directed to the following:

Connecticut Bird Atlas  
c/o Chris Elphick  
Department of Ecology & Evolutionary Biology  
University of Connecticut  
75 North Eagleville Road, Unit 3043  
Storrs, CT 06269-3043

Connecticut Bird Atlas  
c/o Min Huang  
Connecticut Department of Energy and Environmental Protection  
391 Route 32  
N. Franklin, CT 06254  
[Min.huang@ct.gov](mailto:Min.huang@ct.gov)

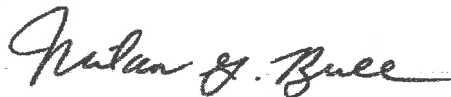
These folks may be helpful in filling in some of the missing data, at least from the ornithological taxa.

In my opinion a sound decision based on proper research and investigation cannot be made based upon the applicant's report.

I would hope that any decision on this proposal would be based on information more comprehensive in scope, and include assessment and analysis of all the wildlife communities that may be impacted.

Thank you.

Sincerely,



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