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To: Town of Preston Planning and Zoning Commission

March 22, 2022

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

RE: Application of Blue Camp CT LLC

We have heard the Applicant in many public hearings argue that “neighborhood compatibility” is not an issue to weigh as you evaluate the proposed Blue Camp Application. I say that “neighborhood compatibility” is indeed an appropriate measure and a vital aspect of determining whether any proposed development should be allowed.

At first, “neighborhood compatibility” was dismissed as inappropriate, with the Applicant citing Public Act 21-29. However, Justin La Fontaine (AICP, CZEO, Planner II) in a letter to Kathy Warzecha, March 2, disagreed with the Applicant’s interpretation of 21-29, believing the Applicant’s interpretation was not accurate with respect to the property values in the neighborhood adjacent to the proposed campground/parking lot.

I bring up this disagreement in interpretation to make this point: The Attorney for Blue Camp represents Blue Camp, of course. Justin LaFontaine had no “skin in the game,” so to speak, as he made his review. When there are differences of legal interpretation, on this or any other point made in these hearings, the matter should be settled in an impartial setting—consulting impartial legal experts or coming to a decision in the courts, if necessary.

Benesh, working for the Applicant, has said that the disagreement between the two legal interpretations is “academic” because of the Neighborhood Impact Report lately submitted by Howard Russ, a real estate appraiser who found there would be no adverse impact on real estate values in the Lynn Drive neighborhood should Blue Camp be approved.

I would like to make this point clearly: Adverse impact on property values is only one aspect of “neighborhood compatibility.” Money is an issue, but not the only one.

In his *Neighborhood Impact Report*, Mr. Russ writes as follows (page four, #10.1) in reference to Preston Zoning Section 10 concerning the Resort Commercial District. *The purpose of the district is to promote tourism-oriented commercial development which may also contain activities that will serve a wide range of needs for area residents. It is intended that such development be located and designed to enhance qualities of the site AND THE TOWN.* (emphasis added).

In reviewing the Applicant’s plan, I ask you to consider if there are “activities that will serve a wide range of needs for area residents?” Is the development **LOCATED AND DESIGNED TO ENHANCE QUALITIES OF THE SITE AND THE TOWN?**

Since this Application has been submitted, months ago, there have been numerous revisions and adjustments, because the application contained activities adverse to Avery Pond and the wetlands and watercourses. While the Applicant has made changes, revisions, clarifications, etc, it has

also withdrawn activities and campsites that would have affected Avery Pond as a viable environment—meaning that some of the previous justifications we heard, were in fact inaccurate.

I believe that there are further adjustments to be made, even restrictions, if this Application is to be endorsed.

But first, I want to address “appropriateness of location.” Yes, the property owned by the Mashantucket-Pequot Nation is zoned resort commercial. And it is certainly true that removing RV campers from Foxwood Casino’s parking lots is advantageous to Foxwoods.

But the location is not appropriate—as has been determined—for Avery Pond, wetlands and watercourses. Nor is it “neighborhood compatible” with a neighboring quiet community, long established and enjoyed by tax-paying Preston residents. There is the Casino not far up the road; even closer is a Preston residential neighborhood, which will be impacted. Perhaps Mr. Russ is right about “real-estate values,” although every common sensical bone in my body doubts it. But what about quality of life? The trees will block the campground from the neighbors’ view, Mr Russ asserts. But blocking the view doesn’t make Blue Camp go away. RV pollution of the air by carbon emissions, light and noise pollutions will not be blocked.

Returning to CT Public Act 21-29.

On page 4 of the act, we are told that a zoning commission is authorized to regulate the height and number of stories or size of buildings and other structures. This is a bill, after all, that has in its focus mostly cluster zoned neighborhoods and affordable housing. The special exception applied for by the Applicant contains few buildings and permanent structures, but transient RV’s cover or densely carpet the site. **The P&Z, we are told by CT Act 21-29, has the authority to determine the percentage of the area (65 acres) that may be occupied. Moreover, the Planning and Zoning Commission can regulate and reduce the density of population.** No, it won’t be resident population, but coming and going daily or roughly every 3 days will be a thousand or more transient tourists. That’s a lot of people in a small town.

And let’s bear in mind that the resort commercial development is proposed for the benefit of the transient residents, their ease and comfort and **NOT to enhance the The Town or its adjacent neighborhoods.**

Asked if Preston residents will be allowed access to the campground, the answer given by Benesch was this : NO.

But Preston residents will suffer from increased traffic in summer months when the number of vehicles using Route 2 is at its highest. The number of people using the campsite crowds the site and especially the wetland areas. With this in mind, please consider 1) eliminating the remaining glam camping sites nestled back in the wetlands. 2) greatly reducing the number of RV parking pads, and by so doing reducing the pressure on the soil and air and water, maintenance, noise, lighting, carbon emissions, and neighborhood and traffic impacts.

The Applicant has cited that it needs 270 camp sites minimum to make a profit. But the Applicant's profit is not the responsibility of P&Z. Let them go elsewhere. I know a casino up the road, not far, which has acres and acres of land.

Let me also ask that the Commission **require and review** any insect/rodent control plan Blue Camp proposes to use. Spraying for mosquitoes, putting out poison for rodents—not acceptable wetlands or close to wetlands activity.

The Commission should also request a plan that details how cleaning and remediating fuel and oil spills will be carried out, due to, Mr La Fontaine writes, “**the number of vehicles on site** and the proximity to the wetlands and Avery Pond.” This plan would be in addition to the regular maintenance checkups on sewage and water treatment network as already proposed. Reducing the number of RV parking sites would lessen the impact of problems caused by their presence.

The proposed recreational campground/parking lot, as currently designed, is simply out of scale: **too big**. It's out of balance with the site and will have a negative impact on the Town of Preston. It is not “small retail.” It is large, ungainly, and potentially—even with all the safe-guards proposed—degrading to the environment, human and natural.

Attorney Heller writes at length about Preston's Plan of Conservation and Development (which on other points he dismisses as irrelevant to our discussions, except when he can make an interpretation favorable to his client). The Plan of Conservation and Development, while drawing attention to and endorsing the agricultural and quiet way of life in Preston, also states, and Attorney Heller emphasizes, that Preston would like to be “business-friendly.” Attorney Heller warns that municipal officials “need to heed the objective” of being business-friendly, saying that developers will evaluate the receptivity of towns as they decide whether or not to make a “capital-based decision,” an “investment” in the town.

I wish to point out that “business-friendly” does not mean that all who apply are welcome.

“Business -friendly” needs to be kept in balance with other valued aspects of Preston's way of life.

Those who wish to invest in the Town of Preston should be aware that they must come with an application for development that **ENHANCES THE QUALITY OF LIFE** in the Town of Preston, as well as adds to its tax base. Resort commercial mentions small scale retail establishments, research, office parks, and tourism, manufacturing and recreational facilities.

Tourism, recreation—okay. But **within scale, within balance, and with attention to Preston's quality of life**.

Having little adverse effect on real estate value is NOT all that is necessary to think about when considering “neighborhood compatibility.” Do not dismiss “neighborhood compatibility” as a value to consider as you evaluate this plan and whether or not it “enhances the site, and the town.”

I stand with those in this room who ask you to reject the Applicant's proposal. If, however, there is a recommendation in favor of the Applicant's proposal, I ask that Preston's Planning and Zoning Commission use its authority to restrict the number of campsites and parking sites, and that in a business-friendly way, allow the Town of Preston also to stand up for itself and its residents' values, preserving the balance between human and natural environments, and the balance between quality of life and quantity of tax dollars.

Respectfully submitted, and with gratitude,

Margaret Gibson