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Good Evening

I would like to thank the Town Planner and Planning and Zoning commission for posting Exhibit 88. This has been very helpful to the citizens of Preston.

I would ask that you consider

Under item number 46;

pairing / property values; I would just like to comment that in the end it is not a formula that determines value. Value is determined by a knowing buyer and a knowing seller. The knowing sellers have already expressed a sense of devaluation and the unknowing buyer has already express that they would not have purchased in the neighborhood recently had they known.

consider a modification requiring the applicant to establish a long-term water quality and aquatic habitat monitoring program at Avery Pond and its outlets, make sure lab permeability testing is done, ensure E&S measures are correctly implemented, inspected and maintained and identify the surrounding wildlife communities, and vegetative species. As recommended by Jean Pillo, Joseph R. Theroux, Carl Nielson, George Knoecklein, and Milan Bull.

consider a design change modification to the easterly side of the property to include a 100 foot buffer and eliminate parking spaces, roadways, and campsites within a 100' buffer of the alewife migration pathway to Long Island Sound. The vegetated buffer will serve the dual purpose of shielding light pollution and filtering stormwater runoff from the developed areas.

Please consider PA 21-29 section (10) "In any municipality that is contiguous to or on a navigable waterway draining to Long Island Sound, (A) be made with reasonable consideration for the restoration and protection of the ecosystem and habitat of Long Island Sound; (B) be designed to reduce hypoxia, pathogens, toxic contaminants and floatable debris on Long Island Sound; and (C) provide that such municipality's zoning commission consider the environmental impact on Long Island Sound coastal resources, as defined in section 22a-93, of any proposal for development."

You are aware of the fish migration path that allows alewives to journey from Long Island Sound to the Thames River to Avery Pond and Amos Lake to spawn, than return. The journey includes Indiantown Brook which encroaches on parcel 495. This should be viewed and treated as a sensitive area requiring a buffer so as not to be disturbed. If fish can migrate from Long Island Sound to Avery Pond so can pathogens, toxic contaminants, and floatable debris. PA21-29 makes it our responsibility to prevent such.

I would like to take a moment to explore responses provided in both Exhibit 84 Benesch Responses to Town Planner and Exhibit 90 Attorney Hellers Response to Planner Supplemental Comment List.

In Question # 29. The town planner asked: Please provide a list of activities that will be planned for the park, including types of activities that will occur on weekends. Will there be evening movies? If so, what will the impact be on the neighbors of any amplifications.

Response - a typical list of activities has been attached to this response letter. There are no proposed outdoor activities that require amplification.

The list provided the following items; tennis court open play, games, kids club, bingo, karaoke within the welcome center. If you visit other Blue Water property websites typical listings are.

- Swimming pool parties
- 4th of July Fireworks
- Mardi Gras
- Car shows
- Wine Festivals
- Beer Festivals
- Food trucks
- Jeep Jamborees

So, I wondered if the applicant could take us outdoors and provide a more inclusive list?

I'm going to address question #35 and #36 together since they have similarities.

35 Can you provide an updated environmental report, including the difference between impact of the farm use versus the RV Park use, and the eutrophication of the pond and its wildlife, etc.?

Response - please see the report of Carl Nielson, already submitted in the record.

36 There were several items added into the record regarding various environmental impacts, please address, especially the impact on the alewife migration, the protentional existence of the tile drainage system, how will it protect riparian vegetative see corridors for the wetland (50 feet), and the artificial lighting (addressed) letter from Jean Pillo from the Eastern CT Conservation District, and the buffer, water quality and stormwater maintenance concerns and impacts on the pond in a letter from George Knoecklein. It is my opinion that this is primarily the concern of the IWWC, but there is a provision in the regulations that indicate that the use will not

Inconsistencies with the POCD

the POCD's concern for the impact of traffic on Poquetanuck Village (RT2A). Poquetanuck Village is listed on the National Register of Historic Places and is bordered by the sensitive natural and archaeological resources of Poquetanuck Cove. Poquetanuck Village will continue to be adversely affected by through-traffic. Page 130 of the Preston POCD.

The POCD raises concerns about land uses and activities above the aquifers posing water quality threats. Accidental spills and leaks are a leading cause of contamination, whether it is from a leaking underground or above-ground contaminants, or from spills on roadways and driveways, excessive or unnecessary use of fertilizers or pesticides, the application of road salts and deicing agents, all find their way into the groundwater potentially harming an aquifer. Please review Page 60 slide 79 of Preston's Plan Of Conservation and Development Connecticut Surficial Aquifer Potential Map – Preston CT

The state's listed threatened species the bald eagle is very present at Avery Pond and the state's listed endangered species Sharp-shinned hawk is listed on e-bird as being identified at Avery Pond. IWWC Exhibit #25 submitted December 21, 2021 provided photos of the bald eagle, blue heron, and osprey, posted on social media by Preston residents from Poquetanuck Cove to Avery Pond to Amos Lake. Sections of Preston's POCD were built around protecting these waterbodies and their respective habitat.

under item number 48;

consider a modification that no wood be taken from the property. Requiring all of snag and den trees remain in tack, no removal of such trees. There are plenty of options for purchasing wood locally. Smokeless firepits still emit carbon monoxide and carbon dioxide, just a reduced amount.

Under item number 49;

The lighting plan does not take into consideration 280 exterior RV lights which will be 11 to 13 foot in height. This neighborhood is already challenged with light pollution that transverses for miles. Light pollution causes visibility disruptions and nuisance especially from glares and the spillover effects which may lead to human health problem. Light pollution also changes the natural illumination at night by brightening the skies and leads to the disruption of the ecosystem. How much more light pollution is acceptable?

adversely impact environmental quality.

Response - Regarding artificial lighting, the photometrics plan indicates no light spillage onto the pond. Through extensive site investigation conducted by the Applicant's professional consultants, there has been no evidence of the presence of tile drains on the site. Attorney Heller will submit an answer to the additional concerns with a supplemental letter.

Can the applicant please disclose which professional consultants performed the investigation of tile drains and what methods were used. As explained in Exhibit 62 this is crucial to indicating that the use will not adversely impact environmental quality.

Many references were made to prior reports while the Town Planner asked for updated information. Many changes have been made since most of these reports were written.

In regards to the alewife migration, the concern that needs to be address here is taken directly from Exhibit #62 **“Resource Concern:** ECCD would like to assure that any future development along the shore of Avery Pond or its outlets, Indiantown Brook and the unnamed stream channel draining from the southern end of the pond, will not impede or impact the efforts to restore the historic alewife fish migration route to Avery Pond, or the breeding habitat of Avery Pond.”

My comments The alewife migration pathway needs to be buffered to ensure no disturbance whether by construction, runoff, or human activity. PA 21-29 section (10)

The important message is that alewives tie our ocean, rivers and lakes together, providing vital nutrients and forage needed to make healthy watersheds. Between and within those various habitats, everything eats alewives: fresh and salt water fish, seabirds, bald eagle, osprey, great blue heron, gulls, terns, cormorants, seals, whales, otter, mink, fox, raccoon, skunk, weasel, fisher, and turtles. Alewives have been central to the web of life in Connecticut for millennia. Fish are an important part of our natural heritage. They also are an important link in the food web, consuming vegetation or smaller animals and providing food for wildlife. When they die, their carcasses can provide nutrients for plants.

Speaking to environmental quality impact

Exhibit #62 Prevent further nutrient enrichment of Avery Pond: Stormwater management is the primary concern. Stormwater runoff from new development should be managed to minimize overland flow. If infiltration basins are utilized as a stormwater management practice, the soil must be properly perk tested to assure the basin can capture and infiltrate at least the first inch of runoff.

According to the 2004 CT Stormwater Quality Manual, the bottom of an infiltration facility should be located at least 3 feet above the seasonally high-water table or bedrock, and documented on site by lab permeability testing. Percolation testing used for septic systems is not adequate.¹ Stormwater infiltration basins designed for the edge of wetland soils may not function in those locations.

In a review letter of February 10, 2022 from Joseph R. Theroux, certified forester and soil scientist, addressed to the Preston Inland Wetlands and Watercourses Commission. The concluding paragraph in that correspondence states "It is my opinion that due to the revisions in the design plans, there will be no significant impacts to the wetlands due to the construction and operation of the proposed project provided that the proposed E&S measures are correctly implemented, inspected and maintained."

Although he was speaking to IWWC addressing wetlands this speaks to environmental quality impact.

If there are no provision to monitor the waterbodies than what are the measurements to prove E&S measures are correctly implemented, inspected, and maintained?

In Exhibit #61 Dr. Knoecklein, Limnologist writes a complete species list of vegetation in each wetland should be developed so that an analysis of any habitat quality loss can be made.

In Exhibit # 63 Milam Bull, Senior Director of Science and Conservation Connecticut Audubon Society suggested a complete on-site survey would be an important requirement to identify and mitigate potential impacts on wildlife communities including turtles, snails, mammals, birds, reptiles and amphibians.

To answer question number 36 the Town Planner was directed to the report of limnologist Carl Nielson. In Mr. Nielson report the following design improvements were required;

- Establishment of a 100-foot buffer along the pond shoreline with no development and maintenance of naturally occurring native vegetative cover and tree growth.
- Elimination of parking spaces, roadways, and camp sites within the 100-foot buffer to the pond.
- Elimination of the dock at Avery Pond.
- Stormwater runoff to the pond from developed areas has been essentially eliminated with all drainage being diverted to properly designed stormwater features that discharge to tributaries that flow out of the pond.

I asked Mr. Nielson about the diversion to stormwater features that discharge to tributaries that flow out of the pond. His response was he was hired to evaluate only the pond. Mr. Nielson required certain design changes and states above with all drainage being diverted to properly designed stormwater features that discharge to tributaries that flow out of the pond. Yet the applicant implies that there is no discharge to the tributaries that flow out of the pond. There should be a clarification here.

I think these five professionals have summed it up. The only way to know if all of these formulas and 18-year-old regulations still work is through monitoring. Establish a long-term water quality and aquatic habitat monitoring program at Avery Pond and its outlets, make sure lab permeability testing is done, ensure E&S measures are correctly implemented, inspected, and maintained and identify the surrounding wildlife communities, and vegetative species.

This project is a huge proposal for which detailed environmental impact studies have not been completed. Wildlife and vegetative communities have not been identified. How can the effects of such a large proposal be judged without this due diligence?

Please consider reducing the number of sites to 180 reducing the number of transient people per day to 1,080 into our small town

Respectfully Submitted
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