



Ms. Barbara B. Johnston
PO Box 804
East Lyme, CT 06333

Town of East Lyme - Town Hall
% Gary Upton, Chairman of Inland Wetland
Agency

P.O. Box 519
108 Pennsylvania Ave
Niantic, CT 06357

% Chairman +
Commission
only

10-22-2020

Barbara Johnston

On Monday, September 14, 2020, 11:59:51 AM EDT, Jennifer Lindo <jlindo@eltownhall.com> wrote:

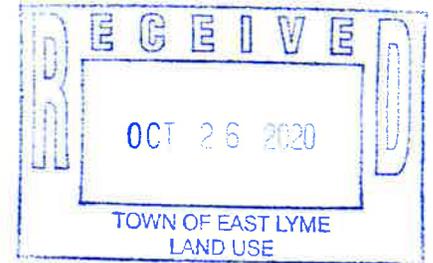
Barbara,

The IWA Statewide Activity Reporting Form does NOT get an "answer" and we do not get a "date received".

In the history of my working here, the information you are asking for does not exist. *

Jenn

Jennifer Lindo
Administrative Assistant, Land Use
Town of East Lyme
108 Pennsylvania Ave
PO Box 519
Niantic, CT 06357
(860) 691-4114
Fax: (860) 691-0351



—Original Message—

From: babara johnston <lyme1234@yahoo.com>
Sent: Friday, September 11, 2020 3:27 PM
To: Jennifer Lindo <jlindo@eltownhall.com>
Subject: Inland & Wetlands Statewide Activity Reporting Form

* Hello - Jenn I would like to ask if the form named above has an answer from DEEP for the Perry sub-division & can I please have a copy sent to me PDF ? I'm especially interested in the date received.

Thanks,

Barbara Johnston

P S If same form has been received for the Kensington property (still open as public hearing) that is in East Lyme Land Trust too.

SAVE

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barbara.johnston

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FW: Inland & Wetlands Statewide Activity Reporting Form

lyme1234@yahoo.../Inbox



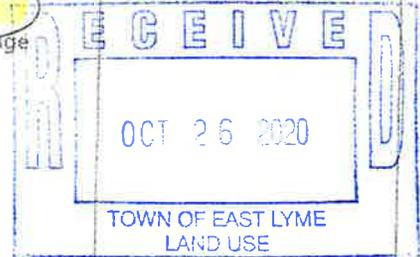
Blatt, David <david.blatt@ct.gov>

To: lyme1234@yahoo.com <lyme1234@yahoo.com>

Cc: Grzywinski, Micheal <micheal.grzywinski@ct.gov>,
Balint, Marcy <marcy.balint@ct.gov>,
Golembiewski, Brian <brian.golembiewski@ct.gov>

Sep 14 at 4:31 PM

Print Raw message



Ms. Johnston-

Micheal Grzywinski asked me to respond to your request. From what I can tell, you are looking for a copy of a municipal inland wetland commission reporting form. As Jennifer Lindo advised you, these forms are simply administrative; DEEP does not review or approve them, nor do we notify the municipality of receipt. The forms are filed at 79 Elm Street and, as time allows, entered in a database. Only those forms received prior to 2018 have been entered.

Please note that any records of decision or application files for municipal inland wetlands, subdivision or land use approvals are kept at town hall. If you wish to review such documents, you should pursue your inquiries with the East Lyme Land Use Department. I hope this helps clarify your issue.

David J. L. Blatt
Supervising Environmental Analyst
Land and Water Resources Division
Bureau of Water Protection and Land Reuse
Department of Energy and Environmental Protection
79 Elm Street

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- Drafts
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(7,228 unread) - lyme1234@yahoo.com - Yahoo Mail

Oct 19 at 7:50 PM Cindy Trocki <cmaries70@icloud.com>

To: babara johnston <lyme1234@yahoo.com>

Topic:

FORESTS; FOREST MANAGEMENT; LAND USE; WOOD; MUNICIPALITIES; PERMITS; ZONING; WETLANDS;

Location:

PARKS AND FORESTS; TREES;



March 21, 2006 2006-R-0242 **MUNICIPAL REGULATION OF FOREST PRACTICES** By: Kevin E. McCarthy, Principal Analyst You asked for a discussion of mechanisms municipalities can use to regulate clear-cutting of trees and other forest practices. **SUMMARY** Municipalities can restrict clear-cutting and other forest practices on proposed new development requiring wetland, subdivision, and zoning approval. Under certain circumstances, they can regulate clear-cutting unrelated to development under wetland and ridgeline protection regulations, but state law generally preempts municipalities from regulating commercial forest practices on undeveloped land. In addition to these regulatory mechanisms, which apply to private land, municipal tree wardens may adopt regulations regarding the care and preservation of trees and shrubs in the right of way of town roads and impose reasonable fines for violating such regulations. **WETLANDS (CGS § 22A-38 ET SEQ.)** The law requires municipalities to regulate certain activities affecting inland wetlands, which may include cutting and removing trees. No regulated activity can take place in a wetland without a permit issued by the inland wetland agency. Agencies can also regulate activities in upland areas outside of the wetland, but only if in practice they are likely to affect the wetland. By law, regulated activities are those operations within, or use of, a wetland or watercourse that involve (1) removal or deposition of material of the wetland or watercourse or (2) obstruction, construction, alteration, or pollution of the wetland or watercourse (CGS § 22a-38). The law allows municipal wetlands regulations to go beyond the Department of Environmental Protection regulations, so long as they are consistent with the state regulation. Several towns, including Canterbury, Killingly, Rocky Hill, Stonington, Vernon, West Hartford, Windsor, and Woodbury, specifically regulate clear-cutting in wetlands, and in some cases in upland areas under their regulations. In addition, several towns require permits for commercial logging in wetlands. Developers must apply for a wetland permit when they apply for planning and zoning approval of project that impinges on a wetland, and planning and zoning commissions cannot act until the wetlands agency acts (see CGS §§ 8-3(g), 8-3c, and 8-

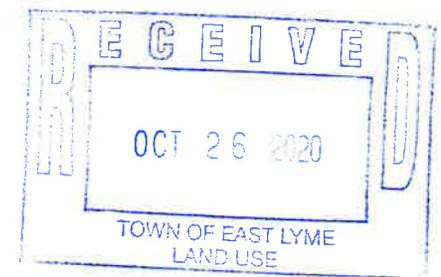
26). By law, municipalities can require developers to modify plans in ways that mitigate a project's impact on inland wetlands. **SUBDIVISION REGULATION (CGS § 8-25)** The statutes allow municipalities to adopt subdivision regulations, which require developers to prepare raw land for development in a way that promotes public health and safety. Among other things, the regulations must ensure that developers take steps to control soil erosion and sedimentation. For this reason, regulations can restrict the removal of trees or clear cutting as a means of minimizing erosion and sedimentation. In Greenwich, for example, if a developer proposes to clear-cut subdivided lots, the town will often require that an erosion and sedimentation control be implemented, particularly if the stumps will be removed and the area graded. Middlefield takes a different approach in areas zoned as Environmental Conservation Rural districts. In these areas, lots must be designed based on "consideration, respect and reasonable preservation" of indigenous vegetation such as mature specimen trees, among other things. The regulations may also require developers to provide open spaces. To achieve this purpose, the municipal subdivision regulations may require the retention of groves of trees as part of their open space requirements. For example, Killingly requires developers to identify existing large trees on their subdivision plans and has used this information to protect existing groves. **ZONING (CGS § 8-2 ET SEQ.)** *Site Plan Review (CGS § 8-3(g))* The law allows zoning regulations to require that a site plan be filed with an application to determine whether a proposed structure conforms with the specific provisions of the regulations. If the site plan involves an activity regulated by a wetlands agency, the plan must also be submitted to that agency. The Coastal Area Management law requires 41 municipalities to review site plans of proposed projects in state-designated coastal areas to determine if they will have any potentially adverse effects on coastal resources, including the visual quality of "natural vistas and view points". The requirement applies to any projects requiring zoning, subdivision, and resubdivision approval, and municipal projects requiring the local planning commission's comments (CGS § 22a-105 (a)). Developers proposing projects in the coastal areas must submit a site plan that, among other things, shows the location of coastal resources on and adjacent to the site and assesses the extent to which the coastal resources can accommodate the proposed use. The municipality may approve, modify, condition, or deny the plan, depending on whether the project's potential adverse effects (including harm to visual quality and erosion) are acceptable. Municipalities have discretion in how they deal with potential adverse effects. For example, Westport requires proposed land uses that need to be located near the water provide scenic views or vista preservation easements, in addition to other amenities. *Special Permits (CGS § 8-2 (a))* Special permits allow municipalities to address problems peculiar to an otherwise permitted use. The statutes set two conditions under which municipalities can require special permits: (1) the standards for getting the permit must be specified in the zoning regulations and (2) the reasons for requiring the permit must be to protect public health, safety, convenience, and property values. These provisions can be used to regulate clear cutting in a proposed project. For example, Wallingford often requires that trees be saved as a condition of granting a special permit, most recently in the development of a Home Depot store, where several large trees were saved by designing landscaped areas around them. Stonington and several other municipalities require the retention of vegetated buffers in connection with special permit developments. *Viewsheds* Under the Coastal Management Act, coastal municipalities must review and approve site plans in coastal areas for consistency with the act's policies. The review must determine if a site plan will adversely affect scenic viewpoints and other coastal

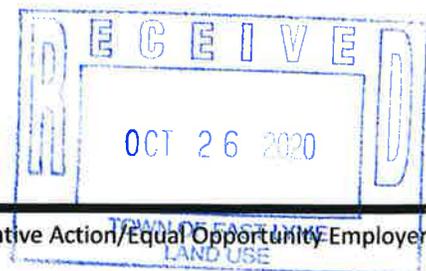
resources and decide if the effects are acceptable. The law defines adverse effects and the criteria for determining what effects are acceptable (CGS § 22a-93(15)). Developers, not municipalities, must prove that a site plan is consistent with the law and that the potential adverse effects are acceptable.

A number of non-coastal municipalities have taken or are considering taking steps to protect viewsheds. Vernon's Conservation Commission is currently drafting regulations for proposal that would address viewshed impacts of developments and timbering and clear cutting on undeveloped lots.

Ridgeline Protection (CGS §§ 8-1aa and 8-2) The law authorizes zoning regulation of developments in setback areas along 44 named traprock ridgelines and four named hills. It defines the setback as the area bounded by (1) a line that parallels the ridgeline at a distance of 150 feet on its more wooded side and (2) the contour line on its rockier side where the slope is less than 50% for 50 or more feet. The regulation can, among other things, restrict clear cutting. On the other hand, municipalities must permit selective timbering and certain other activities as of right in these areas.

PREEMPTION OF LOCAL FOREST PRACTICES REGULATION (CGS § 23-65F ET SEQ.) The law preempts municipalities from regulating certain forest practices. By law, forest practices are activities that may alter the physical or vegetative characteristics of forest land that is undertaken in connection with the harvest of commercial forest products. "Forest land" is a portion of a parcel of land (1) that is at least one acre in size and meets other criteria and (2) that has no structures, maintained landscaping, accessway or other improvement. Commercial forest products are those produced from forest land in amounts greater than 50 cords, 150 tons, or 25,000 board feet of wood, whichever measure is appropriate, in any 12-month period. The preemption does not apply if the harvest is undertaken to convert forest land to other uses and the conversion has been approved by the planning or zoning commission (under certain circumstances, the wetlands agency also must also approve). In addition, the preemption does not apply to 20 municipalities, if the Department of Environmental Protection approves their forest practices regulations. They are: Berlin, Brookfield, Chester, Deep River, East Haddam, Essex, Glastonbury, Granby, Haddam, Kent, Lyme, Newtown, Old Lyme, Old Saybrook, Redding, Stafford, Somers, Warren, Washington, and Willington. KM:ro





STATEWIDE INLAND WETLANDS & WATERCOURSES ACTIVITY REPORTING FORM

Pursuant to section 22a-39(m) of the General Statutes of Connecticut and section 22a-39-14 of the Regulations of Connecticut State Agencies, inland wetlands agencies must complete the Statewide Inland Wetlands & Watercourses Activity Reporting Form for **each** action taken by such agency.

This form may be made part of a municipality's inland wetlands application package. If the municipality chooses to do this, it is recommended that a copy of the Town and Quadrangle Index of Connecticut and a copy of the municipality's subregional drainage basin map be included in the package.

Please remember, the inland wetlands agency is responsible for ensuring that the information provided is **accurate** and that it reflects the **final** action of the agency. Incomplete or incomprehensible forms will be mailed back to the agency. Instructions for completing the form are located on the following pages.

The inland wetlands agency shall mail completed forms for actions taken during a calendar month no later than the 15th day of the following month to the Department of Energy and Environmental Protection (DEEP). Do **not** mail this cover page or the instruction pages. Please mail **only** the **completed** reporting form to:

DEEP Land & Water Resources Division
Inland Wetlands Management Program
79 Elm Street, 3rd Floor
Hartford, CT 06106

Questions may be directed to the DEEP's Inland Wetlands Management Program at (860) 424-3019.

INSTRUCTIONS FOR COMPLETING THE STATEWIDE INLAND WETLANDS & WATERCOURSES ACTIVITY REPORTING FORM

*Use a separate form to report EACH action taken by the Agency. Complete the form as described below.
Do NOT submit a reporting form for withdrawn actions.*

PART I: Must Be Completed By The Inland Wetlands Agency

1. Choose the year and month the Inland Wetlands Agency took the action being reported. If multiple actions were taken regarding the same project or activity then multiple forms need to be completed.
2. Choose ONE code letter to describe the final action or decision taken by the Inland Wetlands Agency. Do NOT submit a reporting form for withdrawn actions. Do NOT enter multiple code letters (for example: if an enforcement notice was given and subsequent permit issued - two forms for the two separate actions are to be completed).
 - A = A Permit Granted by the Inland Wetlands Agency (not including map amendments, see code D below)
 - B = Any Permit Denied by the Inland Wetlands Agency
 - C = A Permit Renewed or Amended by the Inland Wetlands Agency
 - D = A Map Amendment to the Official Town Wetlands Map - or -
An Approved/Permitted Wetland or Watercourse Boundary Amendment to a Project Site Map
 - E = An Enforcement Action: Permit Revocation, Citation, Notice of Violation, Order, Court Injunction, or Court Fines

 - H = An Appeal of Agent Approval Pursuant to 22a-42a(c)(2)
3. Check "yes" if a public hearing was held in regards to the action taken; otherwise check "no".
4. Enter the name of the Inland Wetlands Agency official verifying that the information provided on this form is accurate and that it reflects the FINAL action of the agency.

PART II: To Be Completed By The Inland Wetlands Agency Or The Applicant - If Part II is completed by the applicant, the applicant MUST return the form to the Inland Wetlands Agency. The Inland Wetlands Agency MUST ensure that the information provided is accurate and that it reflects the FINAL action of the Agency.

5. Enter the name of the municipality for which the Inland Wetlands Agency has jurisdiction and in which the action/project/activity is occurring.

Check "yes" if the action/project/activity crosses municipal boundaries and enter the name(s) of the other municipality(ies) where indicated. Check "no" if it does not cross municipal boundaries.
6. Enter the USGS Quad Map name or number (1 through 115) as found on the Connecticut Town and Quadrangle Index Map (the directory to all USGS Quad Maps) that contains the location of the action/project/activity. Click on the following website for USGS Quad Map information: http://ct.gov/deep/lib/deep/gis/resources/Index_NamedQuadTown.pdf

ALSO enter the four-digit identification number of the corresponding Subregional Drainage Basin in which the action/project/activity is located. If the action/project/activity is located in more than one subregional drainage basin, enter the number of the basin in which the majority of the action/project/activity is located. Town subregional drainage basin maps can be found at UConn CLEAR's website: http://clear.uconn.edu/data/map_set/index.htm (no roads depicted) or at CTECO: http://www.cteco.uconn.edu/map_catalog.asp (depicts roads, choose town and a natural drainage basin map).
7. Enter the name of the individual applying for, petitioning, or receiving the action.
8. Enter the name and address or location of the action/project/activity. Check if the action/project/activity is TEMPORARY or PERMANENT in nature. Also provide a brief DESCRIPTION of the action/project/activity. It is always best to provide as much information as possible (i.e., don't just state "forestry", provide details such as "20 acre forestry harvest, permit required for stream crossing".)

9. Carefully review the list below and enter ONLY ONE code letter which best characterizes the action/project/activity. All state agency projects must code "N".

- | | |
|--|--|
| A = Residential Improvement by Homeowner | I = Storm Water / Flood Control |
| B = New Residential Development for Single Family Units | J = Erosion / Sedimentation Control |
| C = New Residential Development for Multi-Family / Condos | K = Recreation / Boating / Navigation |
| D = Commercial / Industrial Uses | L = Routine Maintenance |
| E = Municipal Project | M = Map Amendment |
| F = Utility Company Project | N = State Agency Project |
| G = Agriculture, Forestry or Conservation | P = Other (this code includes the approval of |
| H = Wetland Restoration, Enhancement, Creation | concept plans with no-on-the-ground work) |

10. Enter between one and four code numbers to best characterize the project or activity being reported. Enter "NA" if this form is being completed for the action of map amendment. You MUST provide code 12 if the activity is located in an established upland review area. You MUST provide code 14 if the activity is located beyond the established upland review area or no established upland review area exists.

- | | |
|--|---|
| 1 = Filling | 8 = Underground Utilities Only (no other activities) |
| 2 = Excavation | 9 = Roadway / Driveway Construction |
| 3 = Land Clearing / Grubbing (no other activity) | 10 = Drainage Improvements |
| 4 = Stream Channelization | 11 = Pond, Lake Dredging / Dam Construction |
| 5 = Stream Stabilization (includes lakeshore stabilization) | 12 = Activity in an Established Upland Review Area |
| 6 = Stream Clearance (removal of debris only) | 14 = Activity in Upland |
| 7 = Culverting (not for roadways) | |

Examples: Jurisdictional ruling allowing construction of a parking lot in an upland where the municipality does not have an established upland review area must use code 14, other possible codes are 2 and 10. Permitted construction of a free standing garage (residential improvement by homeowner) partially in an established upland review area with the remainder in the upland must use code 12 and 14, other possible codes are 1 and 2.

11. Leave blank for TEMPORARY alterations but please indicate action/project/activity is temporary under question #8 on the form. For PERMANENT alterations, enter in acres the area of wetland soils or watercourses altered. Include areas that are permanently altered, or are proposed to be, for all agency permits, denials, amendments, renewals, jurisdictional rulings, and enforcement actions. For those activities that involve filling or dredging of lakes, ponds or similar open water bodies enter the acres filled or dredged under "open water body". For those activities that involve directly altering a linear reach of a brook, river, lakeshore or similar linear watercourse, enter the total linear feet altered under "stream". Remember that these figures represent only the acreage altered not the total acreage of wetlands or watercourses on the site. You MUST provide all information in ACRES (or linear feet as indicated) including those areas less than one acre. To convert from square feet to acres, divide square feet by the number 43,560. If this report is being completed for an agency jurisdictional ruling and detailed information is not available, provide an estimate. Enter zero if there is no alteration.
12. Enter in acres the area of upland altered as a result of an ACTIVITY REGULATED BY the inland wetlands agency, or as a result of an AGENT APPROVAL pursuant to CGS section 22a-42a(c)(2). Leave blank for TEMPORARY alterations but please indicate action/project/activity is temporary under question #8 on the form. Include areas that are permanently altered, or proposed to be permanently altered, for all agent approvals, agency permits, denials, amendments, renewals, jurisdictional rulings, and enforcement actions. You MUST provide all information in ACRES including those areas less than one acre. See directions above (#11) for conversion factor. If this report is being completed for an agent approval or an agency jurisdictional ruling and detailed information is not available, provide an estimate. Enter zero if there is no alteration.
13. Enter the acres that are, or are proposed to be, restored, enhanced or created for all agency permits, denials, amendments, renewals, jurisdictional rulings and enforcement actions. NOTE restored or enhanced applies to previously existing wetlands or watercourses. Created applies to a non-wetland or non-watercourse area which is converted into wetlands or watercourses (question #10 must provide 12 and/or 14 as an answer, and question #12 must also be answered). You MUST provide all information in ACRES including those areas less than one acre. See directions above (#11) for conversion factor. Enter zero if there is no restoration, enhancement or creation.

PART III: To Be Completed By The DEEP - Please leave this area blank. Incomplete or incomprehensible forms will be mailed back to the inland wetlands agency.



Statewide Inland Wetlands & Watercourses Activity Reporting Form

Please complete and mail this form in accordance with the instructions on pages 2 and 3 to:

DEEP Land & Water Resources Division, Inland Wetlands Management Program, 79 Elm Street, 3rd Floor, Hartford, CT 06106

Incomplete or incomprehensible forms will be mailed back to the inland wetlands agency.

PART I: Must Be Completed By The Inland Wetlands Agency

- DATE ACTION WAS TAKEN: year: _____ month: _____
- ACTION TAKEN (see instructions, only use one code): _____
- WAS A PUBLIC HEARING HELD (check one)? yes no
- NAME OF AGENCY OFFICIAL VERIFYING AND COMPLETING THIS FORM:
(print name) _____ (signature) _____

PART II: To Be Completed By The Inland Wetlands Agency Or The Applicant

- TOWN IN WHICH THE ACTION IS OCCURRING (print name): _____
does this project cross municipal boundaries (check one)? yes no
if yes, list the other town(s) in which the action is occurring (print name(s)): _____
- LOCATION (see instructions for information): USGS quad name: _____ or number: _____
subregional drainage basin number: _____
- NAME OF APPLICANT, VIOLATOR OR PETITIONER (print name): _____
- NAME & ADDRESS / LOCATION OF PROJECT SITE (print information): _____
briefly describe the action/project/activity (check and print information): temporary permanent description: _____
- ACTIVITY PURPOSE CODE (see instructions, only use one code): _____
- ACTIVITY TYPE CODE(S) (see instructions for codes): _____
- WETLAND / WATERCOURSE AREA ALTERED (must provide acres or linear feet):
wetlands: _____ acres open water body: _____ acres stream: _____ linear feet
- UPLAND AREA ALTERED (must provide acres): _____ acres
- AREA OF WETLANDS / WATERCOURSES RESTORED, ENHANCED OR CREATED (must provide acres): _____ acres

DATE RECEIVED:

PART III: To Be Completed By The DEEP

DATE RETURNED TO DEEP:

FORM COMPLETED: YES NO

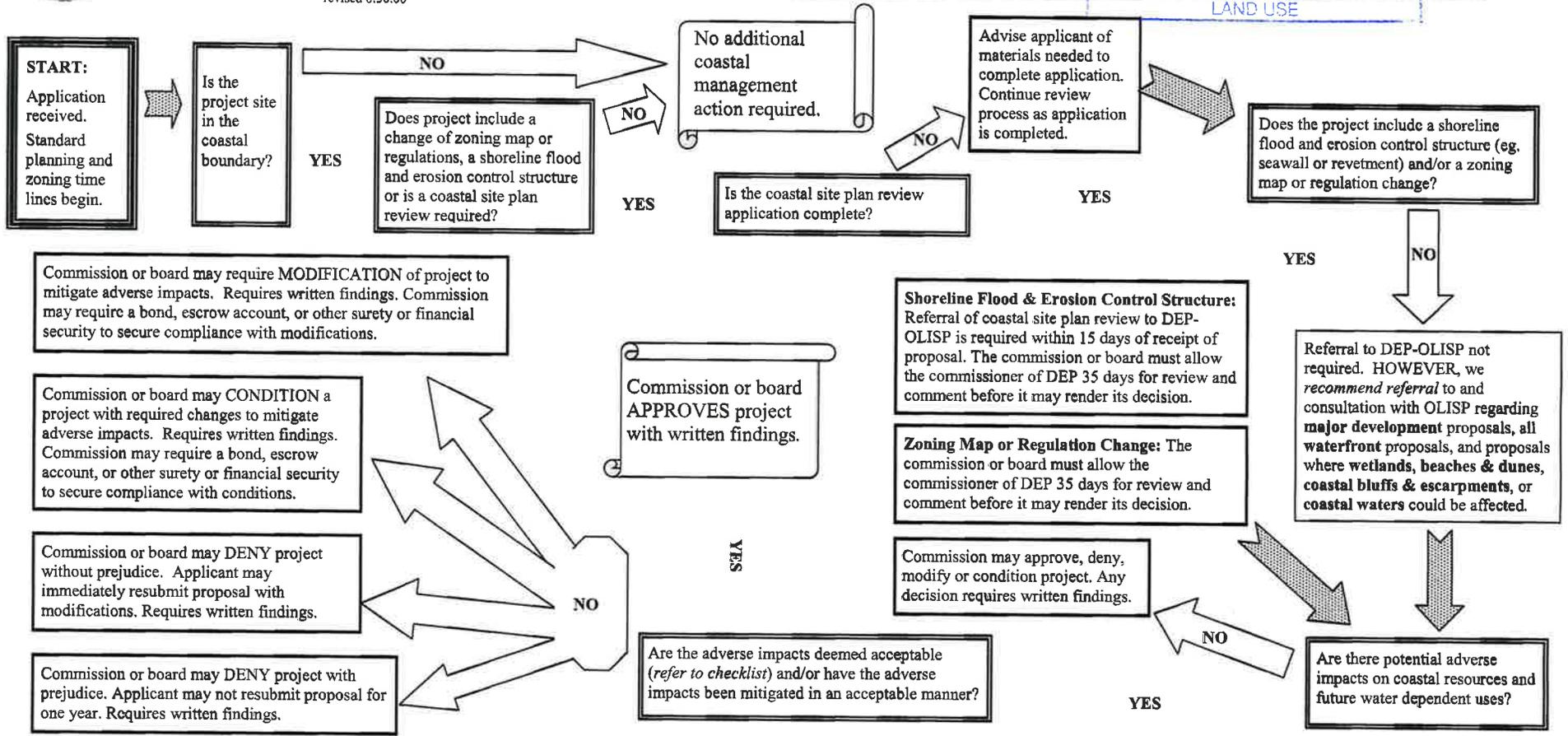
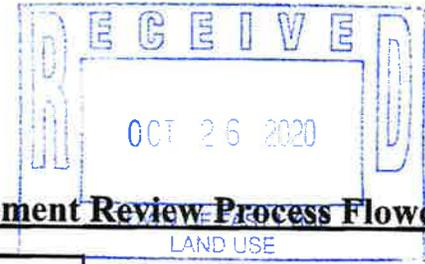
FORM CORRECTED / COMPLETED: YES NO



Office of Long Island Sound Programs

revised 8.30.00

Municipal Coastal Management Review Process Flowchart



NOTES:

- 1) The Commissioner of the Department of Environmental Protection is automatically a party to every municipal coastal site plan review and has the right to appeal a municipal decision.
- 2) If the board or commission does not render a decision within a statutorily allowed time frame (at least 65 days), the coastal site plan is deemed **rejected**.
- 3) A copy of any coastal site plan review decision must be sent to the applicant by certified mail, and must be published in the newspaper within 15 days of the decision. If the proposal includes a shoreline flood & erosion control structure the decision must also be sent to DEP-OLISP.



Office of Long Island Sound Programs

COASTAL SITE PLAN REVIEW

APPLICATION CHECKLIST

WHAT IS REQUIRED FOR A COMPLETE APPLICATION



This checklist has been developed to assist the commission or board or its staff in determining the completeness of a coastal site plan review application. To ensure that adequate information has been provided for a thorough project evaluation, coastal site plan review applications must contain specific information, as required by Connecticut General Statutes section 22a-105(c). If any of the items listed below is missing from such an application, the applicant should be advised of the information or materials necessary to complete the application.

A complete coastal site plan application should include the following information:

- Clear and accurate plan(s) of the entire project indicating:
 - proposed location/locus map
 - location of all existing buildings, structures, and uses
 - location of all proposed buildings, structures, and uses
 - all proposed site improvements and alterations, including location and extent of land disturbance and/or grading
 - ownership (site ownership or applicant's interest in the site)
 - uses on adjacent properties
 - location and spatial relationship of all coastal resources on and contiguous to the site
- A description of the entire project, including types of existing and proposed buildings, structures, and uses
- Coastal Resources - identification of all resources on and adjacent to the site from following list:
 - general resource*
 - beaches and dunes
 - bluffs and escarpments
 - coastal flood hazard area
 - coastal hazard area
 - coastal waters/estuarine embayments
 - developed shoreline
 - freshwater wetlands/watercourse
 - intertidal flats
 - islands
 - rocky shorefronts
 - shellfish concentration area
 - shorelands
 - tidal wetlands

This identification of coastal resources leads directly to identification of the appropriate resource policies in the CCMA applicable to the project.

- An assessment of the condition of the resources and their capability to accommodate the proposed structure or use
- Coastal Use Policies - identification of all applicable policies from the following list:

<input checked="" type="checkbox"/> general development*	<input type="checkbox"/> fisheries
<input type="checkbox"/> boating	<input type="checkbox"/> fuel, chemical and hazardous materials
<input type="checkbox"/> coastal recreation and access	<input type="checkbox"/> open space and agricultural lands
<input type="checkbox"/> coastal structures and filling	<input type="checkbox"/> ports and harbors
<input type="checkbox"/> cultural resources	<input type="checkbox"/> sewer and water lines
<input type="checkbox"/> dams, dikes and reservoirs	<input type="checkbox"/> solid waste
<input type="checkbox"/> dredging and navigation	<input type="checkbox"/> transportation
<input type="checkbox"/> energy facilities	<input type="checkbox"/> water-dependent uses
- An assessment of how the proposal is consistent with all applicable resource and use policies
- An assessment of the suitability of the project for the proposed location, especially if the project site is waterfront or abuts tidal wetlands
- Methods and timing of construction
- Methods of stormwater management, including methods for retention and/or treatment
- Description of the type and extent of development adjacent to the site
- An evaluation of the potential beneficial and adverse impacts of the project and a description of proposed methods to mitigate, or lessen, any unavoidable adverse impacts
- Identification of whether the site is a waterfront location (includes sites fronting on tidal wetlands and open coastal waters) and, if so, an indication of whether the proposal is or is not water-dependent and why
- Description of impacts or effects the project will have on future water-dependent uses or water-dependent development on and adjacent to the site
- Description of proposed measures to mitigate, or lessen, any unavoidable adverse impacts on future water-dependent development opportunities

*General Resource and General Development policies apply to all sites and uses.