

SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

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(Via electronic mail)

November 10, 2020

Mr. Kirk Scott
Chairman
Town of East Lyme Planning Commission
PO Box 519
Niantic, CT 06357

Dear Mr. Scott:

I am pleased to submit my comments regarding the Town of East Lyme's draft Plan of Conservation and Development (POCD), which will be the subject of a public hearing tonight, November 10th. The plan was referred to this agency in accordance with Section 8-23(h)(4) of the Connecticut General Statutes.

Consistency with the Regional POCD

Overall, the draft POCD is very consistent with the Southeastern Connecticut Council of Governments' (SCCOG's) Regional POCD, adopted in 2017. This section identifies themes and recommendations that are common between the two documents, organized by chapter of the draft POCD.

Agriculture (Chapter 3): Accommodation of new and accessory agricultural uses; identify infrastructure/industry gaps (e.g.: an aquaculture hub).

Coastal Resources (Chapter 4): Stormwater runoff mitigation/MS4 compliance; water resource protection; floodplain management and storm resilience; open space and coastal access.

Historic Resources (Chapter 5): Historic property maintenance; use of demolition delay ordinance; identification of additional historic resources.

Natural Resources (Chapter 6): Stormwater runoff mitigation/MS4 compliance; storm resilience; water resource protection; low-impact development.

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Open Space (Chapter 7): Open space linkages/corridors; coastal access; sea-level rise.

Residential Development (Chapter 8): Cluster/low-impact development; identification of affordability gaps; home business accommodation; accessory apartment accommodation.

Commercial and Industrial Development (Chapter 9): Accommodation of new and accessory agricultural uses; compact, village-style development; traffic management.

Economic Development (Chapter 10): Tourism promotion/signage; compact, village-style development; accommodation of new and accessory agricultural uses; home business accommodation; transit and bicycle/pedestrian promotion (e.g.: in downtown Niantic); promotion of business types compatible with existing area industry clusters.

Community Spaces & Recreation (Chapter 11): Water resource protection; open space acquisition; coastal/water access; bicycle pedestrian planning/infrastructure; historic resource identification.

Clean and Reliable Energy (Chapter 12): Microgrid evaluation/development.

Water and Wastewater Management (Chapter 13): Water resource protection; water supply conservation and adequacy; aquifer protection; evaluation of on-site wastewater treatment where appropriate (e.g.: package plants); protection of critical infrastructure from flooding.

Municipal Solid Waste Management (Chapter 14): The regional POCD does not contain any goals/objectives related to solid waste management.

Transportation (Chapter 15): Promotion/accommodation of multi-modal transportation and inter-modal transportation; bicycle and pedestrian transportation accommodation; context-sensitive road design/traffic calming; access management on high-traffic roads; evaluation of parking regulations; stormwater runoff mitigation/MS4 compliance; floodplain management and storm resilience.

Emergency Services (Chapter 16): Floodplain management and storm resilience; sea-level rise.

Sustainable Municipal Finance (Chapter 17): Strategic/cost-effective capital expenditures; open space acquisition.

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Consistency with the State POCD

The draft POCD is also quite consistent with the State POCD, adopted in 2013. This section discusses commonalities between the State POCD and the draft POCD, organized by the six Growth Management Principles (GMPs) of the State POCD.

GMP #1, Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure: The draft POCD places emphasis on concentrating development in downtown Niantic and Flanders, as well as existing commercial/industrial corridors. The draft POCD also focuses on managing and prioritizing the Town's constrained sewerage capacity. Overall, the draft POCD promotes a smart-growth ethic consistent with this GMP.

GMP #2, Expand Housing Opportunities and Design Choices to Accommodate a Variety of Household Types and Needs: The draft POCD discusses the need for additional affordable housing and completion of an affordable housing plan. The draft POCD also calls for allowance of accessory apartments. The draft POCD promotes a variety of new household types, including cluster-style residential development.

GMP #3, Concentrate Development Around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options: The draft POCD places emphasis on bicycle and pedestrian infrastructure, as well as multi-modal transportation, particularly in Niantic and Flanders, which are areas of town promoted for compact development. The draft POCD also identifies corridors for future trails.

GMP #4, Conserve and Restore the Natural Environment, Cultural and Historical Resources, and Traditional Rural Lands: The draft POCD recommends a number of actions that seek to promote continuance of agriculture, enhancement and protection of historic properties and resources, and natural resource/open space protection. The draft POCD also places great emphasis on coastal management and water quality protection.

GMP #5, Protect and Ensure the Integrity of Environmental Assets Critical to Public Health and Safety: The draft POCD calls for protection of water resources, including drinking water supplied by the town's stratified-drift aquifers. The draft POCD identifies recommendations for floodplain management, including the need to protect key infrastructure from sea-level rise and coastal storms.

GMP #6, Promote Integrated Planning across all Levels of Government to Address Issues on a Statewide, Regional, and Local Basis: The draft POCD incorporates principles of the local water and wastewater plans, as recommended by the State POCD. This encourages growth compatible with the realities of water and wastewater service in town.

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Consistency with other local POCDs

The SCCOG Regional POCD includes a Future Land Use Map (page 150), which is representative of local planning in the SCCOG region, including the Towns of Waterford, Salem, and Montville. Areas abutting the Towns of Waterford, Salem, and Montville in northern East Lyme are generally low-density, similar to conditions in those neighboring towns. Additionally, the Waterford POCD and the draft East Lyme POCD reflect a common need to manage water quality in the Niantic River estuary, which forms a town boundary.

If you have any questions, please contact me at 860-889-2324.

Sincerely,



Samuel Alexander, AICP
Planner III
salexander@seccog.org

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