



145 Dennison Road  
Essex, CT 06426  
860/581-8554 FAX: 860/581-8543  
[www.rivercog.org](http://www.rivercog.org)

Chester, Clinton, Cromwell,  
Deep River, Durham, East Haddam,  
East Hampton, Essex, Haddam,  
Killingworth, Lyme, Middlefield  
Middletown, Old Lyme, Old Saybrook  
Portland, Westbrook

May 11, 2016

Mr. Gary Bousquet, Chairman  
Clinton Planning & Zoning Commission  
54 East Main Street  
Clinton, CT 06413

SUBJECT: CICD in the Marine Zone  
Petitioner: Cedar Island Marina

Dear Mr. Bousquet:

The Clinton Planning & Zoning Commission has submitted the subject petition for review for intermunicipal impacts and impacts to the ecosystem of Long Island Sound pursuant to Section 8-3b of the Connecticut General Statutes. This review is being provided to Commission for their consideration at the public hearing scheduled to commence on Monday, June 6, 2016.

#### Intermunicipal Impacts

Review of the petition indicates that, based upon the limited extent of the Marine Zone on the Clinton Harbor and Hammonasset River waterfront, intermunicipal impacts of “multi-family” residential development will not create any significant intermunicipal impacts to the RiverCOG towns of Westbrook and Killingworth as the Marine Zone is not located adjacent to those towns (the adjacent Town of Madison is located within the South Central Council of Governments area of operation).

#### Impacts to the Ecosystem of Long Island Sound

Based upon the submitted regulation proposal, it cannot be determined if there will be, or could possibly be, an adverse impact to the ecosystem of Long Island Sound were a development to be built anywhere within the Marine Zone. It is noted that the proposed regulations include provisions stating that “innovative stormwater/wastewater design” facilities may be required by the Commission if they are “determined to be feasible”. The question must be asked, what happens if such innovative facilities are *not* feasible? Will the water quality and coastal resources surrounding the properties and adjacent waterways, including Long Island Sound, be adequately protected?

Any provisions that the Planning & Zoning Commission can include in the proposed regulations that will insure minimal adverse impact to Long Island Sound and surrounding public waters should be considered. Such standards could include provisions requiring septic systems being installed as far from the waterways as is practical, given the circumstances of the property or properties on which such developments may be built. Other considerations should include provisions insuring that direct flow of lawn and parking lot runoff to adjacent waterways be minimized and redirected to properly designed drains and planted riparian buffers.

Finally, it is noted that Section 10.5.5, Requirements, does not include the need for Commission findings regarding specific protection of coastal resources or the adjacent waterways. Although such findings will be a part of any Coastal Site Plan Review conducted by the P&Z, these findings could also be a part of any zoning approval of this type of development when it is in close proximity to coastal resources and coastal waters.

Thank you for submitting the petition to the RiverCOG Regional Planning Committee for comment. If you have any questions about this report, please feel free to contact us at (860) 581-8551 or [tdownes@rivercog.org](mailto:tdownes@rivercog.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. H. Torrance Downes', with a long horizontal flourish extending to the right.

J. H. Torrance Downes  
Senior Planner, RiverCOG

Copy via email to:  
Carol Szymanski, DEEP/OLISP