



**City of Groton
Department of Planning & Economic Development**

Form B: Coastal Area Management

Refer to Section 5.2 CAM of the Zoning Regulations and CGS Sections 22a-90- through 22a-115

The CAM Boundary is depicted upon the Groton City Zoning Map

a. Coastal Resources Narrative

Provide a narrative describing all coastal resources as defined in C.G.S. Section 22a-93 with an accompanying site plan depicting the location of all resources.

The applicant is proposing to add parking to its existing Lot "B" at its Eastern Point Road campus. 74 parking space will be added to the former Colonel Ledyard school parcel. The property is within the 1,000 coastal area boundary however the lot is over 1,350 feet from the shore. The coastal resource adjacent to the site is Developed Shorefront. This category includes harbor areas that have been highly engineered and developed, such as the one located at the site. There will be no impacts to the shorefront as a result of this project as there several large buildings and Eastern Point Road between the shore and the proposed parking lot.

B. Assessment of Project Suitability: Capability of Resources to Accommodate the Proposed Use

1. Identify any and all coastal resource policies applicable to the proposed project as identified in C.G.S. Section 22a-92 (b) (2) and the *CT Coastal Management Manual*.

See attached

2. Identify any and all coastal use policies applicable to the proposed project as identified in C.G.S. Section 22a-92 (b) (1) and the *CT Coastal Management Manual*.

See attached

3. Describe how the proposed project is consistent with all of the coastal policies identified above (i.e., describe the extent to which the project complies or conflicts with each policy). Note: If a project conflicts with any policy, the project should be modified to reduce or eliminate the conflict.

See attached

c. Potential Beneficial and Adverse Impacts and Methods of Mitigation

1. Identify and describe the potential adverse impacts (as defined C.G.S. Section 22a-93 (15)) and potential beneficial impacts of the project on coastal resources.

See attached

ITEM 2 and 3 BELOW FOR WATERFRONT PROPERTY ONLY:

2. Is the project a water dependent use as defined in C.G.S. Section 22a-93 (16)? If so, explain why.

No, this property is not a water dependent use.

3. Describe the impacts or effects (either positive or negative) that the project will have on future water dependent uses or development on, and adjacent to this site. (Adverse impacts on future water dependent development opportunities are described in C.G.S. Section 22a-93 (17)).

There are no impacts of effects that this project will have on future water dependent uses.

4. Describe the proposed measures to mitigate (reduce or eliminate) any adverse impacts on coastal resources described in c.1 and, if applicable, on future water dependent developments opportunities described in c.3.

None

D. Demonstration of the Acceptability of Remaining or Unmitigated Adverse Impacts on Coastal Resources and Future Water Dependent Uses and Development

1. Describe any adverse impacts that remain after employing all reasonable mitigation measures.

None

2. Explain why these other remaining adverse impacts were not mitigated.

None

3. Explain why the Commission reviewing this application should find these remaining adverse impacts to be acceptable.

N/A

SUPPORTING MATERIALS/DOCUMENTATION

The Commission or Board may request the submission of such additional information that it deems necessary in order to reach a decision on the application. Include any additional information required by the Commission, and list any supplemental materials (plans, reports, etc.) that are being submitted in support of this application.

b. Assessment of Project Suitability: Capability of Resources to Accommodate the Proposed Use

1. Identify any and all coastal resource policies applicable to the proposed project as identified in C.G.S. Section 22a-92(b)(2) and the *CT Coastal Management Manual*.
2. Identify any and all coastal resource policies applicable to the proposed project as identified in C.G.S. Section 22a-92(b)(1) and the *CT Coastal Management Manual*.
3. Describe how the proposed project is consistent with all of the coastal policies identified above (i.e., describe the extent to which the project complies or conflicts with each policy). Note: if a project conflicts with any policy, the project should be modified to reduce or eliminate the conflict.

The Connecticut Coastal Management Act (CCMA) is codified in Chapter 444 of the Connecticut General Statutes (CGS), Sections 22a- 90 through 22a- 113. The Act defines coastal resources and boundaries and municipal and state obligations to protect coastal zones. The subsection most relevant to the compliance of a particular project with the Act is CGS 22a- 92: Legislative Goals and Policies. The following narrative lists the specific legislative goals and policies enumerated in CGS 22a-92, and specifies how the Electric Boat parking project complies with all relevant subsections.

22a-92(a) The following general goals and policies are established by this chapter:

- (1) To ensure that the development, preservation or use of the land and water resources of the coastal area proceeds in a manner consistent with the rights of private property owners and the capability of the land and water resources to support development, preservation or use without significantly disrupting either the natural environment or sound economic growth;

The project is compliant with this subsection of 22a-92. The area is historically developed, thereby limiting disruption to the natural environment and currently, supports a water-dependent use. The proposed project is to alleviate parking concerns.

- (2) To preserve and enhance coastal resources in accordance with the policies established by chapters 439, 440, 446i, 446k, 447, 474 and 477;

The project is compliant with this subsection of 22a-92. Specifically:

With regards to the policies of Chapter 239 as they relate to coastal resources, the proposed project avoids and minimizes impacts to air, land and water.

With regards to the policies of Chapter 440 as they relate to coastal resources, there are no tidal wetlands present on site or adjacent to the site where the parking lot project is being proposed, there will be no impacts to those coastal resources.

With regards to the policies of Chapter 446i as they relate to coastal resources and specifically water resources as stated in C.G.S. § 22a-366, the parking lot project will not require the diversion of water

as defined in C.G.S. § 22a-367(2) . Also, as designated in C.G.S. § 22a-380, the parking lot project will not alter, degrade or otherwise adversely affect water supply watersheds, surface water sources or groundwater sources as these are not located on or adjacent to the site.

With regards to the policies of Chapter 446k as they relate to coastal resources, existing or anticipated sources of pollution originating from the parking lot project will be managed in a manner consistent with C.G.S. § 22a-422 and associated waste water laws and regulation. Specifically, wastewater will not be managed on site.

With regards to the policies of Chapter 447 as they relate to coastal resources, there are no designated natural area preserves on or adjacent to the parking lot project site.

With regards to the policies of Chapter 474 as they relate to coastal resources, the parking lot project will not affect the adequate supply of pure (drinking) water or land necessary to protect an adequate supply of pure water. (C.G.S. § 25-37a) Specifically, the project site is located in a historically industrial area and is not nor has not been identified as a source or watershed to a source of pure water.

With regards to the policies of Chapter 477 as they relate to coastal resources, the parking lot project is not located in federally-designated flood zones, it is not an area on or near shores or beaches that has been or is subject to construction of protective works designed to prevent loss of life, property and revenue to municipalities and the state from taxation. (C.G.S. § 25-69).

(3) To give high priority and preference to uses and facilities which are dependent upon proximity to the water or the shorelands immediately adjacent to marine and tidal waters;

The project is compliant with this subsection of 22a-92 as the project supports Electric Boat's water dependent use.

(4) To resolve conflicts between competing uses on the shorelands adjacent to marine and tidal waters by giving preference to uses that minimize adverse impacts on natural coastal resources while providing long term and stable economic benefits;

The project is compliant with this subsection of 22a-92. There are minimal natural resources affected in this shoreland and the project provides long term economic benefits to area and the State of Connecticut by increasing the number of high-skill, high-paying jobs that will last for decades.

(5) To consider in the planning process the potential impact of a rise in sea level, coastal flooding and erosion patterns on coastal development so as to minimize damage to and destruction of life and property and minimize the necessity of public expenditure and shoreline armoring to protect future new development from such hazards;

This subsection of 22a-92 is not applicable as this project is over 1,350 ft. away from the shore and will have no impact on the items noted above.

(6) To encourage public access to the waters of Long Island Sound by expansion, development and effective utilization of state– owned recreational facilities within the coastal area that are consistent with sound resource conservation procedures and constitutionally protected rights of private property owners;

This subsection of 22a-92 is not applicable to this project. The land is not state owned and an existing security zone that prohibits public navigation near Electric Boat facilities (see 33 C.F.R. §§ 165.30, 165.33, 165.154).

(7) To conduct, sponsor and assist research in coastal matters to improve the data base upon which coastal land and water use decisions are made;

This subsection of 22a-92 is not applicable to this project. The proposed project is not a research-related project.

(8) To coordinate the activities of public agencies to ensure that state expenditures enhance development while affording maximum protection to natural coastal resources and processes in a manner consistent with the state plan for conservation and development adopted pursuant to part I of chapter 297;

The project is compliant with this subsection of 22a-92. The project complies with the State Plan of Conservation and Development.

(9) To coordinate planning and regulatory activities of public agencies at all levels of government to ensure maximum protection of coastal resources while minimizing conflicts and disruption of economic development; and

The project is not applicable with this subsection of 22a-92. The proposed project is over 1,350 ft. from the shore and will no impacts to the already highly developed area.

(10) To ensure that the state and the coastal municipalities provide adequate planning for facilities and resources which are in the national interest as defined in section 22a– 93 and to ensure that any restrictions or exclusions of such facilities or uses are reasonable. Reasonable grounds for the restriction or exclusion of a facility or use in the national interest shall include a finding that such a facility or use: (A) May reasonably be sited outside the coastal boundary; (B) fails to meet any applicable federal and state environmental, health or safety standard or (C) unreasonably restricts physical or visual access to coastal waters. This policy does not exempt any nonfederal facility in use from any applicable state or local regulatory or permit program nor does it exempt any federal facility or use from the federal consistency requirements of Section 307 of the federal Coastal Zone Management Act.

This subsection of 22a-92 is not applicable to this project. The project does not meet the definition of “Facilities and resources which are in the national interest” as defined by CGS 22a 93(14). However, the project does support the national interest in that it is one of only two locations at which submarines can be manufactured in the country, it may not be sited outside the coastal boundary, it meets all applicable federal and state environmental, health and safety standards, and it does not unreasonable restrict physical or visual access to coastal waters.

(b) In addition to the policies stated in subsection (a) of this section, the following policies are established for federal, state and municipal agencies in carrying out their responsibilities under this chapter:

(1) Policies concerning development, facilities and uses within the coastal boundary are:

(A) To manage uses in the coastal boundary through existing municipal planning, zoning and other local regulatory authorities and through existing state structures, dredging, wetlands, and other state siting and regulatory authorities, giving highest priority and preference to water– dependent uses and facilities in shoreline areas;

The project is compliant with this subsection of 22a-92. Project will be subject to local and regulatory review.

(B) to locate and phase sewer and water lines so as to encourage concentrated development in areas which are suitable for development; and to disapprove extension of sewer and water services into developed and undeveloped beaches, barrier beaches and tidal wetlands except that, when necessary to abate existing sources of pollution, sewers that will accommodate existing uses with limited excess capacity may be used;

This subsection of 22a-92 is not applicable to this project. The project is not utility related.

(C) to promote, through existing state and local planning, development, promotional and regulatory authorities, the development, reuse or redevelopment of existing urban and commercial fishing ports giving highest priority and preference to water dependent uses, including but not limited to commercial and recreational fishing and boating uses; to disallow uses which unreasonably congest navigation channels, or unreasonably preclude boating support facilities elsewhere in a port or harbor; and to minimize the risk of oil and chemical spills at port facilities;

This subsection of 22a-92 is not applicable to this project as it is over 1,350 ft. from the shore and will have no impact on the navigational channel.

(D) to require that structures in tidal wetlands and coastal waters be designed, constructed and maintained to minimize adverse impacts on coastal resources, circulation and sedimentation patterns, water quality, and flooding and erosion, to reduce to the maximum extent practicable the use of fill, and to reduce conflicts with the riparian rights of adjacent landowners;

This subsection of 22a-92 is not applicable to this project as it is over 1,350 ft. from the shore and will have no impacts on the coastal resources.

(E) to disallow the siting within the coastal boundary of new tank farms and other new fuel and chemical storage facilities which can reasonably be located inland and to require any new storage tanks which must be located within the coastal boundary to abut existing storage tanks or to be located in urban industrial areas and to be adequately protected against floods and spills;

This subsection of 22a-92 is not applicable to this project. The project is not a tank farm.

(F) to make use of rehabilitation, upgrading and improvement of existing transportation facilities as the primary means of meeting transportation needs in the coastal area;

This subsection of 22a-92 is not applicable to this project. The project is not a transportation facility.

(G) to encourage increased recreational boating use of coastal waters, where feasible, by (i) providing additional berthing space in existing harbors, (ii) limiting non- water- dependent land uses that preclude boating support facilities, (iii) increasing state- owned launching facilities, and (iv) providing for new boating facilities in natural harbors, new protected water areas and in areas dredged from dry land;

This subsection of 22a-92 is not applicable to this project. The project does not include or effect recreational boating use.

(H) to protect coastal resources by requiring, where feasible, that such boating uses and facilities (i) minimize disruption or degradation of natural coastal resources, (ii) utilize existing altered, developed or redevelopment areas, (iii) are located to assure optimal distribution of state- owned facilities to the state- wide boating public and (iv) utilize ramps and dry storage rather than slips in environmentally sensitive areas;

This subsection of 22a-92 is not applicable to this project. The project does not include or effect recreational boating use.

(I) to protect and where feasible, upgrade facilities serving the commercial fishing and recreational boating industries; to maintain existing authorized commercial fishing and recreational boating harbor space unless the demand for these facilities no longer exists or adequate space has been provided; to design and locate, where feasible, proposed recreational boating facilities in a manner which does not interfere with the needs of the commercial fishing industry; and

The project is compliant with this subsection of 22a-92. The project will not conflict with commercial fishing or recreational industries.

(J) to require reasonable mitigation measures where development would adversely impact historical, archaeological, or paleontological resources that have been designated by the state historic preservation officer.

The project is compliant with this subsection of 22a-92. There is little to no potential for intact archaeological deposits or significant underwater cultural resources to occur in the project area.

(K) to encourage the cooperative use of confined aquatic disposal cells for dredged material in appropriate circumstances.

The project is not applicable with this subsection of 22a-92.

(2) Policies concerning coastal land and water resources within the coastal boundary are:

(A) to manage coastal bluffs and escarpments so as to preserve their slope and toe; to discourage uses which do not permit continued natural rates of erosion and to disapprove uses that accelerate slope erosion and alter essential patterns and supply of sediments to the littoral transport system;

This subsection of 22a-92 is not applicable to this project. Coastal bluffs are not present at the project site.

(B) to manage rocky shorefronts so as to ensure that development proceeds in a manner which does not irreparably reduce the capability of the system to support a healthy intertidal biological community; to provide feeding grounds and refuge for shorebirds and finfish, and to dissipate and absorb storm and wave energies;

The project is compliant with this subsection of 22a-92. Rocky shorefront will not be impacted by the project. The project is over 1,350 feet from the shore.

(C) to preserve the dynamic form and integrity of natural beach systems in order to provide critical wildlife habitats, a reservoir for sand supply, a buffer for coastal flooding and erosion, and valuable recreational opportunities; to ensure that coastal uses are compatible with the capabilities of the system and do not unreasonably interfere with natural processes of erosion and sedimentation, and to encourage the restoration and enhancement of disturbed or modified beach systems;

This subsection of 22a-92 is not applicable to this project. No natural beach systems are present at the project site.

(D) to manage intertidal flats so as to preserve their value as a nutrient source and reservoir, a healthy shellfish habitat and a valuable feeding area for invertebrates, fish and shorebirds; to encourage the restoration and enhancement of degraded intertidal flats; to allow coastal uses that minimize change in the natural current flows, depth, slope, sedimentation, and nutrient storage functions and to disallow uses that substantially accelerate erosion or lead to significant despoliation of tidal flats;

This subsection of 22a-92 is not applicable to this project. No intertidal flats are present at the project site.

(E) to preserve tidal wetlands and to prevent the despoliation and destruction thereof in order to maintain their vital natural functions; to encourage the rehabilitation and restoration of degraded tidal wetlands and where feasible and environmentally acceptable, to encourage the creation of wetlands for the purposes of shellfish and finfish management, habitat creation and dredge spoil disposal;

This subsection of 22a-92 is not applicable to this project. No tidal wetlands present at the project site.

(F) to manage coastal hazard areas so as to ensure that development proceeds in such a manner that hazards to life and property are minimized and to promote nonstructural solutions to flood and erosion problems except in those instances where structural alternatives prove unavoidable and necessary to protect commercial and residential structures and substantial appurtenances that are attached or integral thereto, constructed as of January 1, 1995, infrastructural facilities or water dependent uses;

This subsection of 22a-92 is not applicable to this project. This is a parking lot project that is over 1,350 feet from the shore. There are not structures proposed.

(G) to promote, through existing state and local planning, development, promotional and regulatory programs, the use of existing developed shorefront areas for marine– related uses, including but not limited to, commercial and recreational fishing, boating and other water– dependent commercial, industrial and recreational uses;

This subsection of 22a-92 is not applicable to this project. This is a parking lot project that is over 1,350 feet from the shore. There will be no changes to existing industrial uses.

(H) to manage undeveloped islands in order to promote their use as critical habitats for those bird, plant and animal species which are indigenous to such islands or which are increasingly rare on the mainland; to maintain the value of undeveloped islands as a major source of recreational open space; and to disallow uses which will have significant adverse impacts on islands or their resource components;

This subsection of 22a-92 is not applicable to this project. No islands present at the project site

(I) to regulate shoreland use and development in a manner which minimizes adverse impacts upon adjacent coastal systems and resources;

The project is compliant with this subsection of 22a-92. There will be no changes to the adjacent coastal system and resources.

(J) and to maintain the natural relationship between eroding and depositional coastal landforms and to minimize the adverse impacts of erosion and sedimentation on coastal land uses through the promotion of nonstructural mitigation measures. Structural solutions are permissible when necessary and unavoidable for the protection of infrastructural facilities, cemetery or burial grounds, water-dependent uses, or commercial and residential structures and substantial appurtenances that are attached or integral thereto, constructed as of January 1, 1995, and where there is no feasible, less environmentally damaging alternative and where all reasonable mitigation measures and techniques have been provided to minimize adverse environmental impacts.

This subsection of 22a-92 is not applicable to this project. This is a parking lot project that is over 1,350 feet from the shore. There are not structures proposed.

This subsection of 22a-92 is not applicable to this project. The project does not include state-owned recreation facilities.

(K) to require as a condition in permitting new coastal structures, including but not limited to, groins, jetties or breakwaters, that access to, or along, the public beach below mean high water must not be unreasonably impaired by such structures and to encourage the removal of illegal structures below mean high water which unreasonably obstruct passage along the public beach;

This subsection of 22a-92 is not applicable to this project. The project site does not include a public beach and public access via the upland to the shoreline is already prohibited due to security requirements at Electric Boat. Similarly, the public cannot access the shoreline from the water at the Electric Boat property due to the existing security zone.

c. Potential Beneficial and Adverse Impacts and Methods of Mitigation

1. Identify and describe the potential adverse impacts (as defined in C.G.S. Section 22a-93(15)) and potential beneficial impacts of the project on coastal resources.

The following narrative lists the specific legislative goals and policies enumerated in CGS 22a-93(15, 16, & 17)

22a-93(15) " "Adverse impacts on coastal resources" include but are not limited to:

(A) Degrading water quality through the significant introduction into either coastal waters or groundwater supplies of suspended solids, nutrients, toxics, heavy metals or pathogens, or through the significant alteration of temperature, pH, dissolved oxygen or salinity;

The project is compliant with this subsection of 22a-93. The project will not result in the significant introduction of suspended solids, nutrients, toxics, heavy metals or pathogens into coastal waters or groundwater supplies. Likewise, the project will not significantly alter the temperature, pH, dissolved oxygen or salinity of coastal waters or groundwater supplies. Stormwater management improvements at the site will assure that there is no degradation of water quality due to the project.

(B) degrading existing circulation patterns of coastal waters through the significant alteration of patterns of tidal exchange or flushing rates, freshwater input, or existing basin characteristics and channel contours;

The project is compliant with this subsection of 22a-93. Existing circulation patterns in the Thames River will not be impacted by the project.

(C) degrading natural erosion patterns through the significant alteration of littoral transport of sediments in terms of deposition or source reduction;

The project is compliant with this subsection of 22a-93. This project is over 1,350 feet away from the shore and will have no impact on the coastal resources.

(D) degrading natural or existing drainage patterns through the significant alteration of groundwater flow and recharge and volume of runoff;

The project is compliant with this subsection of 22a-93. There will be minimal impacts on drainage patterns and no alterations to groundwater flow or recharge.

(E) increasing the hazard of coastal flooding through significant alteration of shoreline configurations or bathymetry, particularly within high velocity flood zones;

The project is compliant with this subsection of 22a-93. This project will have no impact on coastal flooding as it over 1,350 feet away from the shore and there will be no alterations of shoreline configurations.

(F) degrading visual quality through significant alteration of the natural features of vistas and view points;

The project is compliant with this subsection of 22a-93. There are no structures associated with this project. Previously there was a school at this locations which was removed in 2018. Existing views from the nearby residents will be maintained.

(G) degrading or destroying essential wildlife, finfish or shellfish habitat through significant alteration of the composition, migration patterns, distribution, breeding or other population characteristics of the natural species or significant alteration of the natural components of the habitat; and

The project is compliant with subsection of 22a-93. This project will have no impact on coastal resources.

(H) degrading tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments through significant alteration of their natural characteristics or function;

This subsection of 22a-93 is not applicable to this project. No tidal wetlands, beaches and dunes, rocky shorefronts, and bluffs and escarpments are present at the project site.