

**State of Connecticut
Office of Policy & Management**

DRAFT
**Conservation and Development Policies Plan 2013-2108:
Response to Public Comments**

OVERVIEW

The Draft 2013-2018 Conservation and Development Policies Plan (Plan) was published on April 30, 2012. OPM, in cooperation with regional planning organizations, (RPOs) conducted thirteen public hearings over the ensuing five-month period. Public comments were accepted through October 5, 2012, at which time OPM committed to publish a draft response document in early November.

Due to the unprecedented number of comments received by OPM on both the Plan text and the draft Locational Guide Map (Map), OPM ultimately needed an additional month to meet its commitment. The draft response document should be considered a good-faith effort by OPM to explain its rationale for the Plan's content. Please understand that the task of summarizing what were oftentimes lengthy comments into a few words was a challenge in and of itself and, unfortunately, some loss in articulation was inevitable.

Responses to comments have been batched by: 1) Municipalities and RPOs; 2) Public/Individuals; 3) Statewide Organizations; 4) Local and Regional Interest Groups; 5) Legislators; and 6) State Agencies/Councils, and a separate document summarizes all the specific Map comments and associated data that was submitted to OPM in various formats.

Given the amount of time needed to address these comments and the evolving nature of this exercise, OPM anticipates that there will be some instances where it may be necessary to modify certain responses to comments to account for unforeseen conflicts, as it makes the recommended revisions to the Plan before submitting it to the Continuing Legislative Committee on State Planning and Development (Continuing Committee) later this month.

Please note that the Continuing Committee is required to hold a legislative public hearing on the Plan within 45 days of the start of the 2013 session, so interested parties will have another opportunity to offer comments before the Committee makes its recommendation to the General Assembly for its consideration of approval.

Capitol Region Council Of Governments

Municipality:

Contact(s): Mary Ellen Kowalewski

Nature of Comments:

Plan is generally consistent with the Regional Plan. The clarification of the role of the LGM as the secondary factor in decision making is an approach with which they agree. The flexibility of the exception process associated with PFA requirements should result in more rational decisions.

OPM Response:

No response necessary.

Municipality: Andover

Contact(s): Robert Burbank, Susan England, Michael Palazzi

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Avon

Contact(s): Brandon Robertson, Steve Kushner

Nature of Comments:

1.) Provided map related comments on specific areas. 2.) Requested a specific policy be included in the text, possibly under GMP #4 that would support use of sewers for development designs/forms (such as open space/conservation subdivisions) that are superior to conventional development in conservation areas.

OPM Response:

1.) Addressed in map details document 2.) OPM intends to address this through either the addition to, or modification of, the Plan's policies.

Municipality: Bolton
Contact(s): Bob Morra

Nature of Comments:
Provided map related comments on specific areas

OPM Response:
Addressed in the map details document

Municipality: Canton
Contact(s): Neil Pade

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: East Windsor
Contact(s): Laurie Whitten

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in map details document

Municipality: Granby

Contact(s): Fran Armentano

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Hebron

Contact(s): Mike O'Leary

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Manchester
Contact(s): Mark Pellegrini

Nature of Comments:

Manchester did not find any policies in the plan text or designations on the locational guide map to be in conflict with their municipal plan

OPM Response:

No response necessary

Municipality: Marlborough
Contact(s): Peter Hughes

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Newington
Contact(s): Craig Minor

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Simsbury
Contact(s): Hiram Peck

Nature of Comments:

1.) Provided map related comments on specific areas. 2.) Provided local POCD, 2009 Charette Plan and Form based codes.

OPM Response:

1.) Addressed in the map details document 2.) No response necessary

Municipality: South Windsor
Contact(s): Michelle Lipe

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Suffield
Contact(s): Bill Hawkins

Nature of Comments:
Provided map related comments on specific areas

OPM Response:
Addressed in the map details document

Municipality: Tolland

Contact(s): Linda Farmer, Steve Lowrey

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Vernon

Contact(s): Len Tundermann

Nature of Comments:

1.) Found Vernon's POCD to be largely consistent with the plan's policies and growth management principles where applicable. 2.) Provided map related comments on specific areas

OPM Response:

1.) No response necessary

Municipality: Wethersfield
Contact(s): Denise Bradley

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Windsor
Contact(s): Eric Barz

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Central CT regional Planning Agency

Contact(s): Kristin Thomas

Nature of Comments:

1.) Undeveloped land contiguous to open space should be included in Priority Conservation Areas. 2.) Text fails to mention preserving scenic or recreational resources. 3.) Use the term "Downtown" or "Town Center" rather than the broad term of Urban Area. Civic and government activities should be promoted in urban centers. 4.) Criteria for PDA should include downtowns, town centers, transit hubs. 5.) Higher priority should be placed on areas meeting multiple criteria for PDA designation. 6.) State agencies should give preferential treatment to sites that meet multiple criteria when determining consistency with the plan. 7.) There are many errors and omissions in the Open Space data. 8.) Clarify the term "planned" sewer or water service to ensure that there is a viable plan in place for those utilities. 9.) Exclude lakeside areas from PDA/BGA's. 10.) The use of census blocks creates scenarios where lakes are included in PDA's. 11.) Consider using 250 acre blocks of undeveloped land, or eliminate holes in PCA's resulting from forest clearing.

OPM Response:

1.) The revised Draft Plan will clarify that priority funding areas only pertain to "growth-related projects" as defined in CGS Sec. 16a-35c. This issue will be addressed in the first bullet in GMP 4, which will be modified to reference "other priorities identified in the State's Open Space Plan (i.e., Green Plan)". Pages 6 & 8 of that plan address contiguous lands. 2.) Scenic values are a component of the glossary definition of "natural areas" as used in GMP 4, and a new GMP 4 policy will state "Protect the ecological, scenic and recreational values of lakes, rivers and streams by promoting compatible land uses and management practices in the vicinity of these resources". 3.) OPM will consider incorporating either the term "Downtown" or "Town Center" into the text of the plan. 4.) OPM is concerned that there is not sufficient Statewide data available depicting "Downtowns" or "Town Centers" on the Map. Many transit based criteria are already used in the designation of PDA's. 5&6.) Due to past concerns about the Plan being too top-down, this Plan revision recommends that priority funding areas be based on a broad Census Block basis, in order to allow the possibility that future coordination among municipalities and regional planning organizations will result in the identification of the highest priority areas for targeting state funding. 7.) OPM is aware of the issues regarding Open Space data and is accepting improved data when available. 8.) The term refers to either an existing Water Pollution Control Facilities Plan or a Public Drinking Water Supply Plan. OPM will clarify this. 9.) OPM disagrees with this comment as many of these areas may require infrastructure improvements which may be categorized as a "Growth Related Project" in order to improve water quality. However, OPM would remove the designation for any Census Block at the request of the affected municipality, although this might necessitate a PFA exception process under CGS Sec. 16a-35d in the future. 10.) OPM is aware of this issue and will eliminate those areas from PDA designations. 11.) OPM will try to eliminate those holes in the next LGM.

Municipality: Plainville
Contact(s): Mark DeVoe

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Council of Governments Central Naugatuck Valley

Contact(s): Peter Dorpalen, Virginia Mason, Glenda Prentiss, Sam Gold

Nature of Comments:

1) Concern about the use of census blocks. The use of census blocks over-represents sewer and water service areas and makes the plan heavily pro-development. Towns should be able to divide the census block mapping units. 2) The term balanced growth implies pro-growth and a single shade of yellow for balanced growth implies development and conservation factors are equal. A more neutral term, not including the word "growth", should be used. 3) Actions listed as exempt on p. 27 should be clearly defined or connected to an appropriate reference, such as in CEPA law. 4) Several policies in GMP 5 are oriented more to development than conservation. 5) Smaller preservation areas of wetlands and forests have been eliminated. 6) Is there still a numeric state open space goal? 7) There are discrepancies between COGCNV's and the LGM's definition of preserved open space. The term "protected open space and farmland" is confusing because some people believe P.A. 490 is included. Are Class I & II water company lands included as protected open space? 8) Provided map related comments on specific areas. 9) Southbury would like Southbury Training School lands to continue in agriculture, not development. 10) Being next to already preserved lands should be considered a conservation factor. 11) If DEEP wants to acquire land, must it go to OPM and the POCD? 12) How long will the exception process take and will a property owner be able to go straight to the state? 13) The POCD should encourage development without sewers. Will the state DEEP sewer service plan be arbiter of where systems will go in? 14) "Active agricultural land" should be a conservation factor, as it was considered in 2005. 15) Small, undesignated areas surrounded by large forests should also be considered forest, to avoid creating additional border forest. 16) Development factors are attributed to watershed land in Prospect because of sewer service in Naugatuck. 17) There should be a non-preserved open space category to help in identifying them for possible preservation 18) Provided map related comments on specific areas in Glenda Prentice email to DM; Sam Gold email to DM).

OPM Response:

1) Due to past issues with the Map concerning the accuracy of utility service area boundaries and the resulting requests for interim changes, OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries using Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans or zoning. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. See related response to HVCEO comment #3. 2) OPM recommends changing the term to Balanced Priority Funding Area with additional explanation on its application. 3) The listed actions are exempt from Map review because they do not meet the definition of growth related project under CGS Sec. 16a-35c. New language in the Map chapter will explain the application of the Plan and Map, including CEPA applicability. 4) This is in recognition of the fact that the state does not control land uses in many critical resource areas, and there is the need to ensure that such areas are appropriately managed to ensure their long-term functional integrity. 5) Although the state has established various minimum acreage thresholds for certain resources, nothing precludes a municipality from requesting factors such as smaller wetlands and forested areas be included on the Map as local conservation priorities. 6) Connecticut's goal of preserving 21% of its land is still in effect. 7) OPM is refining this data layer to correct errors and to accept new/updated information from municipalities and RPOs to improve its accuracy. PA 490 lands are not considered "protected", but a municipality could request such lands be considered a local conservation priority. Also, see response to CT Water Company comment #10 in "Local & Regional

Interest Groups" comment document. 8) Map-related comments noted. 9) Comment noted. See response to Southbury comment #1. 10) This goal is indicated in the current Green Plan (p. 6 & 8), and the first bullet in GMP 4 will be modified to reference "other priorities identified in the State's Open Space Plan (i.e., Green Plan)". 11) The process for DEEP to preserve open space does not change, since it is not considered a "growth-related project" under CGS Sec. 16a-35c. 12) Details associated with implementing the PFA exception process have not been determined beyond the requirements specified in CGS Section 16a-35d. 13) Both the last paragraph in the GMP 4 introduction and the policy that begins "Rely upon the capacity of the land" address this issue. DEEP works with municipalities determining sewer service area boundaries, which define the extent of existing and planned sewer service. 14) OPM is not aware of a statewide data source depicting active agricultural land, but would consider it a local conservation priority upon request of a municipality. 15) OPM will try to address this issue when it revises the Map. 16) OPM may need more information to address this comment. 17) DEEP's Green Plan guides acquisition and preservation of land. 18) So noted.

Municipality: Beacon Falls

Contact(s): Gerald Smith, Rich Minnock

Nature of Comments:

1) Concern about the use of census blocks. 2) The LGM shows development area islands surrounded by balanced growth. The islands were clearings in forests and they shouldn't be priority development areas. 3) Provided map related comments on specific areas - the town's sewer service map shows areas where development is to be encouraged and areas where development is to be discouraged and the LGM should be consistent with that. (Glenda Prentice email to DM).

OPM Response:

1) See response to COGCNV comment #1. 2) OPM will try to address this issue when it revises the Map. 3) Addressed in the map details document.

Municipality: Bethlehem
Contact(s): Jean Donegan

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document.

Municipality: Cheshire

Contact(s): William Voelker

Nature of Comments:

Provided map related comments on specific areas - potential, depending on outcome of WPCA review.

OPM Response:

so noted

Municipality: Middlebury
Contact(s): Brian Miller

Nature of Comments:

1) Concern about the use of census blocks - census blocks fail to adequately represent small towns, so certain areas lack continuity. 2) Provided map related comments on specific areas.

OPM Response:

1) See response to COGCNV comment #1. 2) Addressed in the map details document.

Municipality: Prospect

Contact(s): Gil Graveline, Bill Donovan

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Southbury

Contact(s): Edward Gore, Jr., DeLoris Curtis

Nature of Comments:

1) The town is concerned about not knowing what the state might do with Southbury Training School land. The town doesn't want it to be priority development.

OPM Response:

1) Addressed in the map details document.

Municipality: Watertown
Contact(s): Ruth Mulcahy

Nature of Comments:

Provided map related comments on specific areas.

OPM Response:

Addressed in the map details document

Greater Bridgeport Regional Council

Contact(s): Brian Bidolli

Nature of Comments:

1) It would be helpful as the plan goes forward to have a discussion with towns to quantify the implementation of plan goals, such as an ongoing monitoring process rather than every 10 years. 2) Encourage OPM to work closely with DOT in developing an effective transit-oriented development strategy.

OPM Response:

1) While there is no such requirement in state statute, OPM is willing to consider a type of ongoing cross-acceptance process whereby regional planning organizations, at their option, host periodic forums at which OPM and/or other state agencies can discuss any particular issues of interest to the member towns in the region. 2) The state policies with regard to transit-oriented development are currently evolving.

Municipality: Bridgeport

Contact(s): Anne Pappas Phillips

Nature of Comments:

1) Are census blocks synonymous with density? 2) What is the composition of the legislative committee responsible for overseeing the Plan adoption process?

OPM Response:

1) Census Blocks are the smallest geographical unit used by the US Census Bureau for tabulating data on all households. Census Blocks vary greatly in their geographic area and population, so one could infer that smaller Census Blocks would likely have a higher density than a larger Census Block. 2) The Continuing Legislative Committee on State Planning and Development was created under CGS Sec. 4-60d.

Municipality: Easton

Contact(s): Wallace Williams

Nature of Comments:

1) How does OPM intend to continue the bottom-up process from this point forward? 2) Is the objective of the Plan to mirror the municipal plans or will there be differences between local and state plans?

OPM Response:

1) OPM has undertaken a more bottom-up approach from the beginning of the process, as outlined in its cross-acceptance report. OPM had numerous meetings and public hearings to seek comments from state agencies, RPOs, municipalities and interested groups and citizens; Also, see related response to Housatonic Valley Council of Elected Officials comment #3. 2) The objective of the Plan is to ensure that state agencies have a broad policy context within which to develop their own plans and to undertake certain actions involving the purchase, acquisition or improvement of real property, transportation equipment and facilities, or any grants for such purposes. State statutes do not require conformity between the state and municipal plans, so differences are expected; however, any state agency-proposed project using state or federal funds must be consistent with the Plan. OPM is hopeful that the broad Census Block approach it took to delineating the initial boundaries of priority funding areas will encourage municipalities and regional planning organizations to coordinate on identifying the highest priority areas for targeting future state funding.

Municipality:

Contact(s): Ira Bloom

Nature of Comments:

1) Concerned about omission of a standard for development on public water supply watershed areas. The 2005-2010 plan had a specific recommendation of one dwelling unit for every two buildable acres within public water supply watershed areas, but that is no longer included.

OPM Response:

1) See response to Council on Environmental Quality comment #7 in "State Agencies" comment document.

Municipality: Monroe
Contact(s): Dave Killeen

Nature of Comments:

- 1) How should municipalities address the Map's discrepancies/inconsistencies with local land use plans?
- 2) For state proposed actions in balanced growth areas, how would the funding agency determine consistency with the Plan?
- 3) How does the chart in Attachment A relate to GMPs, and do the colors represent different levels of intensity?

OPM Response:

- 1) OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries, which uses Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. OPM has provided an online tool to assist municipalities in this effort.
- 2) In the case of a proposed growth-related project in a balanced growth area, the sponsoring agency would need to document how any conservation values might be avoided, minimized or mitigated. Certain actions may also be subject to the requirements of the CT Environmental Policy Act. More examples on how to apply the Map will be included in the revised Plan.
- 3) This chart provides examples of state agency administered programs and serves as a general guide for agency staff to locate relevant policies for consideration when determining the project's consistency. The chosen colors do not represent levels of intensity or have any other significance.

Municipality: Stratford
Contact(s): Mary Young

Nature of Comments:

1) Suggest that there should be improved methodology for coordinating with towns' land use maps to avoid disconnects. 2) What is the composition of the legislative committee having oversight of the Plan? 3) Is there an appeal/amendment process for the Plan after its adoption, and does an interim change request come from the municipality?

OPM Response:

1) OPM facilitated a Plan Comparison process in Jan.-Apr. 2012 prior to publishing the draft Plan in April 2012, and municipalities and RPOs were provided an additional five months during this public review period to provide supplemental comments. 2) The Continuing Legislative Committee on State Planning and Development was created under CGS Sec. 4-60d. 3) The interim change process is outlined in CGS Sec. 16a-32b. Whenever the Continuing Committee approves an interim change, this constitutes a formal amendment of the legislatively adopted Plan.

Housatonic Valley Council of Elected Officials**Contact(s):** Jonathan Chew, Dave Hannon**Nature of Comments:**

1) Specific map related comments for various towns. 2) The map criteria for Priority Development Areas include lands that fall within "Urban Areas" as defined by the US Census. The inclusion of this criterion means that extensive low density suburban areas, with no public sewer and water infrastructure existing or planned, are defined for Priority Development. 3) The fundamental issue is that it does not serve the "anti-sprawl" recentralizing goals of the Plan to empower the 2010 Census Urban Area map by inclusion in its entirety. The Urban Area map is unfortunately far too geographically broad and should be removed as a criterion.

OPM Response:

1) OPM will incorporate the HART bus routes, the Georgetown Rail Station, and Village Centers provided by HVCEO. In addition OPM accepts all comments related the the inclusion or exclusion of certain drinking water supply watershed. 2) See response to CT Conference of Municipalities comment #1 in "Statewide Organizations" comment document. 3) OPM has recommended fairly broad criteria for delineating initial boundaries of priority funding, recognizing that there will be a need for these boundaries to be refined according to local and regional priorities. OPM encourages municipalities to fully utilize their statutory authority to designate local priority funding areas (CGS Sec. 8-23(f)(7)) and for each RPO to plan and negotiate with its member municipalities to identify regional priority funding areas when the regional plan of conservation and development is updated, as a means to developing a more integrated planning process in CT.

Municipality: Bethel

Contact(s): Steve Palmer, Beth Cavagna

Nature of Comments:

1) Map related comments. 2) concern that with the LGM there should be some type of educational component with state agencies-- so easy to open up a plan and go to a map-- there will have to be a lot of education of agencies to have them go to the plan and not just go to the map

OPM Response:

1) Addressed in the map details document 2) OPM is working with affected agencies to ensure that their determinations of consistency are done uniformly, and that advisory statements under CGS Sec. 16a-31(b) are requested whenever a proposed agency action is outside the routine.

Municipality: Brookfield

Contact(s): Katherine Daniel

Nature of Comments:

1) Public water service and public bus service factors were not included in the central commercial corridor that runs along Rt. 202. 2) Urban Area - is too broad to be useful in focusing state funding efforts. 3) Request that the Four Corners area be shown as a higher priority for development than the surrounding area.

OPM Response:

1) So noted and have been added. 2) See response to CT Conference of Municipalities comment #1 in "Statewide Organizations" comment document. 3) At this time, the Map is not intended to reflect different levels of priorities. See related response to HVCEO comment #3.

Municipality: New Milford
Contact(s): Patricia Murphy

Nature of Comments:

1) Map related comments

OPM Response:

Addressed in the map details document

Municipality: Newtown
Contact(s): Scott Sharlow

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in the map details document

Municipality: Redding

Contact(s): JoAnn Brooks

Nature of Comments:

1) Agree with CFE that the plan does not provide the kind of concrete steps and enforceable requirements that will really protect watershed lands. More detailed policies should be added to the Plan.

OPM Response:

1) See response to Council on Environmental Quality comment #7 in "State Agencies" comment document.

Litchfield Hills Council of Elected Officials

Contact(s): Rick Lynn

Nature of Comments:

1) Concern about the use of Census Blocks and Urbanized Areas, especially in rural municipalities. Suggest that boundaries for priority development areas conform to existing or planned sewer service areas in rural municipalities. 2) OPM should use the Litchfield Hills Greenprint mapping, which provides more accurate open space data. 3) The LGM should show Norfolk, Litchfield and Bantam Center as Village Growth Areas and boundaries should be refined in accordance with municipal input. 4) Goshen's village area should be expanded to include town hall/school area. 5) The criteria for priority conservation areas are too limited and should also include factors such as whether land is in proximity to other preserved lands and other resource areas. If they are too detailed to show on the map, they should be mentioned in the text of the plan. 6) Town borders and state roads should be included on the LGM base map and water bodies should be shown as blue. The LGM currently shows Highland Lake as a balanced growth area. 7) The LGM should include a statement that it is to be used for secondary consideration, that it is generalized, and does not include small features. 8) The map associated with the 2005-2010 Plan worked better for our towns, with a regional center in Torrington, sub regional centers in Winsted and New Hartford, surrounded by rural communities largely without sewers but with important rural community centers where village-scale development is encouraged. That map also showed the region's value in providing public drinking water for metropolitan regions. 9) The previous Plan's support for 2-acre density in public water supply watersheds was helpful when reviewing development and rezoning proposals in such areas. One solution to that concern is to incorporate by reference the documents "Protecting Connecticut's Water Supply Watersheds", "The CT Stormwater Quality Manual" and "CT Guidelines to Soil Erosion and Sediment Control". 10) Provided map related comments on specific areas.

OPM Response:

1) OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries, which uses Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. State agencies and other interested parties will be able to access specific data layers, such as sewer service area, when determining the consistency of their actions with the Plan (see response to Dept. of Economic and Community Development comment #1). 2) so noted. 3) so noted. 4) so noted. 5) OPM is allowing municipalities to add local conservation priorities. Also, the GMP 4 policy that begins "Protect and preserve natural areas..." will be modified to include reference to a number of the examples of conservation factors cited in the written comments. 6) OPM will seek to make improvements in the near future, and address other anomalies such as the lake issue. 7) See response to CT Chapter of the American Planning Association comment #6. 8) As discussed in the Map chapter, new statutory requirements for Priority Funding Areas (CGS Chapter 297a), since the 2005-2010 Plan was adopted, required a fundamental change in the role of the Map. 9) See response to Council on Environmental Quality comment #7. 10) so noted.

Municipality: Colebrook

Contact(s): Thomas McKeon, Robert Suprenant, Karen Griswold Nelson

Nature of Comments:

1) Concern about the use of census blocks. 2) Provided map related comments on specific areas (9/17/2012 letter and 10/5 fax, incl map, re desire for balanced growth designation for 1000 ft corridors along Rt 8 & Rt 44, not including water resource protection areas.

OPM Response:

1) See response to LHCEO comment #1. 2) Addressed in the map details document.

Municipality: Goshen

Contact(s): Martin Connor, Paul Dombrowski, Ken Green, Ray Turri, Andy Nygren & Barry Donaldson

Nature of Comments:

1) Concerned about balanced growth areas that should lean more to conservation than to development. 2) Concerned about undesignated areas in northern area - part of land trust's goal is to connect Torrington Water land to Great Mtn. Forest in Norfolk and areas there should be conservation. 3) Undesignated area along Rt 63 going down Robert's Hill has one of the best views in CT and should be conservation. 4) Some properties are shown as protected but aren't, while some conservation easement lands aren't shown as protected. Will send data. 5) Village Center area should include Goshen town hall. 6) The area of the Woodridge Lake sewage treatment plant should also be shown as balanced growth. 7) Provided map related comments on specific areas (incl. Woodridge Lake SSA correspondence)

OPM Response:

1) Due to the new role of the Map, balanced growth are intended to indicate the presence of one or more conservation values. Per the response to Dept. of Economic and Community Development comment #1, OPM will develop a means for agencies and other interested parties to view individual data layers, based on actual boundaries (not by Census Block). Also, see response to LHCEO comment #1. 2) Municipality can provide information to OPM to add a local conservation factor to the Map, in this case to change an undesignated area to a conservation priority. 3) Municipality can provide information to OPM to add a local conservation factor to the Map, in this case to change an undesignated area to a conservation priority. 4) so noted. 5) Addressed in the map details document. 6) Addressed in the map details document. 7) Addressed in the map details document

Municipality: Harwinton
Contact(s): Michael Criss

Nature of Comments:

1) Concern about the use of census blocks and the draft POCD is not consistent with local POCD. 2) Concerned about implications for future funding. 3) Provided map related comments on specific areas

OPM Response:

1) See response to LHCEO comment #1. 2) Map only pertains to growth-related projects defined in CGS Sec. 16a-35c. If a state agency proposed action is not a growth-related project (i.e., acquisition of open space, renovation of an existing facility, etc.) the Map does not apply. If a state agency proposes a growth-related project that it deems consistent with the Plan's policies, it can undertake the project regardless of the Map category - so long as it goes through the PFA exception process of CGS Sec. 16a-35d when a project is located outside of a PFA. 3) Addressed in the map details document

Municipality: Litchfield

Contact(s): Dennis Paul Tobin, Dave Wilson, Susan Lowenthal, Carol Bramley

Nature of Comments:

1) Concern about the use of census blocks. 2) All pink (priority development) areas on the Litchfield area of the LGM should be changed to yellow (balanced growth) areas. 3) "Water resources" and "water conservation areas" are not accurate. 4) It was not possible to verify that OPM used up-to-date DEEP SSA mapping for the LGM and Litchfield WPCA wants OPM to confirm that it did. 5) The LGM doesn't designate "Rural Community Centers" in Litchfield Center, Bantam Center and Northfield Center. 6) LGM places a priority development area on prime, active farmland that has no access to water or sewer and the local plan and draft text of the state POCD consider farmland to be a priority for conservation. 7) The LGM should show a development area along old Rt 8, which is parallel to Rt 8 and largely a commercial area. It is a prime development area because it can access Torrington sewer and water. 8) Provided map related comments on specific areas (see two 10/2/2012 letters to Bruce)

OPM Response:

1) See response to LHCEO comment #1. 2) Addressed in the map details document. 3) OPM will use other more accurate data when submitted by municipalities, RPOs or others. 4) Addressed in the map details document. 5) Village Growth Areas will be delineated based on boundary information upon receipt from the town. 6) The policies in the text are the driver of a state agency's determination of consistency; not the Map. See response to LHCEO comment #1 for further town options regarding Map changes. 7) so noted 8) Addressed in the map details document

Municipality: Morris

Contact(s): Barbara Bongiolatti, Robert McIntosh, Karen Griswold Nelson

Nature of Comments:

1) Concern about the use of census blocks. 2) Share concerns of other towns about accuracy of mapping and potential effect on future funding. 3) Provided map related comments on specific areas (see 9/18 letter and 10/5 fax with map)

OPM Response:

1) See response to LHCEO comment #1. 2) See response to Harwinton comment #2. 3) Addressed in the map details document

Municipality: New Hartford

Contact(s): Rista Malanca, Robert Krzys, Martin Connor

Nature of Comments:

1) Concern about the use of census blocks. 2) Federal Highlands Conservation Act, which covers much of NW CT, should be mentioned in the POCD's GMP4 text and a link provided. 3) Some areas shown as protected but aren't others are shown as unprotected but are. 4) Provided map related comments on specific areas. 5) Some areas inconsistent with town mapping - New Hartford Center Zone should be village district - mixed use, another area is zoned business and should also be village district. 6) West Hill Lake is shown as undesignated or development area - zoning is 4-acre and it should be conservation area. 7) New Hartford Land Trust would like six parcels listed as "New Hartford Land Trust - Fee" to be designated as priority conservation even though not protected. (see Rista Malanca's 9/17 memo and 10/4 email to DM & 10/5 Robert Krzys memo)

OPM Response:

1) See response to LHCEO comment #1. 2) The GMP 4 policy that begins "Protect and preserve natural areas..." will be amended to include reference to highland areas. 3) OPM will use other more accurate data when submitted by municipalities, RPOs or others. Also, see response to Housatonic Valley Association comment #4. 4) Addressed in the map details document. 5) Addressed in the map details document. 6) Addressed in the map details document. 7) Parcels will be shown as a local conservation priority.

Municipality: Norfolk
Contact(s): Susan Dyer

Nature of Comments:

1) The LGM contains many inaccuracies and what it identifies as a priority for development does not coincide with our POCD. Review our POCD to see where we foresee our future. We should be more of a Village Development Area than what is shown on the LGM.

OPM Response:

1) Addressed in the map details document.

Municipality: Torrington
Contact(s): Martin Connor

Nature of Comments:

1) Concern about the use of census blocks - some areas shown as growth that are not growth in town plan. 2) Some areas shown as protected but aren't and others are shown as unprotected but are. 3) Will provide data as GIS shapefile and provided map related comments on specific areas

OPM Response:

1) See response to LHCEO comment #1. 2) OPM will use other more accurate data when submitted by municipalities, RPOs or others. Also, see response to Housatonic Valley Association comment #4. 3) Addressed in the map details document.

Municipality: Winchester

Contact(s): Dale Martin

Nature of Comments:

1) The municipal POCD shows a transition from the developed assets of Winsted to the conservation assets of environmentally sensitive areas and the state POCD should show the same transition. There is little need for additional high or even medium-density development in undeveloped areas outside Winsted and the local POCD directs development to downtown and surrounding neighborhoods, where it can accelerate the revitalization of downtown. 2) Provided map related comments on specific areas (written comments re balanced growth areas in vicinity of Highland & Crystal lakes that should be priority conservation areas)

OPM Response:

1) See response to LHCEO comment #1. As noted in the Map chapter, the new priority funding area requirements do not allow for this Map to reflect a graded transition. However, the underlying data layers will be made available for interested parties to view or use as appropriate, without the constraints of Census Blocks (see response to Dept. of Economic and Community Development comment #1.) 2) Addressed in the map details document.

Lower CT River Valley Council of Governments

Contact(s): Linda Krause, Margot Burns, Dan Bourret

Nature of Comments:

1) More accurate map data is needed; need a standardized data base. 2) Map should differentiate what each classification is and how it was developed. 3) Greenways should be included in the conservation criteria and shown as polygons on the Map.

OPM Response:

1) OPM recognizes the need for a more robust framework for GIS as noted in the first GMP 6 policy. In the meantime, OPM will accept any data submitted by a municipality or RPO that is more accurate than the source data of the state. OPM will also accept any data depicting local conservation priorities that are not presently reflected in the Map's statewide conservation criteria. 2) OPM will add language in the Map chapter to clarify this. 3) OPM did not include greenways as a conservation factor because we believe the data is only available as lines; not polygons.

Municipality: Clinton

Contact(s): Christine Goupil

Nature of Comments:

Provided specific map-related comments and information.

OPM Response:

Addressed in the map details document

Municipality: Durham

Contact(s): Dan Bourret, for Geoff Colgrove

Nature of Comments:

1) There are issues with the LGM : better data is needed.

OPM Response:

1) See response to LCRVCOG comment #1.

Municipality: East Hampton
Contact(s): Michael Maniscalco

Nature of Comments:

Provided specific map-related comments and information.

OPM Response:

Addressed in the map details document

Municipality: Haddam
Contact(s): Liz Glidden

Nature of Comments:

1)LGM Is inaccurate and needs to be corrected. OPM needs to work with the COG in making corrections.

OPM Response:

1) See response to LCRVCOG comment #1.

Municipality: Middletown
Contact(s): Bill Warner

Nature of Comments:

Provided specific map-related comments and information.

OPM Response:

Addressed in the map details document

Municipality: Old Saybrook
Contact(s): Christine Nelson

Nature of Comments:

Provided specific map-related comments and information.

OPM Response:

Addressed in the map details document

Municipality: Portland

Contact(s): Deanna Rhodes

Nature of Comments:

1) Map is problematic due to errors in data. Request additional time and a simplified process that allows towns to comment before the Map is final.

OPM Response:

1) See response to LCRVCOG comment #1. OPM has developed an online tool that several municipalities found useful in submitting their map comments. The Continuing Legislative Committee on State Planning and Development is required to hold a public hearing within 45 days of the start of the 2013 legislative session, so that will provide municipalities and other interested parties another opportunity to submit formal comments. OPM will seek the Continuing Committee's approval to continue accepting municipal map comments and/or data up until a specified date before it needs to be transmitted by the Committee for consideration of approval by the General Assembly.

Municipality: Westbrook

Contact(s): Meg Parulis

Nature of Comments:

1) Provided specific map-related comments and information. Information to be forwarded through the COG. 2) Town wants their town center area identified as a Village Growth Area and noted that the same area is called a Village Development Area on the LGM.

OPM Response:

1) Map comments accepted. Addressed in the map details document. 2) Town center will be changed to Village Growth Area and OPM will correct inconsistent usage of term.

Northeastern CT Council of Governments

Contact(s): John Filchak, Jim Larkin

Nature of Comments:

1.) Is there a definition of Historic Facilities? Could Historic Facilities be located on the LGM? 2.) Village centers are innaccurate for Northeastern Communities and may need to be considered Balanaced Growth rather than Priority Development. 3.) Consider adding State and National Register Historic Districts to the Geographic Depiction of GMP 4. 4.) State and National Scenic Roadways should be identified. 5.) Depicting Priority Development Areas in shades similar to the interactive map would be useful so users can better understand the number and significance of the criteria present. 6.) Can Village Growth Areas be defined separately within Priority Development Areas.

OPM Response:

1.) OPM has a database of historic properties provided by the State Historic Preservation Office. This information in its current form may not be able to be mapped. 2.) OPM recognizes the shortcomings of this data and will modify it based on local input received. In addition OPM will modify its application of Village Centers. 3.) OPM will add historic districts as requested. 4.) OPM will investigate the availability of that data on a statewide basis and include it, if possible. 5.) That information is available on OPM's website under "PDF Version of Locational Guide Map and Supporting Maps". The supporting maps show the gradation by number of factors for both Priority Development Areas and Priority Conservation Areas. Also, see related response to Dept. of Economic and Community Development comment #1 in "State Agencies" comment document. 6.) In certain limited instances, OPM will depict Village Growth Areas as "overlays" of Priority Development Areas where requested.

Municipality: Ashford

Contact(s): Michael Gantick

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Brooklyn
Contact(s): Jim Larkin

Nature of Comments:

Provided map related comments on specific areas.

OPM Response:

Addressed in the map details document

Municipality: Canterbury
Contact(s): Steve Sadlowski

Nature of Comments:

Provided map related comments on specific areas.

OPM Response:

Addressed in the map details document

Municipality: Plainfield
Contact(s): Ryan Brais

Nature of Comments:

Provided map related comments on specific areas.

OPM Response:

Addressed in the map details document

Municipality: Union

Contact(s): Albert Goodhall

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Woodstock

Contact(s): Jeffrey Gordon, Delia Fey

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Northwestern CT Council of Governments

Contact(s): Dan McGuinness, Patricia Allyn Mechare

Nature of Comments:

1) Concern about the use of census blocks. 2) The draft POCD does not conform to statutory requirements and does not provide useful direction for state or local administrators expected to implement policies. CGS 16a-27(c) requires POCD to address natural hazards and the POCD only mentions them twice. CGS 16a-27(d) requires the POCD to identify priority funding areas and only village growth areas are specifically called out as being priority funding areas. CGS 16a-27(d)(3) requires the POCD to identify corridor management areas but the plan doesn't do anything more than show some transportation features. on the LGM. CGS 16-27(e) requires the POCD to assign priorities, estimate funding, identify responsible entities and establish a schedule for each policy, but it does not. 3) The LGM is the first and sometimes the only thing many people look at and the draft LGM provides a misleading picture of what should be developed and what should be preserved. 4) Use of rural community centers from 2005-2010 POCD should be eliminated to avoid meaningless identification of areas isolated from locally-recognized village areas. 5) If US Census Bureau urbanized area mapping is the only development factor for a census block, the area should not be designated a priority development or balanced growth area. 6) The LGM should use natural diversity database instead of critical habitats. 7) The Housatonic River is a major resource in NW CT and a designated greenway, but small sewer systems in some small towns cause large areas along the Housatonic to be designated as priority development or balanced growth areas. 8) CGS 16a-27a says POCD must take greenways into account and, although the draft mentions greenways and includes a map that shows state greenways, that map includes no information about municipal greenways and doesn't identify state-owned lands for inclusion in the greenway system. 9) The draft text mentions the importance of preserving historic resources, but historic districts and sites are not factors for determining conservation & development designation. 10) Provided map related comments on specific areas

OPM Response:

1) OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries, which uses Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. State agencies and other interested parties will be able to access specific data layers, such as sewer service area, when determining the consistency of their actions with the Plan (see response to Dept. of Economic and Community Development comment #1 in "State Agencies" comment document. 2) OPM believes it has developed a Draft Plan that complies with relevant statutes, and defers to other statutorily required plans, such as the Natural Hazard Mitigation Plan, to supply additional details/guidance. OPM will add language to the map chapter clarifying the priority funding area designations and application. See response to Dept. of Transportation comment #8 re: corridor management areas in "State Agencies" comment document. Page 4 of the Draft Plan acknowledges that full compliance with CGS Sec. 16a-27(e) is a longer term goal. 3) As noted in the Map chapter, the Map is only applicable for growth-related projects (CGS Sec. 16a-35c), and only after a sponsoring state agency has deemed such project to be consistent with the policies of the Plan text. See response to CT Chapter of the American Planning Association comment #6 in "Statewide Organizations" comment document. 4) As noted on p. 28 of the Draft Plan, OPM provided 2005-2010 designations as a starting point and states that "Such boundaries will be modified, as necessary, upon consideration of municipal input and public comments." OPM would like municipalities to submit their village boundaries

to us. 5) As noted in #1 above, OPM will remove any development factor in a Census Block when requested by a municipality. 6) As noted in #1 above, municipalities may request that natural diversity database, or any local conservation priorities, be reflected on the Map. 7) See #1 above. 8) OPM believes that the greenway policies identified in the Plan, when supplemented by the public use criteria provided in the DEEP Green Plan (p.7-8), is sufficient to coordinate state agency efforts to develop a statewide greenways system. OPM will investigate whether DEEP has identified any state-owned lands for inclusion in the greenway system. 9) OPM will add historic districts to the geographic depiction of GMP #4 on p.20. 10) so noted.

Municipality: Canaan

Contact(s): Ellery Sinclair, Chris Wood

Nature of Comments:

1) Agree w/ NWCCOG about need to use Natural Diversity Database information. 2) What effort was made to coordinate state POCD with municipal POCDs? If map is any indication, the state plan is destructive towards planning efforts in rural towns. 3) Provided map related comments on specific areas

OPM Response:

1) Addressed in the map details document. 2) A total of 136 municipalities participated in the plan comparison process between Jan.-Apr. 2012 to compare the "planning policies of different levels of government" under Public Act 10-138. The Map was developed following that effort, and OPM is making efforts to address municipal concerns as noted in the response to NWCCOG comment #1. See related response to CT Chapter of the American Planning Association comment #6 in "Statewide Organizations" comment document concerning appropriate use of the Map. 3) Addressed in the map details document.

Municipality: Cornwall

Contact(s): Gordon Ridgway, et al., Chris Wood

Nature of Comments:

1) Commented regarding easements, the Cornwall Village water system, flood plain mapping, 490 and 1296 parcels not being designated, non-profit lands with easements not being designated as protected, farmland mapping not being complete, significant wetland soil areas not being included, potential high yield aquifers not being mapped. Some undesignated areas include natural diversity data species points - these data points indicate important species as well as critical habitats. 2) Each town should be allowed ample time to investigate and collect natural resource data. 3) Provided map related comments on specific areas (see Wood & Ridgway letters).

OPM Response:

1) The criteria used to develop the Map's priority conservation areas used the best available statewide data available, and OPM will accept supplemental data as noted in its response to NWCCOG comment #1. 2) See response to Council of Small Towns comment #1 in "Statewide Organizations" comment document. 3) Addressed in the map details document.

Municipality: Kent

Contact(s): Bruce Adams, et al., Dennis DePaul & Jos Spelbos

Nature of Comments:

1) Concern about the use of census blocks and one result is that Kent is shown with two small village areas at the ends of the actual village area and a large development area where the village area should be. Mapping should be consistent with the Village District shown on zoning maps and actual/potential sewer service area should be limited to the Village District and Kent School. 2) Greenprint will identify preserved parcels. 3) Some roads are mischaracterized. 4) Undeveloped land buffering the Housatonic River should be designated as conservation priority and features such as historic resources, scenic areas, scenic roads, recreation areas, ridgelines, and greenways should also be conservation factors. Kent has delineated a number of town character areas would like the state to use those too. 5) The Natural Diversity Database, not critical habitats, should be a conservation factor. 6) The agricultural soil criterion shouldn't be limited to blocks of more than 25 acres and the category of other agricultural soils of statewide importance should not be excluded. The LGM should use broader criteria of >10 acres and/or current/historic farmland. 7) The outer 300 ft is left out of the core forest classification because it has less ecological value, but development in the edge area will make the core forest smaller, so the core forest should extend to the road instead of starting 300 ft in. 8) The LGM only shows aquifer protection areas around community wells that serve more than 1000 people, but Kent's community well serves less than 1,000 people and our aquifer is not shown as a conservation area. High yield stratified drift aquifers north of the village along the Housatonic River and along Cobble Brook are a conservation priority to us and are on the Greenprint map. 9) Wetlands should be mapped like on previous POCD and not limited to 25 acres or greater, especially because of their increasingly important flood control function as storm intensity increases. 10) Flood zone mapping is obsolete and increased precipitation & impermeable surfaces will lead to flooding outside mapped areas. 11) The POCD doesn't address areas contiguous with CT and, because activities in NY have a regional impact affecting CT, efforts should be made to coordinate planning across the state line and share information on conservation and development priorities. 12) Provided map related comments on specific areas (as well as hard copies of 2012 POCD and "Natural & Cultural Resources of Kent, CT")

OPM Response:

1) See response to NWCCOG comment #1. 2) Addressed in the map details document. 3) OPM will review this data layer. 4) Addressed in the map details document. 5) Map comments accepted. 6) Map comments accepted. 7) If the Town prefers, OPM will add the outer 300 feet as a local conservation priority. 8) OPM will accept this data if available. 9) Addressed in the map details document. 10) OPM uses the most up to date FEMA mapping. 11) OPM does not have adequate data to represent such contiguous areas, let alone in-state data. 12) Addressed in the map details document.

Municipality: Roxbury
Contact(s): Peter Filous

Nature of Comments:

1) Majority of Roxbury is designated priority conservation area and what is the impact on the town's planning & zoning regulations and on town's ability to administer those regulations for future residential development? 2) Provided map related comments on specific areas

OPM Response:

1) See responses to NWCCOG comment #1 and to CT Chapter of the American Planning Association comment #6 in "Statewide Organizations" comment document. Also, see related response to Town of Washington comment #2. 2) Addressed in the map details document.

Municipality: Salisbury
Contact(s): Curtis Rand

Nature of Comments:

- 1) Many isolated locations are identified as priority development areas and we don't understand why.
- 2) Provided map related comments on specific areas

OPM Response:

- 1) Addressed in the map details document.
- 2) Addressed in the map details document.

Municipality: Sharon

Contact(s): Jamie Casey, Cicily Hajek

Nature of Comments:

1) Conservation Commission published 11-map Sharon Natural Resources Inventory in 2005, but the draft POCD does not include this local information. 2) The LGM identifies a wetland the town has been trying to protect as being a development area. 3) Terms of the color-coordinated map key were not defined on the map - perhaps these will be defined in the written plan. 4) We have been unable to access the online LGM to make changes. 5) Provided map related comments on specific areas

OPM Response:

1) OPM will reflect such data as a local conservation priority upon receipt. 2) See response to #1. 3) Map categories and their application will be clarified in the revised draft Plan. 4) OPM will accept Map comments in other formats, but those will take longer to address. 5) so noted.

Municipality: Warren

Contact(s): Jack Baker, Craig Nelson

Nature of Comments:

1) The LGM shows some areas as protected that are not protected and doesn't include some land that is protected - the POCD should incorporate Greenprint data. 2) It is difficult to provide detailed information with the LGM's online mapping tool because of the lack of parcel boundaries. 3) Provided map related comments on specific areas.

OPM Response:

1) Addressed in the map details document. 2) Parcel data is not available in all towns and including such information is something that will be considered as a future enhancement to the Plan's mapping tool, recognizing that some people believe such detail is not appropriate for a statewide plan. 3) Addressed in the map details document.

Municipality: Washington

Contact(s): Janet Hill, Richard Cary

Nature of Comments:

1) Town is working on its POCD update and what happens if it is different from state POCD? 2) About 30% of our land is permanent, protected open space and our assessor says increasing the amount of protected land will not leave enough land for taxes. The state should provide guidance to address this. 3) It is difficult to use the POCD mapping because town boundaries are not shown. 4) Washington has five village centers - Washington Depot, New Preston, Marbledale, Woodville and The Green - but the LGM seems to show only two. 5) LGM does not show water service, historic districts or the 100-yr flood zone. 6) Accurate open space mapping is available from HVA. Provided map related comments on specific areas (9/28 letter)

OPM Response:

1) CGS Sec. 8-23 does not require municipal POCDs to be consistent with the state Plan. Towns that are in compliance with CGS Sec. 8-23 are eligible for consideration of discretionary state funding, regardless of Map designation per CGS Sec. 16a-35d. 2) OPM does not believe that uniform guidance can be provided to municipalities on this issue, since taxes are generally driven by the demand for local services which varies from town to town. 3) This will be considered as a future enhancement for the mapping tool. 4) Addressed in the map details document. 5) OPM will investigate why this information is not shown, and may require more specific information from the Town to address it. 6) Addressed in the map details document.

South Central CT Regional Council of Government

Municipality: East Haven
Contact(s): Frank Biancur

Nature of Comments:

1) The Draft Plan is weak in comparison to the old plan which was full of information, particularly relating to the Growth Management Principles.

OPM Response:

1) This Plan revision was intended to streamline the document to focus more on the Plan's policies, and allow a broader framework within which state agencies can prepare their required agency plans and associated guidance. This framework also provides municipalities and regional planning organizations a more concise reference for when they update their respective plans as required by CGS Sec. 8-23 and 8-35a, respectively. See related response to CT Federation of Lakes comment #1 in "Statewide Organizations" comment document.

Municipality: Hamden

Contact(s): Leslie Creane

Nature of Comments:

1) Urges the state to give preference for state funding to municipalities that have already adopted regulations supporting TODs.

OPM Response:

1) Guidance on TOD is evolving at the agency level, and will be coordinated through the Plan's implementation.

Municipality: Meriden

Contact(s): Tom Skoglund

Nature of Comments:

1) Provided specific map-related comments and information.

OPM Response:

Addressed in the map details document

Municipality: New Haven
Contact(s): Susmitha Atotta

Nature of Comments:

1) Advocates for inter-state and intra-state planning to address the effects of sea level rise on coastal communities. 2) Recommends an implementation strategy for the Plan to establish priorities for state investments in urban, suburban and rural communities. 3) Suggests operational initiatives, such as: better data and a central data repository, more land use training, and an accredited planning program in the state's colleges or universities.

OPM Response:

1) State agency policies addressing this issue are covered in GMPs 1, 4 and 5. 2) See response to CT Chapter of the American Planning Association comment #7 in "Statewide Organizations" comment document. 3) The first policy in GMP 6 summarizes the state's goal to develop a robust framework for developing and sharing geographic information, and this continues to be an ongoing effort within available resources.

Municipality: North Branford
Contact(s): Bonnie Therrien

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Wallingford

Contact(s): William Dickinson, Jr., Kacie Costello

Nature of Comments:

1) Request that previously agreed-upon utility service boundaries be used for the Map, instead of the current layer based on Census Blocks. 2) Concerned about the additional cost of life cycle analysis to municipal and or utility users. 3) In order to help ensure that the Plan is applied consistently by state agencies, recommend that OPM be the point agency for making determinations of consistency for all proposed state agency actions. 4) Does a municipality have to consider consistency with the Plan when a proposed project, such as an open space subdivision in a conservation area, does not involve any state action? 5) Is there a method to be followed to identify and have corrections made to inaccuracies in the Map? 6) Suggest providing a sample illustration of the online GIS tool function related to the Map. 7) The Green Plan is referenced on p.19; is it the same as the Open Space Plan? 8) The term "critical habitat" on the GMP #4 map should include a reference. 9) The GMP #4 policy that begins "Protect and preserve natural areas..." would be strengthened by adding the term "critical habitats". 10) Listings of state agency plans should include their effective dates. 11) The term "protected open space and farmland" should be defined in the Plan text, and suggest clarifying the latter as "preserved farmland". 12) Why doesn't the term "priority funding area" appear on the legend or as an explanatory note? 13) Suggest GMP #4 recognize that it should be a goal to preserve land in large tracts and prioritize areas that abut existing preserved open space. 14) Note that p. 28 states that "Priority Conservation Areas are classified by Census Block", which contradicts p.27 that states they are based on natural conditions.

OPM Response:

1) The underlying sewer and water utilities Map layer for Wallingford will be updated to include the boundaries previously accepted by DPH/DEEP/OPM, which will replace the existing SCRCOG 2008 data for Wallingford only. Please note that Census Blocks will still be the common geographic unit for delineating priority funding areas statewide per OPM's response to Council on Environmental Quality comment #8. 2) The life cycle cost policy in GMP 1 would only apply to projects proposed outside of the existing and planned service area, and is intended to help local officials and residents/businesses understand the potential cost burdens beyond the initial capital investment. 3) OPM believes that state agencies are in the best position to determine the consistency of their actions, as that is required by CGS Sec. 16a-31(a). OPM is working with affected agencies to ensure that their determinations of consistency are done uniformly, and that advisory statements under CGS Sec. 16a-31(b) are requested whenever a proposed agency action is outside the routine. 4) For projects that do not entail a state agency action listed under CGS Sec. 16a-31(a), the Plan does not apply. While a municipality may wish to cite any of the Plan's policies in it's local approval process, the Plan's role would be purely advisory. See related response to CT Chapter of the American Planning Association comment #6 in "Statewide Organizations" comment document. 5) Since the Map is a secondary consideration after a state agency has determined the consistency of a proposed growth-related project, any inaccuracies in data can be addressed as needed on a project-by-project basis. Any funding sought for non growth-related projects (e.g., open space acquisition, farmland preservation, etc.) will be subject to the rating criteria of those programs and not this Map. OPM is working to develop a more robust system for data to be updated and shared among state agencies, regional planning organizations and municipalities. 6) Upon adoption of the Plan, OPM will conduct outreach on use of the online map tool upon request by regional planning organizations for the benefit of their member municipalities. 7) Yes. This will be clarified in GMP #4. 8) The source is DEEP's Environmental Conditions Online. 9) Agree. 10) Agree. 11) This will be clarified in the Map chapter of the Plan. 12) This will be clarified in the Map chapter and the Map itself. 13) These goals are indicated in the current Green Plan (p. 6 & 8), and the first bullet in GMP 4 will be modified to

reference "other priorities identified in the State's Open Space Plan (i.e., Green Plan)". 14) The p. 28 reference to Census Blocks is incorrect and will be removed. See related response to CT Forest & Park Association comment #1 in "Statewide Organizations" comment document.

Southeastern CT Council of Governments**Contact(s):** Richard Serra, Tom Seidel**Nature of Comments:**

1) There is confusion with LGM classifications because of broadness of areas (census tracts) and extensive areas listed under various categories may put the map in conflict with Smart Growth Principles; 2) need to verify where water service is actually available.

OPM Response:

1) OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries, which uses Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. 2) OPM will develop enhancements for the Map tool to enable interested parties to view individual data layers, such as a water service area, outside of the context of Census Blocks. See related response to Dept. of Economic and Community Development comment #1 in "State Agencies" comment document.

Municipality: Bozrah

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Colchester

Contact(s): Adam Turner, Richard Serra, Tom Seidel

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Franklin

Contact(s): Richard Matters, Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map comments.

OPM Response:

Addressed in the map details document

Municipality: Griswold

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Groton
Contact(s): Matt Davis

Nature of Comments:

1) The definition of "growth related project" and related exceptions undermine smart growth principles. 2) Will State Agencies continue to interpret and apply (or not) consistency requirements, not necessarily consistent with the Plan or the Town's priorities and planning goals, as they deem appropriate? 3) Most Towns use conventional parcel based maps and the nature of the new LGM will make the cross acceptance process "greatly complicated". 4) Draft POCD does not address benchmarking, policy priorities, implementation funding and costs as required by PA 08-182.

OPM Response:

1) Any suggested revisions to state statutes would need to be addressed legislatively. 2) Any proposed action defined under CGS Sec. 16a-31(a) would require the sponsoring state agency to determine the consistency of its action with the Plan. The exception process provided in CGS Sec. 16a-35d allows consideration by the sponsoring agency of funding a growth-related project located outside of a priority funding area. While there is no statutory requirement that state actions be consistent with the municipal plan, the sponsoring agency should make every attempt to address local concerns. 3) CT's cross-acceptance process is intended to provide greater compatibility among the "planning policies of different levels of government" per Public Act 10-138 and in accordance with the report issued to the Continuing Committee by OPM in January 2011. Please see OPM's response to Audubon CT comment #15 for an explanation of the Census Block approach to address new priority funding area requirements, which does not require a parcel-based analysis. 4) Page 4 of the Draft Plan acknowledges that full compliance with CGS Sec. 16a-27(e) is a longer term goal that will require buy-in among the legislature and Administration.

Municipality: Montville

Contact(s): Colleen Bezanson, Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: New London
Contact(s): Harry Smith

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: North Stonington

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Preston

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Salem

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Sprague

Contact(s): Catherine Osten, Sandor Bittman, Richard Serra, Tom Seidel

Nature of Comments:

Provided map related comments on specific areas

OPM Response:

Addressed in the map details document

Municipality: Stonington

Contact(s): Richard Serra, Tom Seidel

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Waterford

Contact(s): Tom Wagner

Nature of Comments:

1) Provided map related comments on specific areas. 2) Also noted that funding for school construction projects is not reviewed for consistency with the POCD.

OPM Response:

1) Addressed in the map details document. 2) Any proposed state action defined under CGS Sec. 16a-31 must be reviewed by the sponsoring agency for consistency with the Plan. The definition of growth-related project in CGS Sec. 16a-35c specifically removes school construction from the priority funding area requirements associated with the Map.

South Western Regional Planning Agency

Municipality:

Contact(s): Floyd Lapp, Margaret Wirtenberg

Nature of Comments:

1) Overall GMP's generally consistent with SWRPA POCD

OPM Response:

1) So noted

Contact(s): Margaret Wirtenberg

Nature of Comments:

1) impressed by plan and bottom-up approach

OPM Response:

1) So noted

Municipality: Greenwich

Contact(s): Diane Fox

Nature of Comments:

1) Map related comments. Comments for removal and addition of certain designations in certain areas.

OPM Response:

1) Addressed in the map details document, request to remove certain Priority Development Area designations will be accepted. Request to add Priority Conservation Area(s) will be accepted. OPM will work to correct and enhance Open Space data

Municipality: New Canaan
Contact(s): Steve Kleppin

Nature of Comments:

1) map related comments

OPM Response:

1) Addressed in the map details document

Valley Council of Governments**Contact(s):** David Elder**Nature of Comments:**

1) Is there any correlation between performance indicators and priority funding areas-- what are the performance indicators in the plan for/how will they be utilized; 2) from a planning perspective, hope for more coordination between the recommendation and the principles and the legislation that comes out of planning and development committee; 3) GMP 4 and 5-- not much public access to Long Island Sound-- recommend that in 4 and 5 you capture the need for public access

OPM Response:

1) There is no correlation at the present time between performance indicators and PFAs, as p. 4 of the Draft Plan acknowledges that full compliance with CGS Sec. 16a-27(e) is a longer term goal that will require buy-in among the legislature and Administration as a means to measure progress in implementing the Plan. OPM included "examples of performance indicators" as a placeholder for future refinement. 2) Legislative matters should be addressed to the Planning and Development Committee. 3) The GMP 1 policy that begins "Promote urban areas..." will be modified to include "access to urban green spaces and waterways."

Municipality: Ansonia

Contact(s): Bart Flaherty

Nature of Comments:

1) Ansonia has old factory sites, empty downtown warehouse space-- needs smart growth. 2) remediation-- hope the state comes up with money to develop brownfields

OPM Response:

1) GMP 1 of the Plan specifically addresses this issue; 2) State has invested funds into brownfield programs administered by DECD

Municipality: Derby

Contact(s): Tony Szewczyk

Nature of Comments:

1) how to do public access to rivers without destroying integrity of dikes

OPM Response:

1) Comment should be addressed to Dept. of Energy & Environmental Protection, Inland Water Resources Division for guidance.

Municipality: Seymour
Contact(s): Jim Baldwin

Nature of Comments:

1) For planning and development, plan should look specifically at now-defunct industrial bases in former mill towns that no longer rely on rivers and natural resources found in valley areas-- redevelop for modern times, mix-uses, public access, recreation, residential areas, reduce traffic congestion

OPM Response:

1) GMP 1 of the Plan specifically addresses this issue.

Municipality: Shelton

Contact(s): Virginia Harger

Nature of Comments:

1) Clearly state what we want the end result to be; purpose of this plan is to get consensus of area residents or to develop individual towns, cities or neighborhoods to be more efficient, etc. Unless you know where you are going you won't get there.

OPM Response:

1) The Plan lays out specific GMPs and associated policies for state agencies to follow in implementing their programs and projects. The GMPs state the desired outcomes, and municipal and regional planning statutes (CGS Sec. 8-23 and Sec. 8-35a) require consideration of the same GMPs. The examples of performance indicators are provided as placeholders for the longer-term effort of developing consensus around a meaningful set of indicators to eventually measure progress in implementing the GMPs.

Windham Council of Governments

Municipality:

Contact(s): Katherine Holt, Jana Butts, Michael Cipriano

Nature of Comments:

1) Concern about the use of census blocks - an example is in the town of Scotland, where a corner of the is designated for growth, even though it contains state forest and the development area extends four miles beyond the sewer line, through a state forest. The town open space plan shows it as open space, not a development priority. 2) State-designated greenways are hard to show on a map at this scale, but are important in this region and should be shown. 3) Flood zones should be shown even though little of Windham County floodplain mapping is available digitally through FEMA. WINCOG has developed interim flood plain mapping and those data should be included in the state map. 4) Areas of wetland soils <25 acres, all farmland soil types, including areas <25 acres, state-designated greenways, and stratified drift aquifers should also be conservation factors. 5) Provided map related comments on specific areas - data provided separately.

OPM Response:

1) OPM is recommending a uniform statewide approach to the initial establishment of priority funding area boundaries, which uses Census Blocks as the common unit. Municipalities can opt out of a development designation for any Census Block if they feel it is not representative of local plans. Municipalities may also provide data on any local conservation priorities they would like to have reflected on the Map, and rural municipalities may also opt to delineate specific boundaries for Village Growth Areas, where appropriate. State agencies and other interested parties will be able to access specific data layers, such as sewer service area, when determining the consistency of their actions with the Plan (see response to Dept. of Economic and Community Development comment #1 in "State Agencies" comment document. 2) Although OPM did not include greenways as a conservation factor, the map on p.13 will be updated to include all officially designated greenways. See related response to CT Forest & Parks Association comment #3 in "Statewide Organizations" comment document. 3) OPM will include interim flood plain mapping data provided by WINCOG. 4) See response to #1. See related response to Dept. of Agriculture comment #1 in "State Agencies" comment document. 5) So noted.

Municipality: Columbia

Contact(s): Carmen Vance, Jana Butts, David Szegda

Nature of Comments:

1) Conservation factors should also include areas of wetland soils <25 acres and all farmland soil types, including areas <25 acres. 2) Columbia's three state-designated greenways should also be included as factors for priority conservation areas. 3) Provided map related comments on specific areas (some in letter to DM and others in shapefile sent separately).

OPM Response:

1) See response to WINCOG comment #4. 2) See response to WINCOG comment #2. 3) Addressed in the map details document.

Municipality: Coventry

Contact(s): Eric Trott

Nature of Comments:

1) Coventry agrees with WINCOG's open space mapping and public comments. 2) OPM's CT Planning article would be useful in the actual plan for the purpose of clarification. 3) Provided map related comments on specific areas (comments mention that town used the interactive LGM tool).

OPM Response:

1) so noted. 2) See response to CT Chapter of the American Planning Association comment #6 in "Statewide Organizations" comment document. 3) Addressed in the map details document.

Municipality: Hampton
Contact(s): Kevin Grindle

Nature of Comments:

1) The town supports mixed uses consisting of residences and community services facilities in the historic village center, but does not support increased residential density in that village growth area. 2) The town does not seek to enhance development opportunities for non-home, non-agricultural business outside the Rt 6 business zone or for increased residential construction, but the LGM's designation of growth areas on the map is inconsistent with this. The default subdivision design is a conservation subdivision and allowances for mobile homes, two-family homes and detached accessory dwellings provides a range of housing opportunities. Areas such as that near the Rt 6 business zone are logical locations for denser housing and mixed uses with mass transit connection if there is pressure for development. 3) To think more regionally, the Hampton PZC requests OPM reconsider placing a growth node in every town. Rural towns need not have a growth area. 4) The minimum area for core forest should be reduced to 50 or at most 100 acres. Only 3 of 35 areas identified as important conservation properties fit in the 250 acres criterion and only 13 of 35 would if it's 100 acres. Small subdivision development of the last 10-20 years makes the 250 acre minimum inappropriate. 5) Cultural & historic resources are not included as conservation factors even though they are cited in the POCD. 6) Provided map related comments on specific areas

OPM Response:

1) See response to Audubon CT comment #9 in "Statewide Organizations" comment document. 2) See response to WINCOG comment #1. 3) As noted in the response to WINCOG comment #1, OPM is accepting municipal requests to add or remove village growth area boundaries, among other information. Such areas are not "growth nodes", but must meet the intentions of CGS Sec. 16a-35e re: sustaining village character. 4) Addressed in the map details document. 5) OPM will accept any data on such resources that the Town would like to have reflected as a local conservation priority on the Map. Note that any cultural or historic facility that might be affected by a proposed state agency action would not be subject to a Map review because maintenance, repairs and renovations to "existing facilities" is not a growth-related project under CGS Sec. 16a-35c. 6) So noted.

Municipality: Lebanon
Contact(s): Phil Chester

Nature of Comments:

Provided specific map related comments

OPM Response:

Addressed in map details document

Municipality: Mansfield

Contact(s): JoAnn Goodwin

Nature of Comments:

1) Concern about the use of census blocks. Mansfield's bus service is not equal to urban bus service, but its presence has led to the west side of Storrs Rd from southern Mansfield to Storrs being designated as balanced growth, which is incompatible with the rural nature of the area. University water & sewer service has caused the NW quadrant town to be designated priority development. The use of census blocks as the defining geographic area and the lack of differentiation among "urban services" are flaws in this methodology. Additional guidance should be provided to explain that the context of why an area is designated a priority development area should be factored into any review of development proposals. It should also say that application of the PDA to an entire census block should not be construed as influencing local land use or zoning decisions or local POCDs. 2) Conservation factors should also include areas of all farmland soil types having an aggregate of 25 acres and, if technically impractical to use an aggregate of 25 acres, consider using a smaller threshold for individual farmland soil map units. 3) Consider adding steep slopes as a conservation factor. 4) If the extent of priority development areas within census blocks cannot be refined, clarifying language should be added regarding balanced growth areas to explain that Level A aquifer protection areas, flood hazard areas and drinking water supply watersheds should be given greater weight. 5) Priority funding area limitations should be clarified, especially regarding conservation activities in priority development and undesignated areas. GMP 2 encourages parks & open space in proximity to high density development. 6) Provided map related comments on specific areas

OPM Response:

1) Addressed in the map details document. 2) Addressed in the map details document. 3) OPM believes that steep slopes are best reflected as a local conservation priority factor, and not a statewide factor. In order to include it as a local conservation priority, OPM would need to know what the town considers "steep". 4) As noted in the response to WINCOG comment #1, OPM will accept wholesale municipal changes to any Census Block where a development factor(s) exists. The only deviation from the Census Block approach is with Village Growth Areas, whereby municipalities define such boundaries for inclusion on the Map. While Balanced Growth Areas on the Map do not assign any values to specific criteria, it is the responsibility of the sponsoring state agency to coordinate, as appropriate, with its affected sister agencies to address potential impacts to any conservation values that might be present, prior to determining whether or not to proceed with a proposed action. Certain actions may also be subject to the requirements of the CT Environmental Policy Act. 5) The Plan's Map chapter will add clarifying language that only growth-related projects, which have been determined by the sponsoring state agency to be consistent with the policies of the Plan, need to be reviewed for their priority funding area status. The definition of "growth-related project" in CGS Sec. 16a-35c provides specific examples of typical actions that are not covered in this definition (i.e., acquisition of land for conservation and open space, etc.) and, therefore, are not subject to a Map review. A state-sponsored open space acquisition would only be subject to a review of consistency with the policies of the Plan, as required under CGS Sec. 16a-31(a), which explains why there are/will be references to open space and public accessibility in the Growth Management Principles that address the built environment. 6) so noted.

Municipality: Windham

Contact(s): James Finger

Nature of Comments:

1) The map should reflect the written policies - people focus on illustrations and the map creates false impressions about our communities and state for anyone we're trying to attract here. 2) Conservation features are important even if smaller than 25 acres and, for farmland soils, the LGM should be based on the aggregate size of adjacent farmland soil units, not just the size of individual units. 3) Our 2007 municipal POCD isn't reflected in the state plan. Our town plan includes a growth node in South Windham. An area along Shetucket River which is shown as Conservation Area in the 2005-2010 LGM is largely sand pit, which we hope to become a business/industrial park, with a road parallel to the railroad to allow trucks to bypass Windham Center and its old houses. That would be a good place for business to go, as well as to reroute truck traffic. 4) Our POCD includes complete streets plans that the state should follow instead of repaving streets the same way they were paved before. Our plan would help make areas more walkable and pedestrian-oriented and improve the existing infrastructure. The state says it is trying to embrace smart growth and complete streets plans; the town plan show how it can be done. 5) Provided map related comments on specific areas.

OPM Response:

1) The numerous outreach efforts have been intended to garner feedback that can help the map better reflect written policies at the local level, although there can be difficulties when applying state-wide criteria at a local scale. 2) See response to Dept. of Agriculture comment #1 in "State Agencies" comment document. 3) OPM is not aware of any development criteria present within the subject Census Block for it to be shown as a Priority Development Area. As such, any proposed state agency-sponsored action involving a growth-related project would need to go through the priority funding area exception process in CGS Sec. 16a-35d, and consistency with the municipal plan would be one of the considerations. 4) See response to Dept. of Transportation comment #2 in "State Agencies" comment document. 5) Comments accepted.