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Salisbury Planning and Zoning Commission 27 Main Street, Post Office Box 54 Salisbury, Connecticut 06068

RE: Comments on Proposed Plan of Conservation and Development (POCD)

Sent: Via Email

Dear Commission Members,

Thank you for the opportunity to comment on the proposed updated POCD.

Having worked with the Commission on many applications over the years, I fully support addressing the environmental impact of gravel roads. Gravel roads must either provide the infrastructure to eliminate the loss of material into the streams and lakes of Salisbury or be paved.

In the late 1970s, SCS CT compiled a publication listing sources of soil runoff into Connecticut's water. The main sources listed were roads, agriculture, and construction. Many years later, there have been notable improvements in addressing runoff from construction sites and agriculture. Gravel roads have not seen much change, even with increased traffic volumes.

The limiting nutrient in most lakes is phosphorus, found in the finer soil particles of gravel road runoff. If these particles could settle out and be removed, it would improve water quality. This requires creating the infrastructure and maintenance schedule to ensure continued effectiveness. It is for these reasons pavement is used. The cost of paving with minimal drainage infrastructure and reduced level of maintenance is enticing. I have a few ideas of how runoff quality could be improved.

- Never allow runoff to concentrate. By providing more drainage basins with smaller contributing watersheds the potential for sediment runoff is decreased.
- Send discharge to areas where it will not reenter the roadway.
- Design flows must be evaluated when discharging to a swale.
- Sometimes there is no place for runoff to run off. This concentrated runoff must be conveyed long distances. These discharge points must include an area where sediment can settle out.
- Any settling basin will need cleaning out on a regular basis and needs to have easy access for cleanout.

Water quality is more important than percent impervious area especially in a non-urban environment such as Salisbury. A change to the definition of "gravel" (drive) would result in an instant creation of numerous non-conforming properties in Salisbury unless other changes to the regulations were implemented. This in turn would primarily impact the lake front properties which in 2020 contained 21% of the grand list. Using a maximum percent impervious surface creates situations that limit the potential environmental improvements a land owner can propose. There are ways to create higher impervious areas when infiltration and water quality measures are made part of the site plan.

The proposed POCD includes governance. I do not think this discussion has any role to play in the POCD. Certainly, governance should be part of the data that makes up the POCD as it is one of the wheels that make the Town what it is. However, I view deciding what form of town government we have to be over and above what the Planning and Zoning Commission is granted to do by the State.

My last comment is about the use of the Rail Trail. The Collier's Planning Study has gone a long way to creating dialogue on this subject. The Rail Trail only needs some potholes filled and drainage grading to fulfill the needs of most of the Community. It does not need paving with its current use. Any discussion of improvements must be quantitative and based on reality when using any part of it for future multi-modal use. The Collier's studies contain broad statements suited for a larger community than Salisbury. An example, the concept of a roundabout in Lakeville is not physically feasible where shown. We do not need more signage in town and should strive to keep sign usage minimal. There should be less focus on parking and more on pedestrian accessibility. Parking in a village setting should be based on pedestrian safety and exclusive of provided spaces per use. Many village centers in New England do not mandate the number of parking spaces per square foot of building or use, and they leave it to the people to decide how far they will walk and what level of traffic is acceptable.

Thank you again for the opportunity to comment.

Sincerely,

Pat Hackett