

**Warner, Bill**

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**Subject:** FW: Plan of Conservation and Development

P, C & D has presented an overall well thought out, constructed and written document. It will be useful for planners. It is noted that the document draft is dated August 6<sup>th</sup>, 2007. It would have been helpful to have been able to review this document in more depth much earlier and with a more reasonable (longer) time line. More in depth review and comments would have been useful to the writing of the final draft and to the community's plan for the future.

Comments for consideration to enhance the document (and fine tune the plan):

1. As it is a separately constructed document it is not clear how the Year 2000 Plan of Development is intended to be used in conjunction with this new plan. Where there are differences, how would the 2000 Plan be interpreted if it is still a living document? Red-line changes would have been helpful to assist future readers to interpret these differences.
2. The maps (referred to as "figures" in the August 6th 2007 draft) are too imprecise to be used as anything more than broad brush references. They should not be relied on to pinpoint where any boundary is located with respect to "open space", "wetland", "floodplain", etc. This document does not refer to "official maps" that would be precise.
3. Table 4.5 on page 20 in the "Industrial" zone refers to Zone types that are not displayed on the map or otherwise defined in the document. I-1, IRA, I-2, IOP, NPC (reference Figure 4.5 that only displays in broad terms the zones I-3 and I-4).
4. In the paragraph above Table 4.5 on page 20 there is a discussion of subtracting "environmentally sensitive lands" to ascertain the "net developable acreage". It removes "water bodies", but does not remove "wetlands". This would intimate that wetlands can be developed. **RECOMMEND:** that this paragraph and the calculations be adjusted to remove wetlands from development.
5. On page 21, Commercial and Industrial Potential references square foot amounts of 650,000 of commercial and \$23,200,000 sq feet of industrial floor space, but these figures do not match the figures cited in Table 4.5 of 794,000 and 24,838,000 respectively. Also, the comment that slopes would make the land unusable is not the experience of this commissioner. Whole hills can be leveled for large industrial construction as evidenced by a recent application that was approved by Inland-Wetlands for the Middle St. area. The comment regarding "city sewer" access is well noted as pollution is of serious concern with industrial development.
6. Also on page 21 in the Housing Potential segment there is reference to "only 26% of the land zoned for residential uses" being developed. The slant of the reference does not indicate the city's preferred position on this. Housing means schools will be needed. Education costs are out-of-control. Is it the city's intent to build out the residential potential to its maximum? Has a cost vs. tax income study been done to provide hard statistics to base a position?

7. Again on Page 21, Mixed-Use areas only allows for 250 dwelling units. One would expect apartments to be part of this mix. The maximum cap would appear to be set on the low end. Does this meet the expectation of mix-use? Senior citizen housing and recreation would be a good targeted group to build out this Mix-Use segment.

8. Figure 4.6 does not adequately display "undeveloped residential land". My own property is shown in this area and I have private residences surrounding me that are long term developed.

9. The summary on page 22 indicates that:

a. Development in the past decade was according to plan. Given this decade of experience, what are the statistics of growth costs in education and other services in this decade that can be directly attributed to the city's plan? Adjusted for inflation, the plan going forward should have hard dollars associated with the addition of residential units.

b. The prior plan facilitated conservation of energy. What activities accomplished this goal? What are the hard facts supporting this statement?

c. The prior plan enabled the efficient supply of public utilities and services. With roads in serious disrepair and leaf pickup performed after snow has fallen, how can this plan support the statement that the goal has been met and is efficient?

d. Open space had been acquired. Yes, but how does that connect with the concept of encouraging a diverse mix of residences to preserve open space. The thoughts are counter to each other.

e. The plan is to limit growth to approximately 50,000 people. The reference does not clearly indicate if this is to be interpreted as 50,000 total residents or growth of 50,000 *additional* residents. Clarity is needed.

f. It is good to encourage commercial and industrial expansion. Jobs are needed in the city. The tax base increase these would represent without the burden of more students to educate is also a desirable goal. The more attention given to the ongoing development in the city center and river front to eliminate the vacant store fronts, the deteriorating buildings, build out a tourist attraction area, etc. the better it will be for Middletown's long term financial health.

g. The citizens desire "greater design review of all projects". A project before Inland-Wetlands currently for a parking lot along the Coginchaug River does not show innovative design review nor any consideration of "visually compatible with and enhances the existing built fabric" thought process. The river is an asset to the city that this parking lot ignores and if fact will create the conditions for harm. There should be pedestrian walkways designed into the plan from the foot bridge behind Palmer Field to Washington St (across the street from a planned nature walk on the opposite side of Washington St. along the river). On page 48, the plan again mentions "lack of pedestrian amenities and minimum landscape treatment... produce a poor quality image for this major entry into the City." Is the city working with landscape designers on city projects to bolster this intended direction for amenities and imaging?

10. On page 23.

a. With a 6.5% population growth, did this growth in tax base offset the cost in city services?

b. If the plan is to cap out at 50,000, how does this jive with the comment in the conclusions that the city will exceed this planned cap in less than 2 years?

c. A young population (36 on average) indicates that more children will be coming along and needing education. Are we positioned for that growth?

d. How large is the "baby boomer" population? No figures to support comment of it being "large". It is good to plan for seniors in a mixed use zone so that they will have housing and services within easy reach.

e. The city's planners need to continue to reduce (eliminate) the downtown blight represented by

empty store fronts and aging infrastructure. The downtown represents the public image of the city. Continued focus is needed here. The new apartment units were an excellent strategy. More of this needs to be done with both residential and commercial and landscaping enhancements. This area needs more attention in the plan.

- 11 On page 24, the plan discusses preserving the mix of “rural, suburban and urban” landscapes as its “most valuable characteristic”. It is not clear from much of the rest of the plan that there is a true intent to preserve this mix. There is lip-service given to the concern that the rural landscape is threatened by suburban expansion, but the build out plan does little to help protect this threatened area. The build out plan is overly aggressive, the preservation activity is insufficient.

On page 25 there is an acknowledgement the “cost associated with growth often exceed the revenues received”. This is “political speak” that means our tax burden has increased to cover the costs. The City has to pay its bills and the revenue needed means taxes go up when the bills add up.

- 12 On page 25, the plan is acknowledging that the residential build out would exceed 65,000. Whatever happened to the plan of capping out at 50,000? On page 26, the figure is stated as 56,000 residents and again further down on the page “a target population of 50,000 – 55,000” is referenced. The plan is inconsistent and disconnected to its own plan of containment. The plan acknowledges 11,153 additional residents potential based on net developable acres. How is this “much lower population increase than the estimated . . .”

- 13 On page 26, there is a statement that “how many lots an undeveloped parcel of land can yield may be still too permissive”, but the recommendation that follows is “no zone change which increases the density beyond what is currently allowed”. Shouldn’t the plan be to make a zone change that reduces the density? The two illustrations are good tools to indicate that the permitted density plan needs to change.

- 14 On page 27, the statement is that “3.5% of the city’s total land area. . .” is an “aggressive open space policy”. Please return to Item 11 above to reflect on the “most valuable characteristic” comment. The mix of rural, suburban and urban landscapes must be preserved, emphasis on open space preservation here. . .

- 15 I strongly disagree with the comment on Page 29 that existing regulations are “a recipe for suburban development” and that the solution is to reduce the requirements for road structures. The recommended changes enhance the risk of greater development as the suggestions reduce the cost to developers to build out safe full-service roads. The city could consider developments that have “private roads” that need to be maintained by the home association which would reduce the cost to the city. Also, this does not match the direction recommended on page 26 to have “no zone change”.

- 16 Conclusions and recommendations on page 31

- a. Aren’t “utility lands” already permanently preserved? What risk are they at to be developed?
- b. The 3<sup>rd</sup> bulleted item assumes that open spaces need to be “utilized” by human traffic. Open space is needed to be available for nature. Any incursion by humans reduces the ecological role of this space. The recommendation to have a line item operating budget for open space management is an excellent suggestion.
- c. The 4<sup>th</sup> bulleted item is providing a plan to “be more selective” on open space acquisition. Selectivity is always needed when funds are limited. A comment would be helpful to focus efforts in finding grant money to complement our own funds to acquire more space. Not enough open space is yet acquired.

- 17 The recommendations cited on page 32 for road changes may be too sweeping and lacks specificity.

- a. Is it the intent of this rule change to apply to streets that have access to sewer lines?
- b. Does the fire department and emergency services support such change that would limit access by emergency vehicles?

- c. "Lot areas and setback requirements flexibility" leaves too much flexibility. Thus any and all decisions made by commissions could be challenged by zoning board of appeals. One such situation has already occurred when the developer on the heights above Arbutus Street "gamed the system" to get 4 additional (rear) lots that were not intended to be developed per the initial Inland-Wetlands commission decision
  
- 18. It is a good plan to focus on the urban settings that need upgrading. The families that live there need to know that the city is there to help them gain and maintain a safe and healthy living environment.
  
- 19. City budgets are increasing at an unsustainable rate. 5% - 8% increases (pg 43) are going to drive people out of the city. This will put additional strain on the remaining citizens. It is good that we have a favorable climate for builders, but then again is that growth straining our capacity to budget for this growth? Have we worked the numbers to be specific about the costs of growth?
  
- 20. On page 46, there is a reference to "unless sanitary sewers are extended into the Limited Industrial (I-4) Zone. Is this planned? Is it NOT planned? The plan doesn't say. Any plan should be specific about intent if the statement is going to be dangled out there.
  
- 21. On page 55, there is a last minute aside to "Habitat Preservation". With all of the prior pages focused on development, there is insufficient balance in focus on this topic. It is impossible to preserve habitat if the focus is build . build . build .
  
- 22. On page 57, in bold, the first planning principle is to "Limit the Sprawl of Low-Density Housing". If the intent is to conserve the remaining open space, then this goal can be achieved. But if the plan is to develop high density housing into these 6000 acres, then the plan is going to grow the city beyond the 50,000 desired population and set us up for future education costs that will drive up the tax base beyond a sustainable level

Again, on balance, this was an excellent work product, but I ask the drafter to be open to making changes that the city residents want.

Thank you for the opportunity to review this and to comment on it

Joan Liska

Inland-Wetland Commissioner