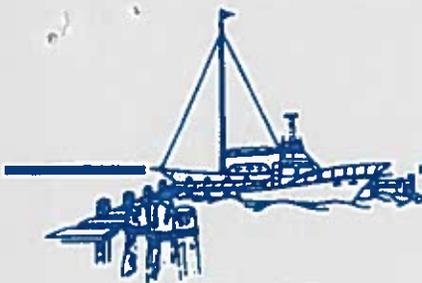


Exhibit 10



Docko, Inc. *Serving the waterfront community since 1987*

P.O. Box 421, Mystic, CT 06355 (860) 572-8939 Fax: (860) 572-7569, email: office@docko.com

June 17, 2019

Mr. Dennis Goderre
City of Groton Planning & Zoning Commission
295 Meridian Avenue
Groton, CT 06340

*Rec'd 6/20/19
City Planner*

Re: Norman Bloom and Sons, LLC
Site Modifications, 107 Thames St.

Dear Mr. Goderre,

In receipt of your comment #42 regarding the Special Permit criteria #10: we are sending the following:

Plan of Conservation and Development

During the formulation of this project, the key emphasis by Aero's Oysters and Norm Bloom & Sons, LLC, has been to make use of waterfront parcel in Groton, to make access to the Thames River oyster beds more efficient and less dependent on sometimes hazardous and always onerous trips through New London Harbor and around Avery Point over to Noank, where Aero's is based. The site at 107 Thames Street provides an excellent opportunity to accomplish this and the proposal mutually supports the City of Groton's Plan of Conservation and Development. This project is an opportunity to help achieve some of the sought after characteristics for Thames Street, which includes helping to establish the critical mass of developing activities, emphasizes access to the water, continue to provide scenic vistas of the harbor, and promote historically appropriate uses of the waterfront in this case. The development at 107 Thames Street accomplishes all of these and continues to provide the scenic overlook of the property and the boating activities, of the harbor, including the port of New London, State Pier, and ferry services to the south.

This venture represents a substantial private investment towards the site's restoration of docking facilities, maintenance of the existing historic shorefront, and does so without imposing any additional demands on infrastructure, such as parking. This plan also promotes business and economic development, which will help to sustain a diversified economy and a variety of employment opportunities, which naturally will enhance the City.

Section 5.3 of the POCD deals with managing activities in the coastal area. The proposed project protects coastal resources, provides for coastal access for existing shell-fisheries operations, and is a high priority water-dependent use.

The appropriate coastal resources, which were identified in the application associated with this project have been addressed and this project is fully consistent with resource and use policies that are appropriate to New London Harbor and this section of the Groton Shoreline. As mentioned earlier, the scenic view from the Thames Street sidewalk is unique and available to all who walk Thames Street in the project area. Visual coastal access is significant at this site, and the project is consistent with the water-dependent use management philosophy expressed in the POCD. This project will also provide clean up for a long-neglected site. The new site will be trim and orderly in addition to being commercially productive and environmentally friendly. This project enhances community character and diversity, which are both high priorities of the POCD. This project is consistent with the City regulatory programs administered through zoning, as well as U.S. Army Corp of Engineers coastal permitting priorities, and the Connecticut DEEP's CT Coastal Management Act which is addressed as a part of this application as well as the upcoming DEEP permits for temporary and permanent shellfish/aquaculture vessel access at this site. All of this is

accomplished without imposing or demands on infrastructure of the City, including roadways, electrical or water services and maintains an open and unparalleled, vista of the harbor to residents in the area.

This project will enhance the overall character of the community in avoiding obstruction of the horizon or the shore with the placement of wired utilities underground, in addition to the efforts of implementing "low impact development" to minimize the quantity of stormwater runoff with the use of natural materials, and minimizing pavement, soil preservation with the installation of a gabion wall parallel to the steep slope, preparing for future rising sea levels in the project design, by raising the current seawall to enhance storm protection for the site.

Yours truly,
Dock, Inc.

A handwritten signature in blue ink, appearing to read "Keith B. Neilson", followed by a horizontal line extending to the right.

Keith B. Neilson, P.E.

CC: Mr. Norman Bloom, Aeros
Mr. Jim Markow, Aeros
File: 19-02-3006 AEROS, 107 THAMES ST