

## Response to Staff Review Comments

### Planning & Zoning Applications

Site Plan #469

Special Permit #461

CSP #314

#### COMMENT #4

**Date:** April 5, 2019  
**Address:** 75 Eastern Point Road, Electric Boat  
**Project:** South Yard Assembly Building  
**From:** Kristen E. Solloway, PE Fuss & O'Neill, Inc.

#### Overview

##### General

1. The property is over 1,000' from the City of Groton and City of New London municipal boundary. The Mean High Water line depicted upon SY-C-011 thru 012 was presumed to be representative of the western boundary line. Applicant is requested to confirm this western (waterward) property boundary is correct.<sup>1</sup>

**The western property mean high water line is the property line and it is over 1,000 ft. away from New London.**

2. The applicant made staff aware the western deck may be reduced in size as a result of value engineering. The design of the deck must be determined as part of the review of this application.

**There are no changes to the western deck at this time**

3. What other improvements associated with this application may be value engineered? Other revisions may have a direct impact upon the site plan and special permit review. If other revisions are necessary to meet budgetary objectives, what are they?

**There are no other value engineering items at this time.**

4. Sheet SY-C-010: Note 4 references the incorrect zoning district.

**Final documents will have the correct zoning district.**

5. Applicant shall provide calculations to assist with fire suppression requirements of the building.

**Fire suppression calculations will be submitted upon completion.**

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<sup>1</sup> Source: Town of Groton GIS data

## Floodplain Permit

1. Provided within prior comments

## Coastal Area Management

1. Provide a copy of the CT DEEP application referenced in the CAM application.  
**A copy of the CT DEEP application will be submitted.**
2. References are made to various attachments (i.e. M1M3 and M5). Please provide.  
**M1, M3 and M5 are included with this submission.**
3. Provide a brief description and location of the 4 priority and 22 additional habitat restoration projects.  
**A description and location of the 4 priority and 22 additional habitat restoration projects are included with this submission.**
4. Provide a map highlighting all coastal/aquatic resources referenced in the CAM application.  
**A map(s) highlighting all coastal/aquatic resources is included in M1 (Natural Resources).**
5. CGS 22a-92a:
  - a. Goal 8: Explain how the project is compliant with the State Plan of Conservation and Development.

**In our initial submission, in the narrative on Coastal Management Act (“CMA”) compliance that was submitted with the application, there were two conflicting responses concerning compliance with the State Plan of Conservation and Development (the “Plan”). In response to the policy in CGS § 22a-92(a)(8) (“To coordinate the activities of public agencies to ensure that state expenditures enhance development while affording maximum protection to natural coastal resources and processes in a manner consistent with the state plan for conservation and development adopted pursuant to part I of chapter 297”), we wrote that the proposed activities were compliant. In our response to the policies in CGS § 22a-92(d) (“In addition to the policies in this section, the policies of the state plan of conservation and development adopted pursuant to part I of chapter 297 shall be applied to the area within the coastal boundary in accordance with the requirements of section 16a-31”) we wrote that the policy is not applicable to this application. Pursuant to CGS § 16a-31(a), the policies in the Plan of Conservation and Development are only applicable to actions taken by a state agency – the plan is not applicable to actions taken by a private entity. In addition, CGS § 22a-92(a)(8) on its face applies to the actions of public agencies when state expenditures are involved. The activities associated with this application are not being taken by a state or public agency and there are no state expenditures for these activities; as such, the CMA policies in CGS § 22a-92(a)(8) and CGS § 22a-92(d) do not apply this application. Please consider that our statement regarding CGS § 22a-92(a)(8) as having been revised by this submission.**

- b. Goal 9: Elaborate on the coordination that has/is taking place between agencies and the economic development benefits.

**As part of the application to CT DEEP, input was sought from, and provided by, the City of Groton Harbor Management Commission and Shellfish Commission. The applications for activities regulated by the U.S. Army Corps of Engineers and the CT DEEP were processed simultaneously by those two agencies, with regular consultations between the agencies, as well as other state and federal agencies, such as the Connecticut Department of Economic and Community Development, the U.S. Environmental Protection Agency, and the National Oceanic and Atmospheric Administration. For local land use applications, the CT DEEP has been consulted on Coastal Management Act policies as part of local coastal site plan review. The economic benefits of the project include the creation of high-skill, high-paying, jobs for the construction of the Assembly Building, and then jobs for the manufacture of the Columbia class submarine. The project will also help secure Electric Boat's future as the preeminent manufacturer of submarines in the country for the U.S. Navy, with a long-term contract to build 12 Columbia class submarines, which work will last for decades.**