

I am part of a group of residents who met with EB and Fuss and O'Neill representatives on three separate occasions, in January, February and March. (Each meeting we were informed of additional news (bad for us) regarding the project; including the receiving station structures close to the EB property line and then finally the disclosure of the height of the floating dry dock → 70 FT. which would ultimately block any possible river view from our neighborhood.) We also weren't

told that the FDD ~~was~~ is not under your jurisdiction. ~~we~~ I found out separately, AFTER the window for public comment was closed.

We have numerous concerns about the current plan as described in the special permit application, including visual, noise and traffic impacts, and ultimately making our neighborhood feel that it's a part of, instead of adjacent to, the industrial zone. I am not an engineer, a project manager, or an architect, and while I've been looking at the exhibits posted on the website, I don't feel there has been adequate time for residents to review the very recently submitted information provided by the applicant. That said, I do have some comments.

First, I'd like to address the separate narrative they provided in their application, explaining how the application addresses each Special Permit Criteria in Section 9.4. **They stated that** "As an industrial use proposed in the IT Zone, the project is consistent with the Zoning Regulations, the Plan of Conservation and Development, and is in harmony with other uses on the property and in the district." We believe that components of this project contradict the POCD, which I will outline later. **They stated that** "consideration has been given to the protection of environmental resources, including the mitigation of impacts that could not be avoided. The project will not have a detrimental effect on neighboring properties and will not result in any nuisances to the surrounding area, in that the proposed use is identical to existing uses on the site and will not result in any new off-site impacts." If the proposed use was truly identical, they wouldn't have a problem utilizing the facilities already in place, not to mention that the neighbors strongly believe there will, in fact, be a detrimental effect on our neighborhood and quality of life. **They stated that** "Moreover, the design of the building is in keeping with existing large assembly buildings on the EB property and therefore suitable in relation to current site characteristics." Interesting that, just because another huge building is already in place, they're downplaying the size and visual impact of this new, separate building. **They stated that** "As evidenced by the traffic study, the streets in the area can accommodate the traffic that may eventually increase due to the construction of the project when EB employment increases in future years." Yes, we have good roads, but we also know that they needed to amend the traffic study, as they left out key intersections, and we also believe that the timing of the study should be widened to truly capture when the traffic starts. **They concluded that section** by discussing that public utilities and services are adequate and won't be overburdened; to that, I can only trust that the peer review consultants and city staff can confirm that information.

Regarding the city's Plan of Conservation and Development, we believe that the current plan contradicts the POCD in the following ways:

- 1. The POCD mentions the term "sense of place" referring to locations which exhibit characteristics that make a place special or unique and/or foster a sense of fondness or attraction. Considering EB property runs one solid mile from Allen St (with a parking lot) to Triton Place (another parking

~~we~~ I don't want to push the project to VA. I appreciate the economic value to Groton + Ct. But I think

I appreciate the economic value to Groton and U, but I don't feel that an entire 1mi strip of the city needs to be visually removed from the city for that to happen. River

lot), which is less than a quarter mile from the Five Corners revitalization area included in the POCD, visitors and residents will be hard-pressed to have a sense of anything other than EB.

2. The POCD discusses finding ways to promote easily accessible development along Thames St; the increased/ongoing traffic from EB employees and deliveries will make it very difficult for Groton residents, let alone non-residents, to easily get to the area, let alone try to find parking. And if Thames St is made one-way to improve the parking and pedestrian situation, and pavement width is reduced on Mitchell St, as described in the POCD? It will be nearly impossible to get in or out of the area.

3. The POCD states the City intends to maintain and improve the integrity of residential neighborhoods, to provide a variety of housing types, to retain the viability of single-family areas, and to discourage intrusion of commercial, industrial or parking zones upon residential zones. I realize my neighborhood is adjacent to the industrial zone and not within, but the impact of this project will 100% effect the integrity of my neighborhood, and feels like an intrusion. The neighborhood including Chapman St, Nicholas Ave and Triton Place have a total of three 2-3 family homes. By comparison, the neighborhood east of Benham Rd has over 60 2-3 family homes. The only other neighborhood with a very low number of 2-3 family homes is south of Pfizer, where home prices dramatically increase. While no one can predict whether single family homes will transition to multi-family homes as a result of this project, it's notable that there are a large number of 2-3 family homes in the neighborhoods east of the EB property on Thames St.

4. The POCD notes that coastal access, including visual access, is vital to coastal communities, and states that enhancing, maintaining and improving visual access is a key element of the coastal management project, including that the City will consider ways to protect, preserve and enhance visual coastal access. These buildings will very obviously make that impossible for a large portion of the City.

I was able to briefly review the alternatives analysis (there are a LOT of exhibits to look through, especially for a layman) and what struck me was that it stated "this alternative is capable of allowing production of the number and type of submarines identified in the project purpose and need." It goes on to state the concerns regarding structural stability during excavation of the existing graving dock, and issues with maintaining security with ongoing production of the VIRGINIA class. It also stated that "by being a centralized approach to assembly, it eliminates the need for redundancy in some of the Groton facility infrastructure." The table provided with the analysis indicates there would be a significantly smaller dredging area, zero bedrock removal and less shadowing. There would be more permanent fill, but there's already permanent fill in place in the South Yard. I couldn't identify what the exact footprint would look like if the assembly building went in the North Yard, but it seems that it would have less of a visual impact in that location, which already has large buildings blocking views, compared to the South Yard, that opens up the view of the river for the city. I understand that the logistics are very complicated, and I don't mean to undermine the amount of very careful work that would be required to maintain structural integrity and safety for employees, but given the impact to the health, safety and welfare of the area adjacent to the South Yard, and the current contradictions to the POCD, moving the project to the North Yard Alternative may make more sense.