

October 19, 2020

Town of Essex
Harbor Management Commission
29 West Avenue
Essex, CT 06426

RE: Bombaci Family LLC Proposal

To the Commission:

The purpose of this letter to the Essex Harbor Commission is to provide public comment on a pending application by Bombaci Family LLC to construct an elevated platform and expand an existing dock to support a marine construction business and shad fishing at a location proximate to the Pettipaug Yacht Club and Essex Boat Club to the south, and residential shoreline properties to the north. Included in the proposal, to be submitted to the CT DEEP pending Commission approval, is a system of fixed and floating docks extending 64' into the River, dolphin piles, and shoreline protection.

While I am a member of the Pettipaug Yacht Club, the comments below reflect my own views based on a background of ecological studies encompassing the lower river and spanning 35 years. On page 24, footnote 12, of the Essex Harbor Commission Plan, the Commission highlights the need to provide protection of this valuable resource and references, as supporting documentation, American Fisheries Monograph # 1, The CT River Ecological Study, Merriman and Thorpe, 1976. As a young biologist, I had the good fortune to join the study in 1970 working out of the Essex Marine Laboratory, now the Essex Yacht Club. A sequel to that report was published in 2004 as American Fisheries Society Monograph # 9, Jacobson, et al*. Together, these documents summarize our current understanding of the significance of the ecology of the lower Connecticut River and therefore, its need for protection.

Additional supporting evidence for protection of the River includes numerous important ecological designations:

- 1) Designation as one of the Nature Conservancies 40 Last Great Places requiring protection;
- 2) Incorporation into the International Ramsar Convention Treaty recognizing the ecological significance of the tide lands of the lower River;
- 3) Establishment of the Silvio Conte Fish and Wildlife Refuge, providing resources and funding under jurisdiction of the U.S. Fish and Wildlife Service; and,
- 4) Selection as the U.S. first National Blueway under federal legislation that provides additional funding for restoration and preservation.

These designations, along with the criteria established in the Harbor Commission's Plan, provide the basis for evaluating further development along the lower river within the Essex Harbor Commission's jurisdiction.

In that regard, I offer the following comments:

Since the proposal includes modification and enlargement of an existing facility for commercial purposes, it would seem prudent to ask the applicant to provide a systematic accounting of how this project supports and is consistent with the goals and policies of the Essex Harbor Commission. Because, on the face of it, the size, scope and use, given the project's location, appear inconsistent with those policies.

Potential issues to address, as a minimum, include:

- 1) **Boating Safety:** Potential conflicts exist given activities of the two neighboring yacht clubs to the south and, in particular, the predominant activity at Pettipaug; sailing instruction for young children in small sail boats.

2) Aesthetics: Well there are two views of this, one from the water and the other from land. Neither view is enhanced from this development. In addition, the project appears inconsistent with the viewshed goals of the Gateway Commission.

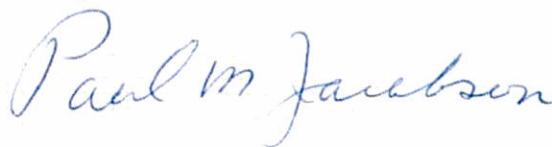
3) Conservation: The project encroaches not only on open water utilized by the adjacent yacht clubs but also the natural shoreline, the riparian upland, and the flood plain.

4) Public Access: This is a private development for commercial purposes attributed to one business. Beside the marine construction aspects, if other fisherpersons are allowed use of the docks and platform for shad fishing, the commercial nature of this project expands.

Other attendant issues that may be beyond the Harbor Commission's purview but need to be addressed and perhaps should be referred to other Essex land management committees include; management of the gravel access road including expanding and regrading to accommodate added traffic and turnouts; providing safe interface between the gravel road and River Road given additional vehicle traffic; additional noise in a residential zone considering the nature of marine construction activities; onsite sanitation requirements; and likely construction of landward structures in the flood plain.

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*The Connecticut River Ecological Study (1965-1973) Revisited: Ecology of the Lower Connecticut River 1973-2003, American Fisheries Society Monograph 9. Paul M, Jacobson, Douglas A. Dixon, William C. Leggett, Barton C. Marcy, Jr., Ronald R. Massengill, editors.