

September 6, 2022

The Town of Old Lyme Planning Commission
Old Lyme Memorial Town Hall
52 Lyme Street
Old Lyme, CT 06371

Dear Commission Members:

We write as Co-Chairs of the Town Open Space Commission regarding the resubdivision application by Keystone Capital Corporation to create 9 building lots located at 16 Neck Road, Old Lyme.

This 12.3 acre waterfront property with 180 +/- frontage on the Connecticut River was purchased for \$1,050,100 million in November 2021 reflecting the current market value of land in town. We understand that the applicants anticipate a gated community with a private road and a possible river dock with deep water access to Long Island Sound.

Old Lyme subdivision regulations § 219-42, B. state “the [Planning] Commission shall be guided by, but not limited to, a standard of 15% of the land area of the subdivision and a minimum reservation area of one acre” to be preserved as open space.

It appears that no open space is indicated on the applicant’s plan and, even if land were set aside, the gated premises to be accessed by private roadway would not afford public access.

In accordance with the provisions of C.G.S. § 8-25, when there is not a suitable area within a subdivision and when there are other areas with Town that the Open Space Commission considers more beneficial to be preserved, the Planning Commission may authorize the applicant to pay a fee in lieu of open space of up to 10% of land’s pre-subdivision appraised value.

While it is the Planning Commission’s discretion to determine such payment, a 10% fee of the purchase price would equal \$105,010.

Although we cannot identify the specific parcels, we will report to you that the Open Space Commission is now actively talking to or considering approaching the owners of at least four properties in Town for acquisition.

We will not recite here all the ecological, climate change mitigation, economic and societal benefits of open space, which are well documented in nearly 40 pages in the 2020 Town Open Space Plan revision.

Rather, we would simply mention that the Town’s 202 Plan of Conservation and Development states as a goal, “actively pursue preservation of open space in accordance with the updated Open Space Plan. [And] Seek open space that complements and connects to existing open-space areas, provides for linkage of larger tracts, wildlife corridors, creates greenbelts and a town-wide trail system.”

We can assure you that all the properties the Open Space Commission is now exploring do meet these criteria.

At the Commission's budget hearing this past winter, we asked the Board of Finance to consider increasing the Town's annual open space acquisition fund contribution of \$75,000. That level of support, established over 20 years ago, has never been adjusted for the considerable inflation that has since occurred.

Although the Board of Finance declined to act upon the request, they did assure us that acquisition of open space was a top priority for the Town, to be supported with additional funding if needed.

We respectfully request that Planning Commission use this opportunity afforded by State law and Town regulation, and its own wise discretion, to allow the applicants to contribute a full 10% of the value of this property to the Town's acquisition fund.

We believe that such a decision will benefit the taxpayers of Old Lyme and, of note, add to the attractiveness of our community for any new neighbors who may reside at 16 Neck Road.

Respectfully submitted,

/s/

Amanda Blair
Co-Chair
Old Lyme Open Space Commission

/s/

Evan S. Griswold
Co-Chair
Old Lyme Open Space Commission

CC: Kim Groves
Edward M. Cassella, Esq.