Lower Connecticut River Valley Council of Governments
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Regional Planning Committee

October 21, 2025

Mr. Bernie Gigliotti, Chairman
Lyme Planning & Zoning
Commission 480 Hamburg
Road
Lyme, CT 06371

SUBJECT: Lyme's Plan of Conservation & Development

Dear Mr. Gigliotti:

Pursuant to Section 8-23(h)4 of the Connecticut General Statutes, which requires submission of plans of conservation & development to the council of governments for review and comment, the Lyme Planning & Zoning Commission has referred the referenced plan to the RiverCOG Regional Planning Committee for review. An advisory report by the COG is to provide findings regarding the consistency of the proposed plan with (A) the regional plan of conservation and development, (B) the state plan of conservation and development, and (C) the plans of conservation and development of other municipalities in the area of operation of the COG. State statutes don't require a local POCD to be consistent with the regional, state and local plans, but requires the COG to report on such consistency to the P&Z. This review is being conducted to provide the advisory report for the Commission's public hearing, scheduled to commence on November 12, 2025.

Consistency with the 2021 – 2031 Lower CT River Valley Plan of Conservation & Development (RPOCD)

We find that Lyme's draft POCD is generally consistent with the goals of the RPOCD but offer several suggestions for the consideration of the Commission.

The four overarching themes of the RPOCD include Sustainability, Community, Innovation, and Connectivity. These themes build toward the state's growth management principles by encouraging growth to occur in existing activity centers with access to infrastructure. Recognizing that each municipality in the region is unique, it is assumed that each activity center will be context-sensitive in scale and character while incorporating a variety of housing types affordable for people with different incomes and needs.

Sustainability
The RPOCD Future Land Use Map identifies Lyme almost entirely as a Priority Sustainability Area – an area with a high correlation of features such as Primary and Connecting Regional Wildlife Habitat and Natural Resource Protection Corridors, Protected Open Space, Public Water Supply Watersheds, and Flood Zones. This designation recommends that sustainable land uses and

policies be a high priority for the area to ensure the protection and preservation of natural resources for future generations. It reflects the importance of Lyme's environmental resources to the greater region and aligns with Lyme's goal of protecting and preserving the town's natural resources, rural landscape, and farmland. Given the importance of the environmental resources in Lyme, to the exclusion of other priorities, stronger language regarding the acquisition, permanent preservation, and stewardship of open space would be appropriate.

Community

The RPOCD recognizes that even the most rural towns in the region need greater housing variety and affordability. To that end, the Future Land Use Map indicates a few small Lower Intensity Community Areas in Lyme. These are places that are most suitable for the expansion of residential development, supportive services, and infrastructure of a scale and type consistent with community needs. Because of the relative lack of infrastructure and services currently in Lyme and the large quantity of important environmental resources, the RPOCD envisions only a modest increase in housing. Although Lyme's plan does not have a goal specific to housing diversity or affordability, the narrative indicates an intent to explore affordable housing options that are compatible with a rural, low-density environment through its Affordable Housing Commission. While this is technically consistent with the goals of the RPOCD, it should be noted that, regardless of survey responses, Lyme will continue to struggle with the provision of affordable housing if it does not explore less costly alternatives to large-lot, low-density, single-family units. In addition, large-lot, single-family dwelling units may not be well-suited to the 88% of survey respondents who place a high priority on their ability to age in place, even if that is the preference.

Innovation

Although Lyme was not highlighted in the RPOCD as a place for increased economic development, Lyme's goal of fostering the economic viability of small farms with things like farm stores and farm stands is consistent with the RPOCD and appropriate for the context in Lyme. Likewise, maintaining the current levels of local serving tradespeople and service providers, and permitting people to work at home are context-appropriate economic development options.

Connectivity

The Connectivity theme in the RPOCD is focused on the importance of multimodal connections between key points in the region and, at a smaller scale, within town and village centers. While there are no priority regional corridors that run through Lyme, there are opportunities for improved pedestrian and bicycle connections for residents and visitors. Lyme's goal of supporting limited government services and amenities may be consistent with this goal, given the plans references to pedestrian and bicycle safety and speeding vehicles. However, this should be written with greater clarity. In addition, Lyme's POCD relies heavily on the majority opinion from the survey to conclude that respondents prefer to drive to their destinations and do not want to invest in alternative modes of transportation or additional services in town. It is important to note that this analysis does not account for subsets of the population who do or will need improved multimodal transportation. Stakeholder interviews indicated that improved access to food and services is needed, particularly for current and future seniors. However, this is not reflected in the majority of survey responses and so was not incorporated into Lyme's recommendations. The same is likely true of the needs of other minority groups, for example, the 11 volunteer emergency service providers permitted to take the survey. An analysis of the

minority survey responses and how they will be accommodated would better inform the plan recommendations and reflect the full spectrum of community needs.

Consistency with the 2025 – 2030 Connecticut Conservation & Development Policies Plan

We find that the goals established in Lyme's draft POCD are generally consistent with the state POCD.

The four guiding principles of the state POCD include being Sustainable, Equitable & Just, Vibrant, and Resilient. Lyme's POCD aligns closely with the state plan's goals of conservation of natural resources, protection of open space, historical and cultural resources, and support of agriculture. Conversely, the two plans see weak alignment in the areas of housing, transportation, and economic growth, with the state favoring expansion of housing and transportation diversity, encouraging compact, mixed-use development near existing infrastructure, and walkable economic centers.

The state Locational Guide Map indicates that Lyme has only a few small rural activity areas - traditional village centers and other nodal areas of activity within less developed regions of the state as well as clusters of civic, cultural, and some commercial uses in relatively small geographic areas at less concentrated levels. The state POCD does not envision Lyme as a center for high levels of economic or housing growth, and, for the reasons discussed in the RPOCD analysis above, Lyme's POCD aligns with the level of growth envisioned. However, the same comments regarding potential improvements also apply.

Consistency with other municipal plans

The RiverCOG region comprises communities with similar goals, demographics, and needs, causing the POCDs of the municipalities within the region to be fairly consistent. However, a comparison of future land uses amongst bordering towns is important to ensure that no competing future uses near town boundaries are proposed. A key mechanism for comparison is typically that of a future land use map, which is not included in either Lyme or Old Lyme's POCDs. East Haddam's future land use map shows intent only for open space or rural residential uses in areas near Lyme, demonstrating consistency.

POCDs of the neighboring towns of Old Lyme, East Haddam, Chester, Essex, and Deep River, include similarly stated goals to Lyme, particularly those of open space preservation and conservation of natural resources.

Other general comments

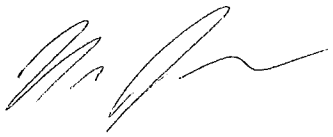
Section 8-23 of the statutes outlines items that shall be included in municipal POCDs. One such requirement is a map showing the proposed locations for future land uses, including land for residential, recreational, commercial, industrial, conservation, agricultural, and other purposes. It appears that Lyme intends its current zoning map to serve this purpose; however, a future land use map and zoning map are not the same. A future land use map is a representation of the future vision of the community, indicating areas where the town would like to see specific uses occur over the 10-year life of the plan. It is a policy document. A zoning map is an implementation of the future land use vision, specifying the development standards currently in

effect. It is a regulatory document. A future land use map is the benchmark to measure proposed zoning changes over the next ten years against as the Commission asks, "Does the proposed change further the vision in the POCD?"

In addition, although not required by statute, municipalities may include programs for the implementation of goals in the POCD. Lyme's plan does not include implementation steps, timelines, or responsible parties for any of its goals, which are vague and broadly stated. It is therefore difficult to understand what the intended actions are, how the goals will be accomplished, and what success will look like. We recommend establishing a clear plan of action as part of the POCD process so that implementation steps can begin upon plan adoption. This can help in furthering Lyme's vision for its next ten years.

Thank you for the opportunity to comment on the draft POCD. If the Commission has any questions regarding this review or any other land use issue, please don't hesitate to contact us at 860-581-8554.

For the Committee,



Megan Jouflas, Deputy Director

Dear Planning and Zoning Commissioners:

I am writing to suggest additional language be added to the POCD regarding PA490 Open Space.

According to CGS §**12-107e. Classification of land as open space land.** *(a) The planning commission of any municipality, in preparing a plan of conservation and development for such municipality, may designate upon such plan areas which it recommends for preservation as areas of open space land, provided such designation is approved by a majority vote of the legislative body of such municipality. Land, or a portion thereof, including any terrestrial recreational trail corridor that meets the criteria for designation as a greenway pursuant to chapter 454, included in any area so designated upon such plan as finally adopted may be classified as open space land for purposes of property taxation or payments in lieu thereof if there has been no change in the use of such area which has adversely affected its essential character as an area of open space land between the date of the adoption of such plan and the date of such classification.*

In May 1967, the Assessment Study Committee for the Town of Lyme presented their findings and recommendations regarding PA490 Open Space at a Town Meeting. It was recommended that the Planning and Zoning Commission designate in its Plan of Development as open space land all undeveloped land .....

In September 1969, the Planning and Zoning Commission proposed an addition to the Zoning Regulations, 3.19 Open Space Land. Pursuant to provisions of Section 12-107e of the Connecticut General Statutes, as amended, all farm land, forest land, and land which is not presently built upon or included under an approved subdivision plan, is designated as open space land.

It appears that this language was never actually added to the Zoning Regulations. It is more appropriate to add language to the POCD per the statute, and then adopt an ordinance to further lay out the qualifications that need to be met to classify land as PA490 Open Space.

In order to effectively administer the Open Space Designation for Lyme, I am requesting the Planning and Zoning Commission include language in the POCD designating the land available for classification and include language which clarifies the difference between Town owned open space and PA490 open space. I would also ask that a recommendation be added in the POCD to create a subcommittee to develop an ordinance to further identify the requirements for eligible properties. I would be happy to be a part of any drafting committee.

I have included copies of the OPM PA 490 Recommended Land Use Values and Best Practices Guide as well as a copy of the 1969 approved proposed language.

I would ask that you consider the following language or similar:

Pursuant to the provisions of Section 12-107e of the Connecticut General Statutes, as amended, all land not presently built upon that is in excess of the minimum zoning requirement for area is eligible for open space designation.

Respectfully submitted,

Jennifer Thomas, CCMA II
Lyme Assessor

Outlook

Affordable housing and the POCD

From tina west <tinawestct@yahoo.com>
Date Wed 11/12/2025 3:31 PM
To Lannie Mossberg - Lyme Zoning Clerk <zoningclerk@townlyme.org>

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As a member of the Affordable Housing Commission for 32 years, I have seen the Town struggle with how to do affordable housing practically and fairly. As land and building costs have skyrocketed over the period our original model of single-family houses on conforming lots has become ridiculously expensive. It's also become clear that the Town does not want to manage rental housing.

The change to permit more ADUs and accessory dwellings is very positive but it's not clear how much of the new housing will be "affordable" by the state's definition.

It is clear that many people in Town want total control over affordable housing in Lyme but do they realize that this means that the Town takes on 100% of the cost and management?

I think the scares over the special permit process under consideration by P&Z are exaggerated. We could have reasonable control and financial support from the state and other sources.

Respectfully, Tina West

Sent from Yahoo Mail for iPad

Subject: Comment on Data Methodology, Terminology, and Survey Framing in the 2025 Draft Plan of Conservation and Development

To: Members of the Lyme Planning & Zoning Commission
From: Caitlin Carnevale
Date: November 3, 2025

Dear Members of the Lyme Planning & Zoning Commission,

I would like to thank the Commission for the significant effort and thoughtfulness that went into preparing the 2025 Plan of Conservation and Development (POCD) and the accompanying community survey. The draft report reflects a deep commitment to Lyme's conservation values and the careful stewardship of its rural character.

In reviewing the draft POCD and its supporting survey data, I would like to offer several observations and recommendations regarding (1) the definition of service providers, (2) the interpretation of the weighted averages used in the report, (3) the methodological limitations of relying solely on weighted averages to inform planning decisions, and (4) the directional framing of survey questions related to affordable housing. My intent is to ensure that future iterations of the plan and accompanying data analysis reflect the full nuance of community sentiment and maintain the highest standards of analytic rigor and neutrality.

1. Clarifying the Definition of Service Providers

The POCD's recommendation to "consider regulations that support local tradespeople, certain essential service providers, and farm stores" invites important questions about its underlying rationale. In the community survey, the term *service providers* was not explicitly defined, leaving respondents to interpret it variably in terms of both the nature and scale of operations—ranging from individual tradespeople working independently to more formal or commercial enterprises. This definitional ambiguity may have influenced survey responses and, by extension, the conclusions drawn from them.

Equally important—and perhaps more consequential—is the apparent absence of consideration for the potential locations of such service providers within the town. The suitability of specific areas for commercial or mixed-use activity—particularly in relation to existing infrastructure, traffic patterns, and the preservation of Lyme's rural character—is central to planning and zoning deliberations. Without addressing potential siting or locational criteria, discussions about "supporting" or "allowing" certain services remain incomplete and may lead to differing expectations among residents, applicants, and decision-makers.

Given these gaps, the current recommendation appears premature as a policy directive. Until there is clearer evidence of community consensus and a more precise understanding of what types of service activities are appropriate to Lyme's rural character, it would be prudent to reconsider or defer this recommendation. Proceeding without such clarification risks unintentionally expanding commercial activity in ways that could undermine the conservation-based principles at the heart of Lyme's POCD.

To ensure clarity and consistency in both policy formulation and regulatory application, I recommend that future planning documents and community surveys:

- Include clear and explicit definitions for terms such as *service providers*, specifying the types of activities and scales of operation encompassed; and
- Incorporate consideration of appropriate locational contexts within the town where such services might be permitted, encouraged, or restricted.

By addressing these foundational elements at the definitional and locational stage, the Town can better prevent misinterpretation, guide zoning deliberations more effectively, and ensure that any future regulatory changes align with both the community's intent and Lyme's enduring conservation and land-use principles.

2. Limitations of Weighted Averages in Interpreting Survey Data

The survey results summarized in the POCD rely heavily on weighted averages as the principal measure of community opinion. While weighted averages are a convenient means of condensing survey responses into a single metric, they have notable analytical limitations that merit discussion.

Weighted averages obscure the distribution of responses. For instance, Question 11 on page 46 of the POCD (regarding "local tradespeople and service providers") yields a weighted average suggesting moderate support; but when examining the underlying percentages, nearly one-quarter of respondents expressed limited support or opposition. This illustrates how a single averaged value can mask polarization within the community or imply a false sense of consensus.

For example, although the weighted average score for local tradespeople and service providers was 3.18, approximately one-third of respondents (33.53%) were neutral, nearly one-quarter (24%) expressed opposition or limited need, and only 9.78% identified this as a high priority. This distribution reveals a more divided community perspective than the average alone implies, underscoring the need for more granular interpretation of the survey data.

When percentages and frequency distributions are considered alongside weighted averages, a more accurate and representative picture of community sentiment emerges. Averages alone cannot reveal whether opinions are tightly clustered, widely dispersed, or bimodally divided. For planning purposes—where policies impact diverse groups differently—such detail is essential.

3. Methodological Cautions for Policy Application

From a data science and public policy perspective, reliance solely on weighted averages introduces several risks:

- **Loss of nuance:** Aggregated data can conceal minority viewpoints and the intensity of disagreement.

- **Lack of demographic differentiation:** Without cross-tabulation by age, geography, or other variables, the town cannot identify whether specific subgroups feel differently about key issues.
- **Potential misalignment with qualitative feedback:** Excluding open-ended comments eliminates context that often explains why respondents hold certain views.

A more robust analytical framework would incorporate the full response distributions, demographic segmentation, and qualitative responses. This multidimensional approach not only strengthens the statistical validity of findings but also ensures that resulting policy decisions align more closely with the community's diverse perspectives.

4. Directional Framing of Affordable Housing Survey Questions

Appendix A of the POCD includes several questions related to affordable housing that are directionally framed toward support for expansion. For example, prompts such as "How important is it to increase the availability of affordable housing in Lyme?" presuppose that increasing availability is a desired policy objective. This structure limits the opportunity for respondents to indicate that such expansion may not be a priority or to express reservations regarding density, infrastructure, or fiscal impacts.

While Connecticut General Statutes §8-23 requires municipalities to address housing opportunities, surveys can still be crafted to ensure bidirectional neutrality. A more balanced approach might ask:

"Should affordable housing in Lyme be encouraged, maintained at current levels, or discouraged?"

Such phrasing invites a full range of opinions, thereby yielding data that more accurately reflects the community's collective perspective.

Conclusion

In summary, I respectfully urge the Commission to:

- Re-examine—and, if necessary, defer or remove—the recommendation to "consider regulations that support local tradespeople, certain essential service providers, and farm stores" until clear definitions, scales of operation, and locational contexts are established and verified as consistent with Lyme's conservation priorities;
- Clarify and define key terms such as *service providers* in future survey instruments and planning documents;
- Incorporate consideration of where such services might appropriately be located within the town;
- Supplement weighted averages with full response distributions and demographic cross-tabulations when analyzing community survey results;
- Incorporate qualitative feedback to capture context and minority viewpoints; and

- Ensure future surveys are neutrally worded to accurately represent the full spectrum of community opinion.

These enhancements would not only improve the analytic integrity of the POCD but also strengthen public trust in the planning process by ensuring that every resident's perspective is equitably represented.

Thank you for considering these observations and for your ongoing commitment to transparent, data-driven community planning. I would welcome the opportunity to discuss these points further or to assist in refining the survey methodology for future planning efforts.

Respectfully submitted,
Caitlin Carnevale
Lyme Resident

To the Lyme Zoning Commission,

My name is Steve Deveaux, I am the owner and founder of Deveaux Lawn and Landscape located on Beaver Brook Rd and I am a service provider in the town of Lyme. My company works for well over 100 families in Lyme, the Lyme Land Trust, the Congregational Church, the Hamburg Fair, the Hamburg Cove Yacht Club, the Public Hall and the Town of Lyme itself.

I would like to briefly comment on the POCD section about tradespeople and service providers, and discuss some critical details that were left out of Ms. Carnevale's letter. A copy of her letter was sent to the Lyme RTC which i am a member, and is where I received a copy of it. On Question 11, where the POCD asks do the town residents want additional tradespeople, to clarify, Ms. Carnevale's letter says 33.5% of respondents were "neutral", however the response category is actually titled "Currently the right amount/no opinion". The "neutral" term used in the POCD does not refer to a specific response category but rather to the weighted average of 3 which the tradespeople category was above at 3.18.

Additionally, what was completely left out of Ms. Carnevale's letter was that another 33.5% of respondents actually replied that more tradespeople and service providers would improve our town! And as noted, an additional 9.8% saying to make this a priority which is the highest percentage of all the subsections in Question 11. Combining these 2 clear positive responses shows over 43% of the people saying we need more tradespeople and service providers, while 33.5% saying what's existing is fine. It should also be noted that 11.2% responded that there is additionally a "limited need" for more service providers. I do not feel this category can actually be combined with the "don't want" category as Ms. Carnevale's letter portrayed the data to show. I believe those are 2 totally different view points and should remain separate.

Again, I just wanted to clarify Ms. Carnevale's letter and interpretations made of Question 11 as some rather important details appeared to be selectively omitted; all while claiming to stress the need for transparency and clarity. Finally, in the POCD "Critical issues" section, it does conclude that Lyme's residents wanted to restrict future economic development, however, residents are in support of local tradespeople and service businesses as the data shows.

Lastly, Lyme's aging population has an ever growing need for service providers and no one wants to hire out of town workers; people want to hire local. Local is more efficient and usually costs less due to the proximity of a business to its customer base. More importantly, when you don't use local businesses, you also get contractors coming into town who don't follow local zoning and wetlands laws. By not living here, they therefore don't understand the consequences that their actions may have on conservation which seems to be a cornerstone of our community.

Respectfully submitted,

Steve Deveaux

Outlook

POCD comments

From David Potts <DPotts@geomatrixllc.com>
Date Wed 11/12/2025 6:37 PM
To Lannie Mossberg - Lyme Zoning Clerk <zoningclerk@townlyme.org>

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Thank you for the opportunity to comment on the POCD (plan). A focus of the plan is open space. While I personally value open space, it is important to recognize that it also increases property values; consequently displacing the younger generations. The plan should anticipate this and provide a mechanism to offset it. This could be from creating areas where smaller lots are allowed, or similar strategies. This will ultimately benefit the town by allowing those who can provide benefits to the community to live in town.

Another consideration with respect to open space is how this open space is utilized. The Lyme Land Trust published information that claimed that because of Lyme's open space we have among the lowest population density/sq mile in the area. They went on to expound on the many ancillary benefits to the area that this provides.

However, in the same document, it invited all to come use these properties free of charge; not just land trust members or town residents. It is important to recognize that encouraging people to come into town and frequent our open spaces, in part or whole, can negate the environmental benefits that this open space creates. It also results in costs that the taxpayers have to bear. This should all be considered in the plan.

The commission should further consider the impacts to wildlife that people in open space create. There have been many studies that have shown negative effects associated with people sharing space with wild animals. This is especially true during stressful times, but never a benefit for the animals. These properties historically did not have anywhere near the numbers or visitation frequency of people on them that now exists.

The commission should consider the impacts of densely placing trails and encouraging people to frequent these open spaces. Limits must be imposed. At a minimum, the formation of sanctuary areas should be required. The wildlife of Lyme deserves better.

Thank you.

Respectfully submitted,
David Potts

100-2 Joshuatown Rd.
Sent from my phone. Please excuse any errors...