

PLANNING & ZONING  
COMMISSION



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Salisbury Inland Wetlands and Watercourses Commission  
P.O. Box 548  
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Salisbury, CT 06068

Dear Commissioners,

The Planning and Zoning Commission (PZC) in reviewing the draft regulations of the Inland Wetlands and Watercourses Commission (IWWC) offers the following comments for your consideration as you review, update, and revise your regulations. We support your efforts and look forward to a continued and strengthened collaboration, integrating our respective authorities as they pertain to the stewardship of Salisbury’s rich and diverse wetland resources. While we recognize that there will be a public hearing to adopt these regulations at some future date, the PZC thought it best to share our thoughts on the draft regulations by providing the following comments to you now. The PZC also reserves the right to provide additional comments during the public hearing process on the adoption of revised regulations.

The PZC must prepare, adopt or amend a Plan of Conservation and Development (POCD) for the Town of Salisbury at a minimum every ten years. In accordance with 8-23 of the Connecticut General Statutes this plan includes the PZC’s land use recommendations for residential, industrial and commercial development, recreation and conservation. These recommendations are guided by State and Regional POCDs, local knowledge and feedback received through a number of public input workshops. The current POCD is due for an update in 2022 and the PZC is in the beginning stages of initiating that process. However, much of the 2012 document is still pertinent to your regulation rewrite. The concluding section of the POCD outlines how the POCD should be implemented establishing strategies and assigning these strategies to local organizations as leaders and/or partners.

The PZC respectfully requests the IWWC consider the below identified strategies and tasks assigned to the Conservation Commission (now IWWC) with regard to the draft regulations. Further, the PZC encourages that the IWWC work with other organizations to protect important wetland resources. We also recognize that portions of certain strategies and tasks would fall outside of the IWWC’s purview and/or are tangential to your authority. This underscores the importance of the IWWC partnering with other town agencies (e.g., PZC and CC) and organizations to achieve these goals.

*Note that, strategies and tasks not under the purview of the IWWC have been omitted – See the Salisbury Plan of Conservation and Development (2012) for complete details.*

Strategy	Preserve Natural Resources	Leader	Partner	Priority Status
A	Minimize or avoid wetland disturbance and filling	Yes		1
B	Protect floodplains from development and inappropriate uses		Yes	1
D	Preserve vernal pools and associated upland habitat	Yes		1
E	Maintain ecological connectivity between upland and wetland habitats		Yes	1

F	Protect wildlife corridors		Yes	1
G	Protect groundwater resources	Yes		1
H	Minimize stressors that degrade river, streams and wetlands	Yes		2
I	Encourage the use of native plants		Yes	1
J	Encourage wetlands and riparian (riverside and lakeshore) restoration	Yes		2
K	Work with other organizations to protect important resources		Yes	2
M	Develop strategies to educate decision makers and the public and increase ecological literacy	Yes		2
O	Continue to educate the public about control of invasive and over-abundant species, such as invasive landscape plants that colonize woodlands and zebra mussels which have spread to Twin Lakes and to the Great Falls area of the Housatonic River	Yes		2
P	Inform potential applicants regarding required environmental studies		Yes	2
Q	Use third party reviews when beneficial		Yes	1

Task	Preserve Natural Resources	Leader	Partner	Priority Status
1	Consider adopting regulations to encourage the implementation of LID storm water management		Yes	1
3	Consider protective measures for ridgelines and steep slopes		Yes	1
4	Inventory, assess and map vernal pools	Yes		1
7	Establish programs to encourage voluntary wetland and stream-bank restoration and stabilization	Yes		2
10	Increase ecological literacy among land-use decision makers and the public	Yes		2
13	File reports of Salisbury's Inland Wetlands Authority decisions with the CT DEEP	Yes		1
14	Encourage communication between the Conservation Commission (IWWC) and the PZC		Yes	1

The PZC recommends that the IWWC continue to implement the strategies and tasks identified in the POCD. Despite the age of the Plan, many of these items remain pertinent. Strategies P and Q, and Tasks 13 and 14 are actively being addressed by the Land Use Office. However, the regulation rewrite affords an opportunity for the IWWC to take concrete action on the priorities assigned by the POCD.

The following strategies can be accomplished by increasing the minimum upland review area which would enable the Commission to take a broader look at the impacts of regulated activities:

- Minimize or avoid wetland disturbance and filling
- Preserve vernal pools and associated upland habitat
- Maintain ecological connectivity between upland and wetland habitats
- Protect wildlife corridors [as they pertain to wetland-dependent wildlife].
- Minimize stressors that degrade river, streams and wetlands

The following strategies and tasks can be accomplished by evaluating and implementing best management practices when reviewing and permitting applications for regulated activities:

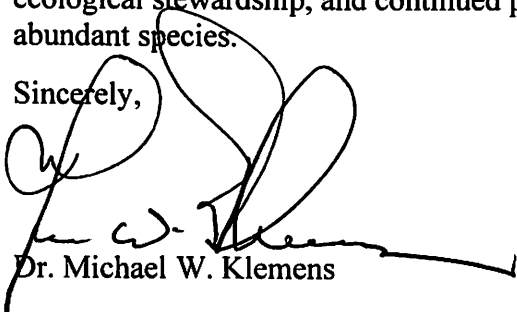
- Minimize or avoid wetland disturbance and filling
- Preserve vernal pools and associated upland habitat
- Maintain ecological connectivity between upland and wetland habitats
- Protect wildlife corridors [as they pertain to wetland-dependent wildlife].
- Protect groundwater resources
- Minimize stressors that degrade river, streams and wetlands
- Encourage the use of native plants [in and around wetlands (i.e., vegetated buffers).]
- Encourage wetlands and riparian restoration
- Work with other organizations to protect important resources
- Encourage the implementation of LID stormwater management
- Consider protective measures for ridgelines and steep slopes [as they pertain to the protection of wetland resources]

The PZC recommends that the IWWC consider a 300-foot upland review area for Salisbury's four large lakes mirroring the PZC's regulatory Lake Protection Overlay District. With the Land Use Office working with both commissions and the same third-party consultants reviewing projects for both IWWC and PZC, it makes sense that both agencies review the same area. This makes not only good administrative sense, but most importantly, ecological sense.

The PZC also recommends that the IWWC consider defining terms frequently used in Salisbury including but not limited to: wetland buffer (as distinct from the URA), calcareous fen, vernal pool, headwaters, submerged lands, and intermittent watercourse. Also, contrary to the Federal definition, Connecticut defines wetlands based on soil type, so shouldn't the term soil scientist be revisited to reflect the requirement that a soil scientist be certified in Connecticut?

Finally, the PZC recommends that the Board of Selectmen work with the Land Use Office to develop strategies to recruit and educate decision makers and the public, as well as to increase overall ecological literacy. With the creation of independent Conservation and Inland Wetlands and Watercourses Commissions, arises an opportunity to assign certain tasks to the newly-created Conservation Commission. These tasks include preserving natural resources by fostering ecological literacy, ecological stewardship, and continued public education concerning the control of invasive and over-abundant species.

Sincerely,



Dr. Michael W. Klemens

on behalf of the Salisbury Planning and Zoning Commission (approved by unanimous vote  
7/19/2021)