

Williams, Amelia

From: Balint, Marcy <Marcy.Balint@ct.gov>
Sent: Wednesday, December 28, 2022 9:11 AM
To: Williams, Amelia
Subject: CT DEEP LRWD Comments on Coastal Site Plan Review for 17 East Beach Drive, Norwalk CT
Attachments: Coastal Hazard Areas FS.pdf; Residents Guide to Low Impact Development (2).pdf; FEMA NFIP V and A Requirements.pdf; FEMA NFIP Lowest Floor.pdf
Importance: High

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Norwalk Planning and Zoning Commission
c/o Amelia Williams, Land Use Planner
125 East Ave.
Norwalk CT 06856

December 28, 2022

Re: CT DEEP LWRD Comments on Coastal Site Plan Review application for 17 East Beach Drive, Norwalk CT

Dear Commission Members:

Thank you for the opportunity to comment on the above-referenced coastal site plan review (CSPR) application received by the Land and Water Resources Division (LWRD) on December 1, 2022. The proposal to add an addition to an existing home, with both being built to AE 15 FEMA NFIP standards at a non waterfront site. Our office has reviewed the project for consistency with the goals and policies of the Connecticut Coastal Management Act (CCMA) and offers the following comments.

LWRD generally supports raising existing and attached new additions to meet these FEMA and NFIP standards as proposed. However, the addition appears considerable in living area increase over current, on a small lot of .175 acre and within a flood prone zone. While meeting

FEMA standards is important, it is no guarantee the home and new addition will survive over time. This is especially true in an age of increasing and dynamic climate change uncertainty, severe storm, wind, and precipitation events and in an age of sea level rise. Also, Belle Island relies solely on two points of access as limited evacuation routes and is otherwise surrounded by wetlands and water. East Beach Drive immediately to the west of the site is 5.67 NAVD which is well below the 1988 USACOE flood profiles prediction with over 3 feet of flood water over the road anticipated during a 10-year frequency Tidal Flood event (9.2 NAVD88), rendering dry evacuation access a significant potential challenge.

The Commission must determine whether granting an approval to for a larger new residence, even when built to FEMA NFIP standards as required, will result in a significant exposure of life and property to flood hazards and will knowingly put more people in harm's way, or if it only marginally adds to such exposure in light of the already developed nature of the surrounding area. Consistent with CCMA flood hazard policy to "minimize threats to life and property" which goes beyond NFIP construction compliance, we generally recommend that significant expansion of living space not be allowed in flood prone areas, especially on in areas where dry evacuation during flood events is problematic. Beyond that, we recommend all aspects of FEMA NFIP construction compliance be assured. See FEMA and Coastal Hazard fact sheets attached for more information. (See fact sheets attached for more information).

In accordance with DEEP's Stormwater Manual and Low Impact Development principals, we do not support overflow due to increased coverage at the site be directed to street catchbasins, but that any increased overflow volumes be treated and maintained within the property itself to the maximum extent (Cultec system sized accordingly, with additional LID as necessary). See additional LID information attached for more options.

While the application notes that preservation of natural vegetation will be provided to the maximum extent practicable, the increased impervious coverage relative to this small lot is considerable, and the CSPR application does not specifically note or provide measures to protect the five mature trees on the site, which also provide shade for the public way ie., Foster lane to access the waterfront park area. This discrepancy should be clarified and non-invasive trees saved, to maximum extent possible.

We hope these comments prove useful to the Commission . These comments are offered in accordance with CGS Section 22a-90 thru 22a-112, inclusive and do necessarily reflect other planning, zoning or ZBA considerations which may apply. If you have any questions about this or any other coastal management matter, please feel free to contact me by phone at (860) 424-3623 or by email at Marcy.Balint@ct.gov. Thank you.

Sincerely,

Marcy L. Balint, Sr. Coastal Planner
Land and Water Resources Division

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