



Connecticut
**Department of Energy &
Environmental Protection**

To: Old Saybrook Zoning Board of Appeals
2024

April 9,

c/o Chris Costa, Town Planner

From: Marcy L. Balint, Sr. Coastal Planner, CT DEEP, LWRD

Re: CT DEEP LWRD Comments on Coastal Site Plan Review application for 201
North Cove Road, Old Saybrook CT

Dear Board 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 February 21, 2024. The proposal includes variance requests including from the Gateway 100-foot setback to add two new additions, a deck, new pool, replace the septic system, and also apparently modify home to be FEMA compliant. 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. Diane Ifkovic of this office has also reviewed the plans.

The GFA would be reduced from 6,610 SF to 5,395 SF. Therefore, the usual CCMA issues regarding increased residential density within a flood hazard area potentially increasing threats to life and property do not apply with living space increases, which is good.

Regarding proper FEMA NFIP construction, the application notes “modify home to be FEMA compliant” with a specific note regarding lower-level compliance, but we recommend all aspects of NFIP construction be confirmed and clearly noted. It appears the basement may be filled in and/or flood vents provided but all aspects should be clearly noted. We recommend the First Floor Elevation (FFE) be noted on the site plan to conform with AE10 requirements as well.

The VE15 Velocity flood zone line runs thru the deck, but a notation that this will be free standing (not attached to the home) is apparently noted, and therefore as such, will not pull the entire house and renovations into the FEMA Velocity zone

requirements (on pilings to BFE 15 plus, with break away walls beneath BFE). Note #10 on the site plan details plans to keep mechanicals out of VE14 and use flood resistant materials below BFE otherwise, which is good.

As a reminder, no utilities can be placed below BFE. There is an existing mechanical room shown on the site plans but also a note that the mechanicals will be above BFE in this room. A built-in BBQ is proposed and noted on the plans on the ground in the back and it is unclear if this electric or gas. Please be reminded that any utilities servicing the BBQ need to be floodproofed, anchored in place, and be able to be submerged and still be operational.

Further, we understand the Gateway's 100-foot setback is not being met for the pool (86 feet) and terrace (78 feet) and we recommend options to maintain this setback be fully considered, to maximum extent feasible. Tidal wetlands are located adjacent, extremely biologically productive, and worthy of our utmost protection. Even with some removal of impervious, coverage is increasing from 9.9 to 13.8 percent. We note plantings with additional native riparian type buffer areas are proposed perhaps to compensate for not meeting Gateway standards. Riparian buffer areas designed well have been shown to be highly effective in protecting wetlands when placed adjacent and downhill from disturbed areas and providing edge wildlife habitat.(See Fact Sheet attached).

Finally, this area appears located within DEEP's NDDDB area (Natural Diversity Database) which represents the potential for endangered, threatened or state listed species to occur in the vicinity, and the Board may wish to ask the applicant to further evaluate, what if any species exist potentially at this location, with measures to avoid and mitigate any potential impacts at this location. Email to reach the NDDDB is deep.nddbrequest@ct.gov

We hope these comments prove useful to the Board, which 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,

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