



September 16, 2025

Stamford Planning Board  
c/o Lindsay Cohen, Associate Planner  
888 Washington Blvd.  
Stamford, CT 06904

**Subject: 2025-2035 Comprehensive Plan Review**

Dear Board Members:

Thank you for notifying this office of the draft City of Stamford 2025-2035 Comprehensive Plan. The Connecticut Coastal Management Act (CCMA) requires our office to review the Draft for consistency with the policies and standards of the Connecticut Coastal Management Act (CCMA), specifically Connecticut General Statutes (CGS) Section 22a-104(e) and the criteria of CGS Section 22a-102(b).

The draft Plan is visually appealing, easy to navigate, and contains many noteworthy sections that we support. For example, the *Sustainability Today* section from pages 20 to 23 highlights the City's efforts to invest in its environment including the publication of its Climate Action Plan and ongoing work on the Coastal Flood Resiliency Plan. The section also outlines the City's intention to prioritize nature-based stormwater management through green infrastructure and to develop and enact the Coastal Flood Resiliency Plan. This section states that the community identified controlling flooding with green infrastructure as a top priority. We also strongly support language on page 48 that identifies "flood risk" as a factor the City will consider, along with existing infrastructure and transit service, when determining where land can accommodate development. This is important as the Plan shows that Stamford is expected to experience population growth faster than peer cities, and development to accommodate such growth should proceed in a manner that is safe for the community.

The section titled *A Healthy City* further highlights the efforts the City intends to make to improve climate resilience, including upgrading both physical infrastructure and community networks to better adapt Stamford to its most pressing climate risks, including flooding and sea level rise. Controlling flooding with green infrastructure is identified as a top community priority. Further, the section outlines Stamford's plans to implement an Upland Resilience Overlay to minimize water runoff and reduce flood impacts from upland development, and a Coastal Resilience Overlay (CRO) Zone within the Coastal Area to ensure that new development and redevelopment are elevated at least 3 feet above base flood elevation.

We support the incorporation of these tools as they are a great and innovative opportunity to protect people and property from flood hazards and add requirements such as stormwater management and salt-tolerant landscaping, as identified on page 97, to further reduce risks and adapt to climate impacts and rising sea level.

However, Section 22a-92(b)(2)(F) of the CCMA requires municipal land use authorities to manage coastal hazard areas so as to ensure that development proceeds in such a manner that hazards to **life** and property are minimized. Elevating structures 3 feet higher than the base flood elevation is one approach to managing flood hazard areas, but limiting high-density residential development in flood-prone areas is a coastal management strategy that avoids impacts by not placing people in harm's way in the first place. Again, we recognize that the Plan does mention "flood risk" as a factor in determining where land can accommodate development, but we strongly recommend that any recommendations pertaining to high density residential-type development, such as ST-13.11 to revise building codes for flexibility by updating them to encourage "Reversible Building Design" to allow easier conversion between commercial and residential uses, also include a caveat that stresses that residential development/conversions should be limited to sites that are located outside of coastal flood hazard areas and/or can provide dry egress for evacuations and access for emergency personnel.

We also note that, unlike the current, previously approved Master Plan, the draft Comprehensive Plan does not include specific goals for the promotion of water-dependent uses at waterfront sites or the protection of tidal wetlands or other sensitive coastal resources. The current Master Plan includes sections that highlight goals such as;

- Protecting, enhancing, and promoting water-dependent uses;
- Protecting water-dependent industry;
- Requiring public access in conjunction with non-water-dependent uses;
- Protecting coastal lands by conserving and enhancing natural coastal resources in the Stamford Coastal Management Area, including beaches, rocky shorefronts, estuarine embayments, shellfish concentration areas, tidal wetlands, intertidal flats, coastal hazard areas, and other resources; and
- Maintaining tidal wetlands in their natural state and emphasizing the value of tidal wetlands in the East Side and West Branch areas.

Therefore, we strongly recommend that existing relevant policies including *Policy 5C: Encourage Public Access to the South End Waterfront*, *Policy W2.2: Promote waterfront views and access along the West Branch, with a focus on creating continuous public access along the water's edge...*; *Policy 7E: Support an Active and Diverse Waterfront*; *Policy 7F: Maximize public access to the waterfront.*; *Policy 7N: Protect Coastal Lands*, and *Policy 7O: Manage Natural Areas* be incorporated into the draft Comprehensive Plan, especially in sections that outline specific goals for protecting marine and upland ecosystems with specific actions, to ensure that the protection of water-dependent uses including public access and sensitive coastal resources continue to remain top priorities.

Finally, although the draft Comprehensive Plan contains several coastal management-related topics and issues, we note that the draft Plan does not specifically reference the Connecticut Coastal Management Act. As the CCMA is the basis for effective implementation of municipal coastal management and harbor management programs, we recommend that the Comprehensive Plan include general language highlighting goals of the CCMA specifically relating to the three basic tenets of coastal management: protection of sensitive coastal resources and coastal water quality, proper management of coastal flood hazard areas to ensure that hazards to life and property are minimized, and promotion and protection of water-dependent uses, including public access, at waterfront sites. This could be as simple as including a call-out box similar to the box on page 22 describing the Coastal Flood Resiliency Plan.

Thank you again for the opportunity to comment on the draft Comprehensive Plan. We hope these comments are helpful to the Board. Should you have any questions regarding this letter or any other coastal management matter, please feel free to contact me at [braden.lynn@ct.gov](mailto:braden.lynn@ct.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Braden Lynn", with a long horizontal flourish extending to the right.

Braden Lynn  
Environmental Analyst  
Land and Water Resources Division

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