



January 22, 2026

Montville Planning and Zoning Commission
c/o Mr. Dennis Goderre, PLA, AICP CUD
Director
Office of Land Use and Development
310 Norwich-New London Turnpike
Uncasville, CT 06382

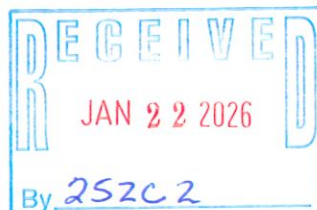
Subject: 25ZC2 Adaptive Reuse Regulation Amendments

Dear Commissioners:

Thank you for notifying the Connecticut Department of Energy and Environmental Protection (CT DEEP) Land and Water Resource Division (LWRD) of the proposed zoning regulation amendments noted above, received on December 11, 2025. Acting as the Commissioner's staff, our office has reviewed the proposed amendments for consistency with the policies and standards of the Connecticut Coastal Management Act (CCMA). We find the proposed amendments consistent with the CCMA, and we offer the following comments for the Commission's consideration.

We support the purpose of the amendments described in section 16.13.1 of focusing development on areas that can support traffic and infrastructure and protecting undeveloped landscapes. In order to also properly manage coastal flood hazard areas to minimize hazards to life and property as required by the CCMA, we recommend that the Commission consider adding a criterion to Section 16.13.5 *Adaptive Reuse Eligibility Criteria* to disallow high density residential uses from FEMA-designated flood hazard areas and/or that such sites be served by dry egress for evacuation of residents and access by first responders. By encouraging development on parcels that are fully suitable for development, the proposed amendments could decrease development pressure in coastal flood hazard areas.

Please be advised that this consistency determination is based on coastal management considerations only and does not necessarily reflect other municipal planning and zoning considerations which may apply. These comments are made in response to the review requirement contained in Section 22a-104(e) of the Connecticut General Statutes, which requires that notification be sent to the Commissioner of Energy and Environmental Protection at least 35 days prior to the commencement of the public hearing. Once notified, our office is responsible for reviewing the proposal's consistency with the policies of Section 22a-92 and the criteria of Section 22a-102(b) of the CCMA.



We hope that the Commission finds our comments helpful. Please contact me at fred.oliver@ct.gov if you have questions about this or any other coastal matter.

Sincerely,

A handwritten signature in black ink that reads "Fred Oliver". The signature is written in a cursive style with a large initial "F" and "O".

Fred Oliver
Environmental Analyst
Land and Water Resources Division

FO/o