



July 17, 2025

Waterford Planning and Zoning Commission
c/o Mark Wujtewicz, Planner
Waterford Town Hall
Fifteen Rope Ferry Road
Waterford, CT 06385

RE: Review of Proposed Zoning Text Amendments for Sections 1 and 6.2.11 and New Section 3.45 - Campgrounds

Dear Commissioners:

Thank you for referring the above-referenced proposed set of zoning text amendments for our review and comment. The zoning text amendments included in this submission to our Office have been proposed by the Applicant, Golden Trails, LLC. Acting as the Commissioner's staff, our office has reviewed the proposed set of zoning text amendments for consistency with the policies and standards of the Connecticut Coastal Management Act (CCMA), and we have the following comments for your consideration.

We note that the RU-120 zoning district has several locations throughout Waterford that contain flood hazard areas. We also note that the existing campground for which this amendment is being proposed to allow expansion into Waterford also contains several existing campsites located within FEMA Zone AE. However, the proposed new Section 3.45.6, Accessory Uses, does not make any mention with respect to compliance with FEMA National Flood Insurance Program (NFIP) and local floodplain management requirements for the construction and location of any permanent structures within floodplain areas of a campground.

In addition, proposed new Section 3.45.7 governing Storage would allow the following:

Occupied recreational camping vehicles may be stored in campgrounds. Campgrounds shall not be subject to the provisions of Section 3.22 of these Regulations.

Section 22a-92(b)(2)(F) of the CCMA requires the Planning and Zoning Commission to manage coastal hazard areas to ensure that hazards to life and property are minimized. Per FEMA's NFIP minimum floodplain management requirements, the storage of RVs is prohibited in 100-year floodplain/special flood hazard areas (SFHA) for more than 180 days. In addition, the vehicles have to be "road-ready" and be able to be removed from the floodplain/SFHA in advance of a potential flood event occurring.

Since the proposed zoning text changes apply to all areas zoned RU-120 within the Town and are not parcel specific, the proposed regulations need to ensure that any property zoned as RU-120 and proposed for use as a campground comply with all FEMA NFIP and local floodplain management requirements with respect to the location and construction of all permanent and temporary structures (e.g., anchoring, etc.), and the location, placement, and storage of RVs within FEMA delineated SFHAs on said property.

Accordingly, DEEP recommends adding language to the Special Permit criteria contained in this proposed new section that would require compliance with all FEMA and additional local floodplain management regulations for permanent structures proposed for location within a SFHA and those governing the storage of recreational vehicles within FEMA delineated SFHAs.

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 that 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.

Should you have any questions regarding this letter, please feel free to contact me at (860) 424-3779 or by email at karen.michaels@ct.gov.

Sincerely,

A handwritten signature in blue ink that reads "Karen A. Michaels".

Karen Michaels, EA III
DEEP Land and Water Resources Division

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cc: Waterford Coastal File – Proposed Zoning Text Amendments: Sections 1, 6.2.11 and new Section 3.45