



ENVIRONMENTAL PROTECTION BOARD

CITY OF STAMFORD, CONNECTICUT  
INTER - OFFICE CORRESPONDENCE

July 31, 1984

Jon A. Smith  
Planning & Zoning Director

Re: Environmental & Coastal Management Review of Proposed  
Re-zoning for Shippan

Dear Mr. Smith:

The following comments on the proposed re-zoning for the Shippan Neighborhood, Application #84-020 have been reviewed and approved by the Environmental Protection Board. These comments are based on a review of natural resource information on the area, site visits, consideration of potential environmental impacts, and consideration of the goals and policies of the Connecticut Coastal Management Act (CCMA). Inclusion of these comments in the Zoning Board's deliberations should ensure compliance with

both the CCMA and the City's contractual agreement with the State Department of Environmental Protection.

The comments regarding applicable coastal policies, important resources, and suggested changes in the map are presented in outline form. We would be happy to make a presentation at the public hearing or further elaborate on any point if desired by you or the Zoning Board.

Sincerely,

Mark W. Lubbers  
Executive Director

MWL:KJB:mb

I. Policies and Guidelines

- A. CCMA policies - All of the natural resources and coastal use policies of the Act apply to the area of proposed re-zoning. Reference to Planning Report #30 is suggested for a listing and description of those policies.
- B. Local policies - Natural resource and coastal use policies have been included in the proposed Master Plan coastal addendum. These policies are general guidelines as well as specific concerns for the Shippan area. Examples are:
  - 1. "Protect the unique landform of the Shippan Point penninsula by establishing setbacks, designating conservation areas, and appropriate building practices."
  - 2. "Prevent further alteration of existing stretches of modified bluffs and escarpments"
  - 3. "Consider removal of illegal structures in erosion prone areas", (e.g., along the Shippan Shorefront).
  - 4. "Minimize encroachment into intertidal areas"
  - 5. "Maintain islands as conservation and natural habitat areas"
- C. Exceptions - No discussion of the industrial water-dependent uses is included here since they will be discussed as part of the "Target Area" master plan addendum.

II. Existing Resources

- A. Coastal resources of greatest importance around the shoreline of the Shippan penninsula include Islands, modified Escarpments, Beaches, Bluffs, Flood Hazards, and Developed Shorefront. The other natural resources listed in the CCMA and found in the area are of lesser importance because of their more limited scope, more limited connection with land-side zoning, or because of existing regulatory controls. Coastal resource maps are attached.
  - 1. Islands - The most important island within this area other than the historic island of Shippan itself is Jack's Island. This 0.7 dry-land-acre island holds a variety of vegetation, rock formations and sand while acting as the base of a large breakwater protecting part of the Yacht Haven East marina.

2. Modified Escarpments - This term is given to the majority of the Shippan shoreline because the approximately 300 seawalls, groins and other shorefront structures erected around the penninsula have partially and temporarily slowed the natural processes of erosion, littoral drift and deposition. (An impact of these structures which compounds the problem and hastens their erection is that by affecting the natural dynamic processes they accentuate the apparent loss of shorefront on others in the area.)
3. Beaches - The beach sand found around Shippan varies in depth because of the structures mentioned above. However, the beaches are important recreational resources and are an important part of the area's visual texture and quality.
4. Bluffs - The 50 ft. high and approximately 2000 ft. long bluff found on the southeast side of Shippan between Fairview and Shippan Avenues is considered the major source of land-based sediment and sand load to the beaches along Shippan and Westcott Cove. This bluff, the beaches and escarpments exist because of the penninsula's geology. The penninsula is composed of glacial drift which means there is little to no bedrock along the shoreline to support development. Other sites of similar composition in this end of Long Island Sound are the Norwalk Islands and Greenwich Point which are sparsely developed and limited to recreation.
5. Flood Hazard Areas - Attached is the latest flood insurance rate map which indicates the medium size storm potential (waves and surge up to 15' above normal water levels). What the map does not show is the true extent of inland coverage. Recent topographic surveys have shown the extent of flooding to cover Saddle Rock Road and to extend further inland along the Sea Beach Drive and Hobson Street area. The next large coastal storm could cause significant damage to high value properties which have not been designed to withstand coastal storms. Even those structures which have survived previous storms may be threatened because of the continuing rise in sea level. Measurements from 1978 have raised mean sea level in this area two-tenths (0.2) of a foot.

6. Developed shorefront areas are not natural resources but are considered an important coastal resource because these areas are appropriate for gaining water access by industrial and commercial uses; i.e., the water-dependent uses which the CCMA policies support and encourage. These areas are designated where bulkheads and rip-rap or similar structures exist, in this case along the East Branch down to Harbor Plaza and within the Cummings Park lagoon.

### III. EPB-Proposed Changes

As a result of this review of coastal resources and policies the following changes are suggested in the proposed zoning.

1. Property at southeastern end of Seaview Avenue; presently zoned MG; proposed zoning R-5.

This site contains the last of the landside boating support facilities for the private marina existing at the site and the adjacent public marinas.

The CCMA and local MCP policies suggest continued support for these facilities. In addition the property is subject to the wave action from coastal storms which requires extensive floodproofing measures for residential structures under the flood prone area regulations. For these reasons, we suggest Commercial Shorefront (C-S) zoning for the subject property. In this way the loss of marina facilities in the Westcott Cove area will not be attributed to zoning yet the potential for the desired residential development will remain.

2. Properties at the north end of Lindstrom Road; presently zoned MG; proposed zoning M-L.

Again this area contains some of the last remaining boating support facilities for this stretch of shoreline. These facilities and the adjacent marinas are in disrepair and will probably only be rebuilt when part of a mixed use plan. In this case either the proposed M-L zone or a suggested C-S zone would accomplish the objective of allowing the boat yard facilities however, we feel the C-S zone would be a clear indication of what is desired; i.e. encouraging boat yard facilities.

3. East side of Ocean Drive East, south of Fairview Avenue and northeast of Shippan Avenue; presently zoned R-20; proposed zone R-20.

This block of property on the sound contains the large bluff previously described. Because this area is subject to severe erosion potential and because the bluff is the main land source of sand for adjacent beaches, allowing the natural erosion to continue is important to maintain the quality of the Shippan and Westcott Cove shoreline and proper setbacks for structures are necessary to ensure their safety. This could be accomplished by larger lot zoning (e.g. RA-1) to reduce the number and proximity of units along the bluff or by overlay or performance standards which might be included in the local coastal area regulations. Either measure is considered satisfactory.

4. Jack's Island; presently zoned R-10; proposed zoning R-10.

This island has enough complexity and area to handle the wear and tear of recreational use and support a variety of wildlife. Consequently use of this island should meet the CCMA policies for islands which suggest preservation of its recreational and conservation values. Ways to ensure meeting this goal are by larger lot zoning, performance or overlay standards, or by creation of a new island zoning category which may be applied to other Stamford islands. Since the creation of a new category is a separate application, we suggest a change of the proposed zone to at least R-20 and preferably RA-1. It is assumed that any development of the island would require filling so that any existing discrepancies between its size and zoning would be negligible.

5. State-mapped tidal wetland at the western end of Mitchell Street; existing zoning M-L, M-G and R 71/2 (?); proposed zoning M-L and R 71/2.

Rather than place the wetland area in both zones, inclusion of the wetland completely within an R-71/2 (or larger lot) zone seems the most appropriate because R-71/2 is a less intensive development zone and because no conservation zone exists in present zoning categories.

6. Southwestern side of Ocean Drive West, Saddle Rock Road area; existing zoning R-20; proposed zoning R-20.

Because of the acute flood hazard along this stretch of shoreline, together with the unstable geology and measureable rise in sea level, long-term planning suggests a reduction in the potential development density of this area.

We suggest consideration of RA-1 zoning for this area of the peninsula.

7. Interior areas of the Shippan (peninsula); present zoning various; proposed zoning various.

Principle environmental concerns in the interior areas are drainage impacts, air and water quality, and sewage volumes. Given that most of these impacts are controllable with present technology, these interior areas are most appropriate for any proposed increase in development intensity.