November 9, 2026

Noank Zoning Commission
Noank Fire District
10 Ward Avenue
Noank, CT 06340

Re: Petition to Amend the Noank Zoning Regulations to Permit Accessory Dwelling Units

Dear Chairman White and Members of the Commission:

I am writing as a Noank property owner to formally request and petition that the Noank Zoning Commission reconsider its position regarding accessory dwelling units (ADUs) and adopt an amendment to the Noank Zoning Regulations permitting their construction and use within the Fire District.

This petition is submitted pursuant to Section 21.2 of the Noank Zoning Regulations and Connecticut General Statutes § 8-3.

Background: The 2022 Decision to Opt Out

In June 2022, the Noank Zoning Commission voted to opt out of the accessory apartment provisions established by Connecticut Public Act 21-29. The Noank Fire District Executive Committee subsequently endorsed that decision at its July 12, 2022 meeting.

Importantly, the Executive Committee's minutes indicate that the rationale for opting out was to preserve greater flexibility in developing regulations appropriate for Noank, much of the public comment at the Commission Public Hearing had encouraged this approach.

The decision was not necessarily a rejection of accessory dwelling units themselves, but rather a determination that Noank should retain authority to establish its own regulatory framework.

The Commission subsequently considered the issue at times over several years. During its September 17, 2024 meeting, members of the public expressed concern that the anticipated development of local ADU regulations had not occurred. Commission counsel also confirmed that individual property owners could initiate a proposed zoning text amendment.

The Commission continued considering the issue through 2025 and it appears ultimately discontinued its efforts. Nevertheless, significant subsequent developments warrant revisiting the question.

Changes in Connecticut Law and Housing Policy

Since Noank's original decision on ADUs, the Connecticut General Assembly has continued to enact legislation intended to expand housing opportunities and reduce unnecessary barriers to residential development.

As you know, the General Assembly enacted **Special Session Public Act 25-1, An Act Concerning Housing Growth,** in November 2025.

That legislation establishes a broader statewide framework for addressing housing needs, reducing regulatory obstacles to residential development, and requiring municipalities to undertake coordinated housing-growth planning.

The General Assembly also enacted **Public Act 26-7**, effective October 1, 2026, which specifically addresses accessory dwelling units.

Among other changes, Public Act 26-7 extends the statutory framework governing as-of-right accessory dwelling units to municipalities exercising zoning authority under special acts. It also expands restrictions on separate utility-connection requirements for ADUs.

Although the legislation does not expressly invalidate every previously authorized municipal opt-out, it reinforces the General Assembly's continuing determination that accessory dwelling units represent an important component of Connecticut's housing policy.

These developments provide an appropriate occasion for the Commission to reconsider its earlier decision and determine whether the existing regulations remain consistent with the broader housing objectives established by the legislature and Noank's compliance with them.

Accessory Dwelling Units Are Particularly Appropriate for Noank

I believe accessory dwelling units offer Noank an opportunity to provide additional housing while preserving the distinctive character of our community. It would also provide homeowners with flexibility in the use of their homes.

Unlike conventional multifamily development, an ADU generally adds a single residential unit to an existing property, often without materially changing the appearance or character of the principal residence.

Properly regulated ADUs could provide several benefits to Noank, including:

- Additional year-round housing without requiring substantial new residential development.
- Opportunities residents to maintain their homes while obtaining supplemental rental income.
- Housing opportunities for younger residents, working professionals, and individuals employed in the surrounding community.
- Greater flexibility for multigenerational families and changing household needs.
- More efficient use of existing structures, utilities, and residential infrastructure.

Noank's historic character is among its greatest assets. I do not believe that allowing accessory dwelling units would compromise that character.

Indeed, regulations emphasizing the conversion of existing structures, appropriate building design, and compliance with applicable safety requirements could accommodate additional housing while preserving the village's architectural integrity. Many, many Noank homes already contain multiple units, many of them outside of the existing requirements for multi-family use.

Proposed Amendment

I respectfully request that the Commission adopt a zoning amendment allowing at least one accessory dwelling unit on residential properties containing an existing single-family dwelling.

The amendment should permit ADUs within existing homes, attached additions, and appropriately designed detached structures, subject to reasonable standards and using Connecticut General Statutes § 8-2o as a starting point.

I further suggest that the Commission consider:

1. Permitting ADUs through an administrative approval process rather than requiring individual use variances.
2. Establishing reasonable limitations on size and design while accommodating smaller residential units.
3. Preserving applicable historic architectural protections.
4. Maintaining compliance with building, fire, health, and environmental regulations.
5. Distinguishing legitimate residential ADUs from short-term vacation rentals.

The Commission should also amend existing provisions that would otherwise prevent ADUs, including Section 2.11, which generally prohibits multiple dwellings on a single lot, and Section 2.6, which establishes a minimum dwelling size of 850 square feet.

Smaller units, including apartments of approximately 500 to 750 square feet, can provide valuable housing opportunities without requiring significant physical expansion of existing homes. I understand that this change is already occurring.

Request for Commission Action

I respectfully request that the Commission accept this petition, place the proposed amendment on its agenda, and schedule the appropriate public hearing to consider allowing accessory dwelling units within the Noank Fire District.

I recognize that the Commission previously devoted considerable time to this subject. However, the passage of additional state housing legislation, changing housing needs, and the practical benefits of accessory dwelling units provide sound reasons to reconsider the issue.

Noank can preserve its historic character while accommodating modest, responsible residential growth.

I believe the two objectives are complementary rather than contradictory.

Thank you for your consideration. I would welcome the opportunity to discuss this proposal with the Commission and participate in developing regulations appropriate to Noank. To that end I have included a draft Ordinance Amendment as a starting point.

Lastly, I acknowledge that I am currently an alternate member of the Commission but submit this request in my capacity as a resident of Noank. In the event I am called to service on the actual Commission I would recuse myself from any consideration of this issue.

Respectfully,

Alan E. Tracy
36 Main Street
Noank, Connecticut