



STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT
INTERGOVERNMENTAL POLICY DIVISION

March 19, 2015

Mr. Zack Hyde
Connecticut Office of Policy and Management
450 Capitol Avenue, Hartford, CT 06106

Re: Notice of Scoping:
Milford Property Acquisition

Dear Mr. Hyde:

In accordance with the attached memo, Office of Policy and Management (OPM) staff responsible for the CEPA review of OPM sponsored Urban Act and transportation-oriented development grant-in-aid projects have reviewed the Notice of Scoping for the Milford Property Acquisition. CEPA requires agencies to consider potential environmental impact of certain actions and CEPA regulations (<http://www.ct.gov/opm/cwp/view.asp?a=2990&q=383208>) define environment as follows:

Environment means the physical, biological, social, and economic surroundings and conditions which exist within an area which may be affected by a proposed action including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance and community or neighborhood characteristics.

In response to our review of the aforementioned scoping notice, we submit the following comment:

- The scoping notice includes a diagram described as being "a map of the alternative project sites previously considered." What were the criteria for a site to be considered and what were the factors that led to the town choosing the properties it has decided to acquire?
- Milford Transit District's web site (<http://www.milfordtransit.com/trainstation.htm>), indicates an annual parking permit costs \$275. Has there been an evaluation of the life-cycle cost for parking spaces? Milford's annual cost seems unusually low relative to the daily rate and to the commercial and municipal rates charged in similar areas. It might not even cover the town's costs to operate and maintain parking spaces. If current rates are inadequate to cover the costs, would the town intend to establish rates capable of recovering the full cost to provide parking?

Given the law of demand, demand for parking will be higher if the price of annual parking permits is held lower. This creates pressure to use land for parking that might otherwise serve more beneficial ecological, economic or social purposes. Milford's 2012 Downtown Plan discusses parking options, but does not appear to have to have considered how demand for parking spaces would change with price. Has there been any such analysis?

Providing parking spaces at less than cost might yield other benefits, such as reducing environmental impacts at other parking locations, serving a disadvantaged population or freeing other land for economic development. Even then, there can be a long-term fiscal impact on the town if parking income does not cover the costs. The impact on other services can be significant and any such subsidy should be carefully targeted.

There is increasing recognition of the impact of parking policies on developed areas. The agency and town should consider all available options so Milford can maximize the positive impacts and minimize the negative as the town invests in its downtown area.

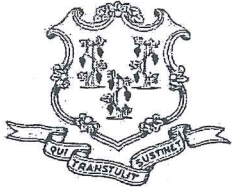
- Various environmental and public health issues might arise during this project because of the building's age and the proximity of the rail line. Has the town done its due diligence to determine what, if any problems might be encountered during the proposed work and assure that the town is prepared to address them? If present at this site, how do such problems compare with those at the alternative project sites?

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:

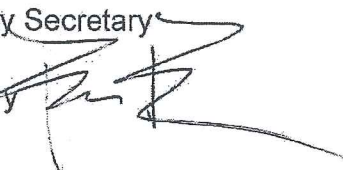


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STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT

TO: Susan Weisselberg, Deputy Secretary

FROM: Benjamin Barnes, Secretary 

DATE: January 12, 2015

RE: Urban Act and Transit-Oriented Development – OPM Sponsored Grant-In-Aid Projects

As you know, the legislation authorizing the Urban Act Grant-In-Aid and Transit-Oriented Development capital development projects (hereinafter "Projects") gives OPM a significant role in implementation. We also have the lead role in review and approval of Connecticut Environmental Policy Act (CEPA) documentation for the Projects. Accordingly, to prevent the potential for a conflict of interest to arise between these roles, I have made the following assignments relative to such Projects.

Consistent with C.G.S. § 22a-1e, I will assist in project implementation, working with Garrett Eucalitto, Gareth Bye, Steven Kitowicz, Dan Morley and Zack Hyde. The mentioned staff shall report directly to me on such Projects and will have no role in the CEPA review process within OPM.

You will oversee the CEPA review process and will be responsible for a recommendation to me on approval of the CEPA document. Staff assigned to the review are Bruce Wittchen and Matthew Pafford.

Staff have been directed to avoid substantive communication across these assigned lines on the Projects. Non-substantive communications, such as those involving simple process questions (e.g., when study scoping meetings will be held), or those that cover publicly available information, or generic legal questions are permitted. If staff members are uncertain about the appropriateness of a given communication, they are to resolve the question with Gareth Bye.

Please let me know if you have any concerns about this approach.

CC: G. Bye
S. Kitowicz
D. Morley
B. Wittchen
M. Pafford
G. Eucalitto

N. Wagner
D. LeVasseur
M. Palmarozza
Z. Hyde