STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy & Planning Division

December 21, 2023

Mithila Chakraborty
Department of Housing
505 Hudson Street, Hartford, CT 06106-7106

Re: Notice of Scoping for Oak Park Redevelopment, Stamford

Dear Mithila,

The Office of Policy and Management (OPM) has reviewed this scoping notice and would like to provide the following comments:

- The scoping notice's Project Description concludes with this statement:

  A Construction Manager was selected and awarded a contract for Construction Management Services for Phase 1 in August 2022. Construction was scheduled to begin in the summer of 2023 and continue for a period of approximately 16-18 months, including demolition of existing buildings.

  Can DOH please elaborate on the construction, demolition, and/or any other work described above and if the work described in this scoping notice is already underway?

- It is unclear if the redevelopment of housing units within the multi-phase Oak Park Redevelopment project will be (a) adding or reducing the total number of housing units and (b) if the new housing units will be comparable in size and accommodations to the current housing units. Further, the scoping notice does not indicate plans for current residents through the redevelopment process.

  Given the housing demands the state is currently experiencing –both for affordable housing and an overall increase in housing units – it would be helpful to understand how this project is balancing the needs of current and future Oak Park residents.

- The mature trees of the ~75-year-old housing complex stand out in satellite and Streetview imagery. The orientation of buildings and other features on the project map suggests that much of the existing urban tree canopy may be preserved if siting and construction are planned and carried out in a manner that prioritizes preserving the mature trees.

  There are several benefits that trees, particularly those 75+ years of age, provide in urban settings that must be considered within the context of this project. These benefits include:

  - Reduction of Urban Heat Island Effect: Urban settings are prone to retaining heat and causing a rise in local temperatures due to a greater density of buildings and impervious surface cover. By providing adequate shade cover for buildings and residents, urban tree canopy reduces this heat island effect. This results in fewer heat-

related illnesses and reduced energy demand, particularly during extreme heat events.

- Stormwater Management: The higher concentration of impervious surface cover in urban areas often results in local flooding and stormwater runoff, which in turn impacts water quality. Trees, particularly mature trees with robust root systems, aid in recapturing stormwater runoff and filtering pollutants from water which is particularly important in urban settings.

- Carbon Storage: Trees aid in the reduction of greenhouse gas emissions by acting as natural carbon sinks. Mature trees store a greater amount of carbon within their complex system than younger trees do. The removal of mature trees releases a fraction of their stored carbon and the subsequent replacement of mature trees with saplings results in less effective carbon sequestration.

- Improved Air Quality: Within urban settings, trees can reduce a significant number of pollutants, especially at the street level, through the absorption and capture of pollutants through their leaves. Mature trees are much more efficient in reducing airborne pollutants than their younger counterparts. Thereby, mature trees are more effective at improving air quality which reduces environmental stressors and the proliferation of respiratory illnesses in urban residents.

Several state and municipal plans highlight the need to preserve and expand urban tree coverage due to this wide range of benefits for human and environmental health. These benefits hold greater significance in communities designated as "environmental justice communities". Environmental justice communities disproportionally face negative health impacts due to poor infrastructure, reduced air quality, and other environmental stressors. The location of the Oak Park Redevelopment project is contained within an existing Environmental Justice Block Group, as shown on CT DEEP's Environmental Justice Communities Map. This designation underscores the need for protection of the mature trees within the footprint of this project.

State-supported housing projects should make every reasonable effort to orient buildings and other development features in a manner to preserve a site's mature urban trees and plant additional trees as appropriate to provide the multitude of benefits outlined above.

Thank you for the opportunity to respond to this Notice of Scoping and we look forward to reading through your responses. Please feel free to contact me if you have any questions.

Sincerely,

Rebecca Dahl
Office of Policy & Management
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To: Mithila Chakraborty, DOH
From: Linda Brunza
Telephone: 860-424-3739
Email: Linda.Brunza@ct.gov

Date: 12/20/2023

Subject: Scoping Notice for Oak Park, Stamford

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project sponsored by the Department of Housing (DOH). The project is located at various addresses on Ursula Place, Dale Street, and Cove Road in Stamford. The project is a multi-phased redevelopment on an existing 168-unit family community with one and two-story buildings. Phase 1 will focus on the construction of a multifamily building, seven townhouse buildings with a total of 61 units, and site work improvements including drainage and landscaping. Phase 2 will develop additional townhouse buildings which will contain 43 units and a playground. Phase 3 will have 13 townhouse style buildings which will contain 62 units.

The following comments are submitted for your consideration. There will be information linked to DEEP's website as well as contact information for the programs.

The Permitting/ Regulatory Programs section contains information on DEEP's regulatory programs that may require permits for the project or may be supplementary information, needed in order to complete a permit application (such as the Natural Diversity Database program and Fisheries Division). The links and contact are there to help guide the applicant and sponsoring agency to determine if permits are required after the project moves closer to design and construction. These comments are meant to provide a high-level analysis of the area, since scoping notices tend to be at the beginning stages of a project.

The Information/ Best Management Practices section contains comments that may need to be addressed in the post-scoping notice or Environmental Impact Evaluation.

Permitting/ Regulatory Programs

Stormwater and Dewatering Wastewaters from Construction Activities General Permit
Contact: Permitting and Enforcement Division, DEEP.stormwaterstaff@ct.gov.

The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. This general permit was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction as well as addressing discharges of other stormwater pollutants from the site long term.

The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable

projects (projects primarily by private developers). This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre.
Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with DEEP provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form and SWPCP to DEEP at least 60 days prior to the initiation of construction. Registrations shall include a certification by the Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. The construction stormwater general permit registrations must be filed electronically through DEEP's ezFile Portal. Additional information can be found on-line at: Construction Stormwater GP.

Natural Diversity Database
Contact: Robin Blum, Wildlife Division, Robin.Blum@ct.gov.

DEEP staff reviewed NDDB mapping and found that the project site may be within an NDDB review area. The applicant must submit a Request for Natural Diversity Database State-listed Species Review through the electronic portal.

The Natural Diversity Database (NDDB) Request for Review process was developed by DEEP to assist state agencies with the requirement that any activity authorized, funded, or performed by the state does not threaten the existence of endangered or threatened species. Applicants for state and local permits and grants may be required to consult with the NDDB as part of the application process. Species and habitat surveys may be required in order to assess risks and to determine appropriate mitigation measures.

Maps are available as a pre-screening tool to help determine if there could be an impact to known locations of state-listed species. Shaded areas ("blobs") on the maps show approximate locations of state-listed and federal-listed species and important natural communities. When viewing the NDDB maps, please consider the entire area affected by a project, including any potential runoff or other disturbance. Locations outside of the mapped areas are not necessarily free of listed species; these locations may not have been surveyed and there may be potential impacts from disturbance in these locations. If a project falls within a shaded area, the applicant must submit a Request for NDDB State-listed Species Review, please review Instructions for Creating a New Account located on the DEEP NDDB website.

Information/ Best Management Practices

Watershed Management
Contact: Marlene Krajewski, Water Planning and Management Division, Marlene.Krajewski@ct.gov.

DEEP recommends robust stormwater and sedimentation controls during demolition and construction. In addition, the use of low impact development techniques and green infrastructure in the development can reduce the impact of polluted stormwater from reaching receiving surface waters. Some techniques that can be used in combination are:

- The use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,

- The use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs, roads, and parking lots),
- The minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface.

Solid Waste Disposal

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete, and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g., contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at Demolition Debris.

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. Pursuant to section 22a-241a of the CGS, the state set a goal of 60% rate of diversion from disposal for municipal solid waste by the year 2024 and adopted that goal in the state's December 2016 *Comprehensive Materials Management Strategy*. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. Additional information concerning construction and demolition material management and waste management plans can be found on-line at Construction and Demolition Material Management and Construction and Demolition Waste Management Plans.

Special Waste

If abatement is required for asbestos containing materials (ACM), these materials are regulated as a "special waste" in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these materials may only be disposed of at facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: Special Waste Fact Sheet.

Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (i.e., paint, roofing, flooring, insulation, etc.). EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. The guidance can be found at: PCBs in Caulk. Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors. roofs, ventilation, etc.) and demolition projects, whenever possible. However, the

continued use of such PCB materials is prohibited and, where it is identified, it must be addressed. EPA recommends testing caulk that is going to be removed as the first step to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP. Further information concerning the DEEP PCB Program can be found on-line at: DEEP PCB Program.

In addition to asbestos and PCBs, demolition debris may also be contaminated with lead-based paint, chemical residues, or other materials that require special disposal. For more information on these materials and disposal, see the DEEP's Renovation and Demolition Web Page.

Deconstruction, an environmentally friendly alternative to demolition, should be utilized to salvage as much of the reusable materials as possible, diverting them from the waste stream. Salvaged items typically include doors, windows, cabinets, lighting and plumbing fixtures, framing lumber, roofing materials, and flooring. Additional information concerning deconstruction can be found on-line at: Deconstruction.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Eric Hammerling