



State of Connecticut

# Environmental Review Checklist

Last Updated 02/25/2020

## Instructions for Use:

The Environmental Review Checklist (ERC), as defined in Sec. 22a-1a-1(9) of the Regulations of Connecticut State Agencies (RCSA), is intended to assist state agencies in (1) determining whether a proposed action or category of actions requires public scoping, or (2) in recording an agency's initial assessment of the direct, indirect, and cumulative environmental effects of a proposed action at the completion of public scoping.

For the purposes of CEPA, an Action is defined in Sec 22a-1a-1(2) of the RCSA as an individual activity or a sequence of planned activities initiated or proposed to be undertaken by an agency or agencies, or funded in whole or in part by the state.

Completion of the ERC is only *required* as part of a sponsoring agency's post-scoping notice in which the agency has determined that it will not be preparing an EIE (Sec. 22a-1a-7(d) of the RCSA).

In all other instances, the sponsoring agency has the option to use this form or portions of it, in conjunction with the applicable Environmental Classification Document (ECD), as a tool to assist it in determining whether or not scoping is required and to document the agency's review. This can be especially useful for an agency administering a proposed action that is not specifically represented in the ECD or which may have additional factors and/or indirect or cumulative impacts requiring further consideration.

Even if an agency ultimately determines that public scoping is not necessary, as a matter of public record OPM highly recommends that the agency internally document its decision, and its justification.

In completing this form, include descriptions that are clear, concise, and understandable to the general public.

Note that prior to reviewing a proposed action under the Connecticut Environmental Policy Act (CEPA), Connecticut General Statutes (CGS), Section 16a-31 requires agencies to review any proposed actions for the acquisition, development or improvement of real properties, or the acquisition of public transportation equipment or facilities, and in excess of \$200,000, for consistency with the policies of the State Plan of Conservation and Development (State C&D Plan).



State of Connecticut

# Environmental Review Checklist

Last Updated 02/25/2020

## PART I – Initial Review and Determination

Date: 06/21/2024  
Name of Project/Action: Oak Park Phase I  
Project Address(es): 168-202 urula place, 51-75 dale street, 346-368 cove road,  
Stamford CT 06902  
Affected Municipalities: Stamford  
Sponsoring Agency(ies): DOH  
Agency Project Number, if applicable: FX24135002  
Project Funding Source(s)/Program(s), if known: FLEX/ \$4,000,000

Identify the Environmental Classification Document (ECD) being used in this review:

Generic, or  Agency-Specific

An environmental assessment or environmental impact statement is being prepared pursuant to NEPA and shall be circulated in accordance with CEPA requirements.

The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment or indicate the status of those reviews: Received “no historic properties will be affected” letter from SHPO.

Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency’s responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).

Completed by: Mithila Chakraborty, Ph.D., Environmental Analyst 1

*Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.*

## **PART II – Detailed Project Information**

### **Description of the Purpose & Need of the Proposed Action:**

Oak Park Phase 1 (OP1) is the first phase of a multi-phased redevelopment of an existing 168 -unit family community consisting of one and 2-story garden style buildings. The OP1 development will focus on the construction of a multifamily building, (7) townhouse style buildings, site work improvements including the installation of drainage infrastructure and landscaping. There will be a total of 61 residential units in OP1. The three-story tall multifamily elevated building will contain (16) one-bedroom units, (4) two-bedroom units, (6) three-bedroom units, offices, and community space. The townhouse buildings will consist of 35-units (28 two-bedroom and 7 three-bedroom).

The development site is located at the junction of Ursula Place and Dale Street on the East Side of Stamford, Connecticut.

### **Description of the Proposed Action:**

Two additional phases are planned for future Oak Park redevelopment. Phase 2 is located to the north of Phase 1 and will consist of (7) townhouse style buildings containing (43) units which will include (34) two-bedroom and (9) three-bedrooms units. A playground for children ages 5 to 12 will be constructed in this phase. Phase 3 is located to the south of Phase 2 and will consist of (13) townhouse style buildings containing (62) units. There will be (48) two-bedroom and (14) three-bedroom units in this phase. In Phase 2 and 3, site work improvements and landscaping, as described for Phase 1, will be included in the scope of work.

### **Alternatives Considered:**

No Action Alternative.

### **Public concerns or controversy associated with the proposed action:**

None.

**PART III – Site Characteristics (Check all that apply)**

- The proposed action is non-site specific, or encompasses multiple sites;
- Current site ownership:  N/A,  State;  Municipal,  Private,  Other: Please Explain.
- Anticipated ownership upon project completion:  N/A,  State;  Municipal,  Private,  Other: Please Explain.

**Locational Guide Map Criteria:**

<http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cff556a>

**Priority Funding Area factors:**

- Designated as a Priority Funding Area, including  Balanced, or  Village PFA;
- Urban Area or Urban Cluster, as designated by the most recent US Census Data;
- Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
- Existing or planned sewer service from an adopted Wastewater Facility Plan;
- Existing or planned water service from an adopted Public Drinking Water Supply Plan;
- Existing local bus service provided 7 days a week.

**Conservation Area factors:**

- Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
- Existing or potential drinking water supply watershed(s);
- Aquifer Protection Area(s);
- Wetland Soils greater than 25 acres;
- Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
- Category 1, 2, or 3 Hurricane Inundation Zone(s);
- 100 year Flood Zone(s);
- Critical Habitat;
- Locally Important Conservation Area(s),
- Protected Land (list type): Enter text.
- Local, State, or National Historic District(s).

**PART IV - Assessment of Environmental Significance – Direct, Indirect, And Cumulative Effects**

<b>Required Factors for Consideration (Section 22a-1a-3 of the RCSA)</b>	<b>Agency’s Assessment and Explanation</b>
Effect on water quality, including surface water and groundwater;	<p>The proposed action will not result in any impact to groundwater and surface water quality.</p> <p>DEEP comments indicated the applicability of Stormwater and Dewatering Wastewaters from Construction Activities depending on the size of the disturbance regardless of phasing. This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre.</p> <p>According to development team: The permit is called “General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities” and is permitted through CT DEEP. This permit requires projects that meet certain disturbance criteria to complete a stormwater registration using the online eFiling System. This project has an expected site disturbance just over 4-acres which is considered small construction (1-5 acres of disturbance) and does not require registration or plan review provided a land-use commission of the municipality (i.e. planning/zoning board) review and issues a written approval of site plans that includes a sediment and erosion control site plan. We fall into this category since the project was reviewed by the City Zoning Board, which included the City Engineering Department to review the site plans and stormwater management design.</p>
Effect on a public water supply system;	The project will not have any impact on the public water supply system. The location of this project is not in an aquifer protection area.
Effect on flooding, in-stream flows, erosion or sedimentation;	The project site is not located in 100- or 500-year flood zone, but in area of minimal flood hazard.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project complies with Section 106.

<p>setting; OR B. Disruption of an archeological or sacred site;</p>	
<p>Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;</p>	<p>The project is not located in any Natural Diversity Database area.</p> <p>DEEP staff reviewed NDDDB mapping and found that the project site may be within an NDDDB review area. The applicant must submit a Request for Natural Diversity Database State-listed Species Review through the electronic portal.</p> <p>Applicant did the NDDDB review and received approval letter from DEEP saying “Based on current data maintained by the Natural Diversity Database (NDDDB) and housed in the DEEP ezFile portal, no extant populations of Federal or State Endangered, Threatened or Special Concern species (RCSA Sec. 26-306) are known to occur within the project area delineated for the Building and Infrastructure Development (including stormwater discharge associate with construction) / New Residential - subdivision, Oak Park Phase 1.”</p>
<p>Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;</p>	<p>Based on the type and the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated.</p>
<p>Substantial aesthetic or visual effects;</p>	<p>The project is not expected to cause substantial aesthetic or visual impacts in the area.</p>
<p>Inconsistency with: (A) the policies of the State C&amp;D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;</p>	<p>Proposed project is consistent with the State C&amp;D Plan Growth Management principles #1 (Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure); Growth Management Principle #2 (Expand Housing Opportunities and Design Choices to Accommodate a variety of Household Types and Needs); and Growth Management Principle #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options).</p>
<p>Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;</p>	<p>Temporary disruption is expected during construction, but the long-term affect will be positive to the site and neighborhood.</p>

Displacement or addition of substantial numbers of people;	No direct, indirect, or cumulative impacts.
Substantial increase in congestion (traffic, recreational, other);	The project is unlikely to result in significantly more traffic than currently exists or historically existed in the project area. During work there can be some temporary traffic but best management practice can be adopted to reduce the impact.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	Some increase may occur.
The creation of a hazard to human health or safety;	No direct, indirect, or cumulative impacts.
Effect on air quality;	The proposed project is not a commercial or industrial facility.  DOH advised the client to adopt best management practices to reduce potential air quality impacts.
Effect on ambient noise levels;	No direct, indirect, or cumulative impacts.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No adverse impact on coastal or inland wetland are anticipated.
Effect on agricultural resources;	No adverse impact on agricultural land is anticipated.
Adequacy of existing or proposed utilities and infrastructure;	Existing utilities are present on site and in the area.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Not any adverse impact is anticipated.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Not any adverse impact is anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Not any adverse impact is anticipated.
Cumulative effects.	Based on the scope of the project, the proposed project is not anticipated to result in any cumulative impact on the environment.

**PART V - List of Required Permits, Approvals and/or Certifications Identified at the Time of this Review**

OPM has made recommendations in their review letter dated December 21, 2023 (attached). On request of DOH, Developer/Consultants confirmed that all comments were considered.

**Construction Status:** No demolition, site infrastructure installation, or construction of new buildings has taken place. The anticipated commencing of demolition was in late winter. Construction will follow in May or June of this year.

**Redevelopment Plan vs. Existing:** The Oak redevelopment involves the demolition of 166 existing units and the new construction of the same number of new units. The new unit mix will include the same number of one BR units, but a larger number of three BR units and somewhat fewer two BR units. The change reflects demand across the existing waitlists and the general population development serve. The new units will be approximately 1/3 larger than the existing units. The existing development consists of townhouse style units. The new development will include a 26-unit multifamily building to accommodate the accessible units, management office, security station, community room, an elevator, etc. There is currently no office or community space on site, and mobility for tenants in accessible units will be greatly improved.

**Temporary Resident Relocation:** The Oak Park redevelopment is planned to be completed in three phases. The first phase, Oak Park 1, is the subject of these comments. In anticipation of redevelopment, naturally occurring vacancies have not been re-leased for a few years. Most residents of the Phase 1 area have been temporarily relocated onto vacant units in the Phase 2 and 3 areas of the site. All vacant units were fully refreshed using our normal unit turnover process prior to occupancy. Tenants that were over-housed or under-housed were offered right-sized units in other developments owned by Charter Oak Communities. A lottery was held for Tenant-Based Section 8 vouchers for the number of Phase 1 units for which on-site or right-size units were not available. Most residents preferred to remain on-site so all tenants that requested vouchers received them. All temporary relocation has been completed. All relocated residents have priority to return to the completed Phase 1 if they wish to do so. This includes those that received vouchers. Oak Park 1 will replace 60 existing units with 61 new units. For a variety of reasons, including to limit the amount of tree removal, to add 40 additional off-street parking spaces, and to comply with the requirement not to increase runoff from the site, it was not possible to increase density on the Oak Park site.

**Tree Removal:** More time and effort was devoted to preserving as many trees as possible than to almost any other site plan consideration. The development team retained a professional arborist through the landscape architect and evaluated the condition and health of every tree, the likelihood of each tree's survival through the development process, and whether any conflict between buildings and trees could be avoided. To the maximum extent possible, the development team have located new buildings where the old buildings were. That will help preserve existing trees. The development team has committed to an aggressive planting plan to replace trees which cannot be retained due to poor condition or conflict with development plans. The development team is very confident that the plan retains the maximum number of trees and that our planting plan for new trees exceeds the norm. That was certainly the reaction of the Stamford Planning and Zoning Boards and Land Use Bureau staff during their review and approval of our zoning application. Tree retention and planting is a primary focus during zoning reviews, and the development team received high marks for the Oak Park 1 site plan.

**DEEP also has made recommendations in their review letter dated December 20, 2023 (attached). On request of DOH, Developer/Consultants confirmed that all comments were considered.**



**Stormwater and Dewatering Wastewaters from Construction Activities General Permit:** According to development team: The permit is called “General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities” and is permitted through CT DEEP. This permit requires projects that meet certain disturbance criteria to complete a stormwater registration using the online eFiling System. This project has an expected site disturbance just over 4-acres which is considered small construction (1-5 acres of disturbance) and does not require registration or plan review provided a land-use commission of the municipality (i.e. planning/zoning board) review and issues a written approval of site plans that includes a sediment and erosion control site plan. We fall into this category since the project was reviewed by the City Zoning Board, which included the City Engineering Department to review the site plans and stormwater management design.

**Natural Diversity Database:** DEEP staff reviewed NDDDB mapping and found that the project site may be within an NDDDB review area. The applicant must submit a Request for Natural Diversity Database State-listed Species Review through the electronic portal. Applicant did the NDDDB review and received approval letter from DEEP saying “Based on current data maintained by the Natural Diversity Database (NDDDB) and housed in the DEEP ezFile portal, no extant populations of Federal or State Endangered, Threatened or Special Concern species (RCSA Sec. 26-306) are known to occur within the project area delineated for the Building and Infrastructure Development (including stormwater discharge associate with construction) / New Residential - subdivision, Oak Park Phase 1.”

**Watershed Management:** DOH requests the development team to follow recommendations from DEEP.

**Solid Waste Disposal:** All building demolition debris from the Oak Park Phase 1 project will be accepted by a facility approved to accept demolition debris. All demolition will comply with all provisions of The Connecticut State Code (29-401 to 29-415).

**Special Waste:** Any contaminated materials will be handled per The State of Connecticut regulations.

Regarding regulated wastes that will be generated when the buildings at Oak Park are demolished: this includes the painted wood clapboards on some of the buildings that have TCLP lead levels exceeding 5.0 mg/l and the clapboards and plaster with paint that contains 1-50 ppm of PCB's: "The contents of waste containers with building materials having an aggregate TCLP lead content of 5.0 mg/l or greater will be disposed of as hazardous waste in accordance with RCRA requirements. Plaster and wood clapboards with paint containing 1-50 ppm of PCB's will be disposed of at a facility approved to accept such waste in accordance with applicable State and federal regulations."

## PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DOH recommends that the project proceed as proposed and preparation of an Environmental Impact Evaluation (EIE) is not warranted.

## PART VII - Public Comments and Sponsoring Agency Responses:

No public comments provided during scoping notice period.