

**STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL ASSESSMENT CHECKLIST**

Date: September 3, 2019

Project Name: Stamford Parking Garage Project, Project No. 301-0047

Municipality: Stamford

Staff Contact: Kevin Fleming

Date of Scoping: October 2, 2018

This assessment was conducted in conformance with the Connecticut Department of Transportation's Environmental Classification Document (ECD) to determine Connecticut Environmental Policy Act (CEPA) obligations.

Project Description:

The Connecticut Department of Transportation (CTDOT) is proposing to construct a new, open-air parking garage for the Stamford Transportation Center (STC) on South State Street in the City of Stamford. The new garage will be connected to the station via an enclosed pedestrian bridge from Level 4 over Washington Boulevard, and connected directly to rail service on Track 5 via a pedestrian ramp from Level 2 to the station platform.

The proposed project site is State of Connecticut property bounded on the south by Metro-North Railroad right-of-way, on the east by Washington Boulevard, on the west by the Rippowam River, and on the north by I-95. The project site is approximately 2.6 acres and is partially occupied by an existing surface parking lot for the STC.

The purpose of the proposed project is to replace the aging Original Garage structure (currently located on Station Place) with a low maintenance, long service life facility that meets the demand for State-owned commuter parking spaces located proximate to the STC. The needs for the project include:

- Addressing the poor condition and continued degradation of the Original Garage structure that have precipitated closing of two levels of the garage to traffic and parking;
- Satisfying existing commuter parking demands at the STC;
- Replacing the potential loss of *private* commuter parking supply for the STC with State-owned and maintained parking spaces that provide similar convenience and commuter amenity as the existing private parking facilities;
- Meeting customer expectations for availability, accessibility, and convenience of commuter parking accommodations of the STC; and
- Minimizing and managing commuter disruption and commuter parking impacts during the construction of the proposed parking garage.

The proposed garage will provide approximately 960 commuter parking spaces on seven parking levels, resulting in a net increase of approximately 130 State-owned spaces at the STC.

The ground level will be utilized for access to the proposed garage, covered bicycle parking, and management office spaces and appurtenant functions. South State Street will be realigned and reconstructed but will be maintained through the ground level of the garage as a one-way (eastbound) state roadway (SR 790). A left-in/left-out vehicular access will be provided from eastbound South State Street to the proposed garage and a right-in vehicular access will be provided from southbound Washington Boulevard.

Bicycle and pedestrian traffic will be accommodated through the site on a new multi-use path located along the north side of South State Street; a sidewalk will also be located on the south side of the street. The multi-use path will link the planned Mill River Greenway at the Rippowam River to existing bicycle facilities and sidewalks on Washington Boulevard.

The proposed parking garage and pedestrian bridge will likely be advanced to design and construction as a State-funded design-build project, with construction planned to begin in 2020. Parking will be maintained in the Original Garage structure throughout construction of the proposed garage to help minimize commuter parking impacts. The Original Garage will be closed upon completion of the proposed garage and will be demolished in the future under a separate State project and construction contract.

CTDOT previously pursued a new parking project for the STC as part of a transit-oriented development (TOD). Under this previous effort, CTDOT completed an Environmental Impact Evaluation (EIE) in accordance with CEPA to evaluate and document the potential environmental impacts of the project and to outline recommended mitigation for those impacts. Because the limits and location of the current project are within the limits of the previous project, many of the findings of the EIE (dated August 2012) relative to environmental resources, potential impacts, and mitigation are still valid and are referenced throughout this document. A link to that document can be found in the August 21, 2012 edition of the *Environmental Monitor*.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of Environmental Significance (Direct/Indirect)

1. Impact on air and water quality or on ambient noise levels

a) Air Quality – No negative impacts are anticipated. An air quality assessment was performed as part of the 2012 EIE and the analysis determined that the project is in conformity with the Clean Air Act, as amended, pursuant to all Environmental Protection Agency regulations. A microscale air quality modeling analysis for CO was also performed as part of the 2012 EIE and concluded that any short or long-term adverse impacts were not anticipated for that project. Because that evaluation considered significantly higher traffic volume increases in the study area than the current project, it is similarly concluded that this project will not have any short or long-term adverse impacts on microscale air quality.

In addition, to help achieve Connecticut's transition to transportation electrification, the garage will include the allocation of electrical vehicle (EV) parking. It is anticipated the initial allocation may be up to 25 EV spaces, with the potential to expand. This infrastructure will have a positive impact on reducing greenhouse gas emissions and improving air quality.

There is potential for construction-related air quality impacts; however, these potential impacts can be limited or avoided by proper operation of construction equipment; and adhering to regulations limiting the idling of on-site construction vehicles. Potential impacts from fugitive dust emissions created during on-site construction activities can also be mitigated by the regular application of water or calcium chloride for dust control on exposed soils.

b) Water Quality – No negative impacts are anticipated. The project is in an existing urbanized area and most of the project site is comprised of bituminous paved parking and street surfaces. Existing stormwater from the site is captured in the closed drainage system and conveyed to the Rippowam River through two Reinforced Concrete Pipes (RCP) that outlet directly to the riverbank. The latest 2016 *Connecticut Integrated Water Quality Report* includes the Rippowam River on the impaired waters list for its designated use as habitat for fish, other aquatic life and wildlife; cause for the impairment is shown as “unknown,” though potential sources are cited as including stormwater, industrial discharges, and remediation sites, among others.

The project must conform to CTDEEP’s *General Permit for the Discharge of Stormwater from Department of Transportation Separate Storm Sewer Systems* (DOT MS4 Permit). Primary stormwater treatment measures will be investigated for this project. It is anticipated that secondary stormwater treatment practices will be implemented for the project in order to treat water quality due to the urbanized setting and since there is limited available right-of-way space for constructing a primary stormwater treatment facility. The stormwater drainage system for this project will be designed in conformance with the 2004 CTDEEP Stormwater Quality Manual.

The project is eligible for CTDEEP’s *General Permit for Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities*. As part of this permit, CTDOT will develop a stormwater pollution control plan for the project in order to avoid or minimize impacts from construction stormwater runoff to water quality. Best Management Practices designed in accordance with *2002 Connecticut Guidelines for Erosion and Sedimentation Control* will be included in the plan.

In addition, all CTDOT projects must conform to the CTDOT Standard Specifications for Roads, Bridges, Facilities and Incidental Construction Form 817. Section 1.10.03, Environmental Compliance specifically deals with water pollution control and Best Management Practices.

c) Ambient Noise Levels – No impacts are anticipated. As cited in the 2012 EIE, application of the Federal Transit Administration’s methodology outlined in the *Transit Noise and Vibration Impact Assessment* guidance document concluded that there are no potentially sensitive receptors within the project area. CTDOT staff reviewed this item and have determined that the findings are still valid.

Any noise impacts during construction will be temporary and minimized to the best extent possible. Construction specifications require the contractor to comply with Best Management Practices as per Form 817, Section 1.20-1.10, Environmental Compliance for Facilities Construction:

“1.20-1.10.05—Facilities Construction - Construction Noise Pollution: The Contractor shall take measures to minimize the noise caused by its construction operations, including but not limited to noise generated by equipment used for drilling, pile-driving, blasting, excavation or hauling. All methods and devices employed to minimize noise shall be subject to the continuing approval of the Engineer. The maximum allowable level of noise at the residence or occupied building nearest to the Site shall be 90 decibels on the “A”-

weighted scale (dBA). The Contractor shall halt any Project operation that violates this standard at any time until the Contractor develops and implements a methodology that enables it to keep the noise from its Project operations below the 90-dBA limit.”

2. Impact on a public water supply system or serious effects on groundwater, flooding, erosion, or sedimentation

a) Water Supply – No negative impacts are anticipated. The Department of Public Health (Drinking Water Section) indicated in their comments dated November 8, 2018 that the project area is not within a public drinking water supply source water area. The project is within the service area of the Aquarion Water Company and water to the proposed garage will likely be drawn from the existing water main serving Washington Boulevard. Water usage will be limited to employee lavatory use and periodic garage washdowns.

b) Groundwater – No negative impacts are anticipated. All CTDOT projects conform to the CTDOT Standard Specifications for Roads, Bridges, Facilities and Incidental Construction Form 817. Section 1.10.03, Environmental Compliance, specifically deals with water pollution control and Best Management Practices. Additionally, the project is not located within or near an Aquifer Protection Area.

c) Flooding – No negative impacts are anticipated. The mapped boundary of the 100-year floodplain of the Rippowam River runs along the western edge of the project site; although there is likely to be some site work within the mapped boundary, this work is anticipated to be above the 100-year flood elevation and would be limited to minor impacts. Additionally, the existing stormwater outfalls are located within the floodplain, but it is not anticipated that the outfalls will be modified for this project. A Flood Management Certification or General Certification may be required to address work within the mapped boundary. A final determination of impacts and any required permitting will be determined as design progresses. Coordination with CTDEEP will occur, as necessary, as the project moves forward. The project will be certified by CTDOT as being in compliance with flood and stormwater management standards specified in the Connecticut General Statutes and in the Regulations of Connecticut State Agencies. It will be demonstrated that there will be no activity within the floodway that will result in any increase in water surface elevation for the 10 or 100-year event as determined by hydraulic modeling. Coordination will take place with CTDEEP as appropriate.

d) Erosion or Sedimentation – No negative impacts are anticipated. Erosion and sediment controls will conform to and be maintained in accordance with the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control*.

3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows – No negative impacts are anticipated. The project is in an existing urbanized area with no coastal or inland wetlands within the limits of the project. As cited in Section 3.11 of the 2012 EIE, available wetland mapping from CTDEEP and National Wetlands Inventory sources indicate wetland resources are restricted to the banks of the Rippowam River located adjacent to the

project. No impacts are anticipated, however, as the project progresses into design it will be determined if any permits are required.

4. Disruption or alteration of an historic, archaeological, cultural, or recreational building, object, district, site or its surroundings – No negative impacts are anticipated. As cited in Section 3.15 of the 2012 EIE, there are no known archaeological resources in the project area. Additionally, the project is in an area that has been continuously developed over the last 400 years and has been highly disturbed; therefore, the potential for intact pre-contact or historic period archaeological resources is very low. The project is not located in a historic district and there are no historic buildings or recreational facilities located adjacent to the project that could be impacted. The Connecticut State Historic Preservation Office (CTSHPO) will be solicited during design to make a final determination of any effect on cultural, historic, or archaeological resources.

5. Effect on natural communities and upon critical species of animal or plant and their habitats; interference with the movement of any resident or migratory fish or wildlife species – No negative impacts are anticipated. As cited in CTDEEP's letter dated November 7, 2018, there are no records of threatened or endangered species listed for the project area.

6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – No negative impacts are anticipated. Operation of the garage itself will not involve the use of pesticides, toxic or hazardous materials in quantities that would create an environmental impact. Any construction related activities that may temporarily disturb soils polluted with hazardous materials will be performed in such a way to minimize any detrimental impacts. CTDOT completed a Task 120 (Preliminary Site Evaluation) and Task 210 (Subsurface Site Investigation) for the project site in 2012. These investigations found that on-site soils contain concentrations of various total and leachable metals, semi-volatile organic compounds, total petroleum hydrocarbons, polychlorinated biphenyls, naphthalene, and chlordane – pollutants that are typical of historical railroad station activities and widespread urban fill. The site is almost entirely covered in paved surfaces, which significantly limits soil exposure. However, construction activities could temporarily expose site workers and surface water runoff to polluted soils, and soil particles could become airborne if not properly controlled. Proper construction site management such as the use of personal protective equipment, erosion and sedimentation controls, and dust control measures will be specified to minimize the projects construction related impacts.

Task 310 plans, specifications and estimates will be prepared to address the disturbance of the identified on-site contamination associated with excavation and foundation construction activities. The Task 310 effort will identify areas of environmental concern, define field-screening procedures, and specify requirements for handling and disposing of contaminated materials. Upon the completion of construction, the new garage and related pavement will restrict direct access to much of the site's underlying soil, and uncontaminated backfill will be used for all greenspace (unpaved) areas. The need to obtain a registration under CTDEEP's *General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer)* will be determined during preliminary design activities; as required, soil management will be conducted in accordance with the General Permit.

7. Substantial aesthetic or visual effects – No negative impacts are anticipated. The proposed parking garage is eight stories, which is less than buildings currently under construction adjacent to the project site and less than buildings in the adjacent district. As such, the proposed structure is not anticipated to adversely affect the available viewshed in the immediate area. Additionally, the proposed garage is being designed with an architectural façade in collaboration with City stakeholders to help ensure the resulting building aesthetic is compatible with visual character and aesthetic goals for the area.

8. Consistency with the written and/or mapped policies of the Statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency – This project is consistent with the Statewide Plan of Conservation and Development. CTDOT has adopted a programmatic approach for meeting the requirements of CGS Chapter 297 Section 16a-31(a) and Chapter 297a Section 16a-35(c) and 16a-35(d) for determining consistency of proposed actions with the Statewide Plan of Conservation and Development. This type of projects characterized as “New Facilities, Expansions”. It is CTDOT’s interpretation is consistent with the Plan of Conservation and Development through Growth Management Principle (GMP) #1 (Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure); specifically, the State policy “Ensure the safety and integrity of existing infrastructure over its useful life through the timely budgeting for maintenance, repairs, and necessary upgrades”. The project is also consistent with GMP #3 (Concentrate Development Around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options), specifically the State policy “Improve transit service and linkages to attract more customers through better integration of all transportation options and advances in technology, while providing convenience, reliability, safety and competitive modal choices.”

It is CTDOT’s interpretation that this project falls under the intended definition of a Growth Related Project. Since this project is located within a Priority Funding Area, nothing further is required to comply with the State Plan of Conservation and Development.

9. Disruption or division of an established community or inconsistency with adopted municipal and regional plans – No negative impacts are anticipated. The location of the proposed garage will not physically divide any existing communities or neighborhoods.

The *South Western Region Long Range Transportation Plan 2015-2040* includes a recommendation for replacing the Original Garage at the STC. The *Stamford Master Plan 2015-2025* references the recommendations of the *Stamford Transportation Center Master Plan (2010)* which include replacing the Original Garage with a modest increase in parking supply. The *STC Master Plan* also suggests new parking should not be concentrated in one location, which is consistent with locating the proposed garage on South State Street, removed from Station Place where there are already 1200 commuter spaces provided in the 2004 Garage.

10. Displacement or addition of substantial numbers of people – No negative impact. This project does not involve the displacement of people. Additionally, this project helps satisfy demand for commuter parking at the STC that already exists in the project area and is not anticipated to induce a substantial number of new parkers to the area.

11. Substantial increase in congestion (traffic, recreational, other) – No negative impacts are anticipated. The *Traffic Impact Study (TIS)* for the proposed garage concluded that the garage would generate approximately 97 new peak hour trips in the project area; the balance of the peak hour trips are currently associated with parking at other locations in the study area and would be redistributed on the street network to the proposed garage. The net result is anticipated to be increased traffic delay and reduced level-of-service at the intersection of South State Street and Washington Boulevard. The TIS proposes traffic signal optimization to mitigate the impacts; additionally, provisions for concurrent pedestrian phasing in conjunction with pedestrian safety improvements at the intersection would further mitigate potential operational impacts.

Temporary traffic impacts are expected during construction due to the required closure of South State Street. Traffic management plans will be developed to provide a temporary detour around the site.

12. A substantial increase in the type or rate of energy use as a direct or indirect result of this action – No negative impacts are anticipated. The proposed garage will require new electrical service to power lights, mechanical equipment, security equipment, revenue control systems, elevators, and electric vehicle (EV) charging stations. Lights will be energy-efficient LED fixtures; mechanical equipment will also be energy efficient. The new power requirements for the proposed facility will be partially offset when the Original Garage is closed and demolished and there is a reduction in power consumption for the existing facilities. The net increase is not anticipated to be substantial.

13. The creation of a hazard to human health or safety – No negative impacts are anticipated. The project will be reviewed for the potential of having lead, asbestos, or other hazardous material constituents in existing infrastructure components. Testing will be performed on any suspect materials. Should the presence of hazardous materials be confirmed through the testing, specifications to properly handle and dispose the hazardous materials will be incorporated into the design to mitigate potential impacts to human health or safety. As a consequence, significant impacts associated with hazardous materials or waste sites are not anticipated.

The proposed garage and appurtenant pedestrian bridge will be designed and constructed in accordance with the latest code requirements and standards. In addition, OSHA guidelines and CTDOT Best Management Practices will be followed throughout construction to provide safety measures for both construction workers and the public.

14. Any other substantial impact on natural, cultural, recreational or scenic resources – No negative impacts are anticipated.

Conclusion:

After examining any potential environmental impacts and reviewing all comments received from the public and commenting regulatory agencies, CTDOT has concluded that the preparation of an Environmental Impact Evaluation (EIE) will not be required for the Stamford Parking Garage project in Stamford, Connecticut. See comments and responses below.

Summary of Public Outreach and Comments from the Public Scoping Period

The Scoping Notice for the Stamford Parking Garage, State Project No. 301-0047, was published in the Council on Environmental Quality's *Environmental Monitor* on October 2, 2018. CTDOT conducted a public scoping meeting on October 24, 2018 in conjunction with a public information meeting for the project. Approximately 25 people attended. CTDOT also presented the project during a regular meeting of the Connecticut Commuter Rail Council on October 17, 2018 and conducted a public open house on October 30, 2018 as part of the overall public outreach efforts for the project. Approximately 12 people attended the open house.

Two agencies and ten individuals submitted written comments during the public scoping period between October 2 and November 7, 2018. The overriding themes of the public comments are presented below and are summarized in *italics*. Responses are provided in [blue text](#). Comments submitted by the Connecticut Department of Energy and Environmental Protection and the Connecticut Department of Public Health are included after the public comment section below.

PROJECT COSTS

Several individuals expressed concern about the estimated construction cost (\$100 million) of the proposed 960-space garage, and some suggested that available funds may be better spent elsewhere.

The reported \$100 million cost of the garage is the total amount of the State bond authorization for the project. This value covers the proposed garage, pedestrian bridge, and South State Street improvements. This value was based on a budget-level estimate and includes estimates for contract items, as well as estimates for design contingencies, construction contingencies, and incidental construction (inspection) costs. The actual cost of the project will be determined by contractor bids.

Because the \$100 million was authorized specifically for the Stamford garage project, these funds cannot be directly reallocated to other projects. Additional transportation investments continue to be considered and prioritized by CTDOT and the State.

ORIGINAL GARAGE SITE

Several individuals questioned the reasoning behind not re-using the Original Garage site for parking improvements. Specifically noting that:

- *The State's interest in moving the parking appears to be financial*
- *The State needs to abandon "its blind ambition to profit from the land sale of public land" and use the Original Garage site*
- *Locating the garage for commuter convenience appears to be secondary to other interests*
- *The design-build nature of project affects transparency and public examination of the project*
- *The State's responsibility is to provide ease of access*
- *It is not clear why the proposed site is a "better" location than the Original Garage site*
- *Use of the Original Garage site should be for parking, not more commercial space*

- *There is no reason the Original Garage site should not be used*

One of the goals for the project is to optimize the use of State-owned land adjacent to the STC. Towards this end, CTDOT is making the highest and best use of the State-owned property on South State Street by expanding commuter parking where there is existing parking, and where other use of this property is highly constrained. Using the South State Street site will also help disperse traffic and parking activity from Station Place.

Additionally, CTDOT needs to maintain as much State-owned commuter parking as possible during construction of the new garage to minimize commuter parking impacts. By using the South State Street site and keeping the Original Garage open, there will be fewer commuter parking spaces impacted by construction activities and fewer displaced parkers.

CTDOT studied the potential travel time impact of providing 960 commuter parking spaces on the South State Street site. The study concluded that the average trip time from the street network to the station platforms is anticipated to be less than 30 seconds longer for customers using the South State Street garage when compared to the average trip time for customers using the Original Garage. The complete analysis and findings are outlined in the Travel Time Study document.

COMMUTER PARKING SUPPLY AND DEMAND

Several comments related to the existing and future commuter parking supply and demand at the STC. Specifically:

- *Parking supply provided by the Original Garage will not be needed during construction; customers displaced from the Original Garage will find space in other public and private parking facilities including Gateway, some will find other travel modes*
- *The proposed garage does not adequately plan for existing and future parking demand; the supposition that most new commuters will ride shuttles and bikes to the station is unsupported*
- *A credible plan to estimate parking demand should be undertaken*
- *The parking supply at other private garages in the area is understated*
- *The need for 960 spaces on South State Street is questionable*

CTDOT completed an existing parking assessment as part of the Traffic Impact Study. The data collected for the parking assessment showed approximately 2,952 total parkers using each of the six parking facilities nearest the STC that are available to commuters (including three public facilities – the Surface Lot on South State Street, Original Garage, and 2004 Garage; and three private facilities – the Gateway Garage, Metro Center Garage, and Metro Green Garage). Relative to the potential parking supply that will be available to commuters nearest the STC upon completion of the proposed 960-space garage on South State Street (assumed to be 2022), the observed parking demand of 2,952 parkers is slightly less than the anticipated supply of approximately 3,077 parking spaces (see Table 1). This supply value assumes there will be no parking allocated to commuters in the Gateway Garage upon its redevelopment for corporate office space.

Generally, the overall conclusion of the parking assessment is that it appears there will be adequate supply in 2022 to accommodate the *existing* parking demand at the facilities nearest the STC; however, it is noted:

- The assessment does not account for the potential effects that variable pricing policies across the public and private facilities will have on the future parking demand and parking distribution across these facilities.
- The apparent overall occupancy rate of 96% in these facilities is higher than the 85-90% occupancy rate that is desired to maintain reasonable parking operations.
- The data suggests there will be little or no accommodation for increased commuter parking demand within these facilities assuming 100% of the current Gateway Garage supply is not available to commuters in 2022.
- The assessment does not quantify the potential effect of mode shift on the future parking demand.

GARAGE/LOT	TOTAL SPACES (IN 2022)
Surface Lot - South State Street	0
Original Garage	0
2004 Garage	1200
Proposed Garage - South State Street	960
Gateway Garage	0
Metro Center Garage	615
Metro Green Garage	302
TOTAL	3077
EXISTING PARKING DEMAND	2952

Table 1. Summary of Parking Demand and Supply Assessment

PROPOSED SITE IS A CONCERN

Numerous individuals expressed concern about the location of the proposed garage on South State Street. Specifically noting:

- *Access to station and all tracks is superior from the Original Garage, especially for handicap persons who need access to elevators*
- *ADA accessibility from the proposed garage is a concern, due to distance*
- *Increased commuting times to/from the proposed garage are a concern*
- *Additional travel distance from the proposed garage is tenuous, equivalent to adding 1.75 avenue blocks in Manhattan*
- *The site is ridiculously far from the platforms, necessitating a much longer travel time due to the length of the proposed bridge over Washington Boulevard*
- *It is not clear how the project accounts for high speed rail expansion in the future*
- *The proposed location would block the site for future station expansion and NEC rail expansion*
- *Some parking should be provided further east since data shows that 60% of traffic comes from points north and east*

CTDOT studied the potential travel time impact of providing 960 commuter parking spaces on the South State Street site. The study concluded that the average trip time from the street network to the station

platforms is anticipated to be less than 30 seconds longer for customers using the South State Street garage when compared to the average trip time for customers using the Original Garage. The complete analysis and findings are outlined in the Travel Time Study document. Specific to travel to the platforms from ADA parking spaces, the average travel distance (for all four service tracks) is approximately 220 feet for the Original Garage and 425 feet for proposed garage. This translates to a longer average travel time of approximately 60 seconds or less. The proposed ADA spaces will be conveniently concentrated on Level 2 adjacent to the ramp to Track 5, and on Level 4 adjacent to the pedestrian bridge to the station.

Relative to concerns about the Federal Railroad Administration's NEC Future plans, the limits of the expanded rail capacity proposed in the *Record of Decision* (dated July 2017) for the Selected Alternative are not sufficiently detailed to assess specifically how the proposed garage structure relates to the expanded rail plan. In general terms, the nearest corner of the proposed garage is more than 25 feet from the centerline of the nearest mainline track, which could provide adequate space for construction of a sixth track in the area of the station.

The proposed garage site does not preclude the future construction of other private or public parking facilities near the STC, as parking demand dictates, including in a location further east of the 2004 Garage. In fact, better distribution of parking around the STC (and not concentrated in one location on Station Place) is consistent with a stated goal of the latest *Stamford Transportation Center Master Plan (2010)*.

PROPOSED FUNCTIONAL PLAN

Some individuals expressed concern about the potential layout and operation of the proposed garage. Specifically:

- *All ramps and aisles must be wide enough for opposing traffic to pass safely*
- *Ramps and aisles must not lead to dead-ends with no place to turn around*
- *Proposed garage must accept multiple forms of payment; a cash-only system is not acceptable*

The proposed garage will provide perpendicular parking with two-way drive aisles that are designed to standard dimensions and that will provide adequate space for normal vehicular parking operations in the garage. The garage will also utilize an intuitive helix layout that leads parkers up into the structure with consistent clockwise circulation between levels; circulation on the roof level provides a simple change in direction that naturally redirects parkers back down through the structure in a counterclockwise direction.

Regarding revenue collection, the garage is being planned to provide efficient processing of vehicles upon entry and exit. As such, there will not be a cash-in-lane payment option. The other specifics of the revenue collection system have not yet been defined; however, it is envisioned that a combination of pre-paid tickets (by way of pay-on-foot kiosks that accept cash/credit) for transients, key cards, an *EZPass*-type system, and/or license plate recognition (LPR) technology could be utilized to expedite pay-in-lane transactions in the proposed garage.

AESTHETIC CONCERNS:

Several individuals expressed concern about the proposed architectural façade for the garage, the nature of the adjacent site improvements, the aesthetic of the STC, and other elements illustrated in the project renderings. Specifically:

- *The proposed garage appears imposing and unwelcoming*
- *The hard, cold appearance of the proposed garage needs to be softened*
- *Consider screens for the garage*
- *Consider additional site plantings and vegetative screening*
- *The sculpture presented in front of the garage is not needed; replace with trees and flowers*
- *The LED/neon lights on the existing STC are not desirable and should not be replicated on the proposed garage*

In addition to the public commentary, CTDOT met with City of Stamford staff in December 2018 and received input on the City's aesthetic goals for the project. These goals include providing a signature structure with iconic and sculptural qualities that will utilize architectural lighting to help create a sense of arrival for travelers to Stamford. CTDOT is redesigning the architectural façade to address public and City commentary and will be presenting the design at a public open house to be scheduled in Spring 2019. Landscape design around the proposed garage is also being reconsidered.

This project will not be addressing the aesthetic or lighting of the STC; however, the redesign of the proposed garage is no longer providing continuity with the design of the STC and will be a unique structure in the area.

TRAFFIC OPERATIONS FROM PROPOSED GARAGE/TRAFFIC OPERATIONS GENERAL

Numerous individuals expressed concern about the findings of the Traffic Impact Study (TIS), existing traffic operations, and future traffic operations. Specifically:

- *The TIS should include evaluation of the potential build-out and land use of a redeveloped Original Garage site*
- *It is not clear whether the TIS included traffic from currently unoccupied developments, such as the former UBS headquarters*
- *The proposed site fails because all traffic must exit on South State Street; no traffic signal improvements will mitigate this*
- *Bottlenecks for vehicles exiting I95 NB and First Station Place at Greenwich Avenue and seeking access to downtown or the STC is a concern due to additional traffic on South State Street*
- *A second exit to Greenwich Avenue should be considered to help address traffic operations*
- *There should be a third lane from the garage to eastbound South State Street, in place of multi-use path*
- *Eastbound traffic on South State Street is a concern for garage patrons*
- *Pick-up/drop-off traffic on South State Street should be discouraged*

- *Access to the proposed garage for traffic traveling westbound on North State Street is a concern due to constrictions at Washington Boulevard*
- *Washington Boulevard lights should be adjusted to reduce travel times from the garage to Tresser Boulevard*
- *Pedestrians should not be allowed to cross major intersections around the station; the use of pedestrian bridges would help address traffic concerns*

Additionally, local developers have requested background information on the TIS and its findings.

The TIS (was completed to assess the potential traffic impacts and mitigation associated with the proposed garage site and the anticipated site-generated traffic. The traffic volume data for the existing, no-build and build conditions were reviewed and approved by the Office of the State Traffic Administration (OSTA) and were based on recent (2017 and 2018) intersection turning movement counts for 25 intersections and future traffic projections that included forecasted traffic for all approved but not yet implemented major traffic generators (MTGs) in the area. The typical methodology for assessing site-generated traffic impacts does not include assessing the additional traffic impact for vacant developments or potential future development. The site-generated traffic impacts and mitigation for all future developments, including any potential future redevelopment of the Original Garage site, would be assessed separately once the details of the size, land uses, and site access are defined for such developments.

The findings of the TIS showed that the proposed garage is likely to generate fewer than 100 new peak hour trips on the study area network, based on the documented assumptions for redistribution of traffic from existing parking facilities. The impact of the new trips and of the redistributed trips is anticipated to reduce the level of service (LOS) for some of the movements at the study area intersections. The required mitigation for these impacts consists of optimizing signal timing splits for the afternoon peak hour at the intersection of South State Street and Washington Boulevard. No other intersections require specific mitigation to address traffic impacts from the proposed site.

The proposed optimization will provide an LOS E or better for all movements and approaches at the South State Street intersection, and the overall intersection is estimated to operate at LOS D. The resulting 50th and 95th percentile queues for the eastbound left and left/thru/right lanes extend back approximately 350' and 550', respectively. The 95th percentile queue, which is a statistical measure indicating the theoretical maximum queue occurring within the peak hour of study, has the potential to extend back to the proposed garage site driveway, which is located approximately 400' from the eastbound stop bar. In the instances where this queue is reached, drivers exiting the garage will need to rely on eastbound traffic to provide a courtesy gap to allow them to access South State Street. Otherwise, they will need to wait for the queue to dissipate from the South State Street and Washington Boulevard eastbound approach to exit the garage. The signal at South State Street and Greenwich Avenue will help meter the traffic on South State Street, which will also provide more gaps for traffic to exit the garage.

A separate assessment of a potential westbound exit lane from the garage showed that there would be no appreciable improvement in LOS for the South State Street intersections with Greenwich Avenue and Washington Boulevard due to the limited number of patrons assumed to travel west from the study area and due to limitations on complementary capacity improvements on other approaches to these intersections.

Additionally, a separate investigation of the potential operational benefits of concurrent pedestrian phasing at the intersection of South State Street and Washington Boulevard showed further mitigation of traffic impacts and measurable improvement in LOS in the Washington Boulevard corridor; however, pedestrian safety improvements need to be considered at this intersection in order to implement concurrent pedestrian phasing. Opportunities to improve pedestrian safety at the intersection are being further considered as part of the proposed parking garage project; these are in addition to the proposed pedestrian bridge crossing over Washington Boulevard (that would help mitigate the impacts of new garage-related pedestrian traffic in this area) and pedestrian railings along South State Street that would impede and discourage future pick-up and drop-off activities that may disrupt through-traffic operations.

The complete TIS and other project presentation materials have been provided to those requesting independent review of the data and findings.

IMPACTS ON CUSTOMERS

Several individuals questioned how customers may be affected by the proposed project and subsequent demolition of the Original Garage. Specifically:

- *Will Stamford residents with permits have priority to park in the 2004 Garage?*
- *What will happen to existing monthly pass holders?*
- *Will there be a choice between garages?*
- *Will current permit holders need new permits to enter the new garage?*
- *Will people on the current permit waiting list be considered for spaces in the new garage?*
- *Also, it was noted that a dedicated entrance and exit for permit holders is a highly valued perk of 2004 Garage*

Existing permits will be valid for both the 2004 Garage and South State Street Garage. Permit holders will have access to either garage; there will be no priority allocation of spaces to existing permit holders. Customers on the permit waiting list will be allocated permits in accordance with current practice.

See also the response to the *Proposed Functional Plan* comments for additional details on proposed revenue collection systems.

PARKING RATES

Several individuals questioned how the proposed garage would affect the current daily and monthly parking rates.

CTDOT has made no decisions at this time regarding parking fees for the new and existing State-owned parking facilities. It is not anticipated that there will be fees for open bike parking that is proposed for the new garage.

TRAFFIC AND OPERATIONS ON STATION PLACE

Several individuals expressed concern about existing traffic conditions and traffic operations on Station Place adjacent to the station and the Original Garage site. Specifically:

- *The proposed design should address operations on Station Place, including improving access to the remaining 2004 Garage and encouraging the use of Atlantic Street*
- *An improved pick-up/drop-off zone is needed at the station*
- *The ground floor of the proposed garage should be used for pick-up/drop-off activities or transit shuttle use*

The proposed garage project does not include improvements on Station Place that directly address pick-up/drop-off activities in that area. However, the location of the proposed garage on South State Street reduces the amount of station-related traffic using Station Place for access and provides parking opportunities that are removed from the vehicular and pedestrian conflicts on Station Place. Additionally, this project does not preclude the City or State from undertaking projects in the future to address traffic operations on Station Place.

There is insufficient space on the ground floor of the garage to provide reasonable access to the garage, to maintain South State Street, and also to provide a safe and meaningful pick-up/drop-off or shuttle zone; as such, the proposed parking garage plan does not include this provision.

EXISTING STATION ISSUES

Some individuals expressed concerns about the existing station. Specifically noting:

- *The reliability of the existing escalators and elevators is a concern and creates safety and access issues for persons with impaired mobility*
- *The aesthetic of the existing station is undesirable*

There is an on-going CTDOT project to design and implement improvements to the existing escalators and elevators for the station.

The proposed garage project will not change the aesthetic of the existing station; however, the architectural design of the proposed garage and pedestrian bridge will be unique and will help create a new aesthetic context for the facility.