



Patricia Sesto
Director

**Town of
Greenwich
Conservation Commission**
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MEMORANDUM

TO: Katie DeLuca, Deputy Director, Planning and Zoning / Assistant Town Planner

FROM: Aleksandra Moch, Environmental Analyst

DATE: November 16, 2021

RE: 1143 East Putnam Avenue, 1143 East Putnam Avenue LLC, PLPZ 2021 00422.
Site plan by Rocco V. D'Andrea, Inc., dated June 17, 2021 and landscape plan by Environmental Land Solutions, LLC dated July 2, 2021

I have reviewed the above-referenced plans and visited the site. The following comments are offered for your consideration.

1. Resiliency – The proposed development will engage the entire site resulting in nearly 100% of this area being paved. It is imperative to design the new developments sustainably to reduce impacts on human life and the environment rather than worsen them. An increase on 3,269 s.f. of hardscape to build out the property edge to edge does not improve the existing condition of the site but makes it less resilient by increasing the storm water runoff, decreasing natural soil absorption, and providing very little evapotranspiration from vegetative cover.
2. Storm water runoff – The proposed increase in storm water runoff will be mitigated by addressing the runoff peak flow reduction for up to 25-year storm. This year alone Greenwich experienced six significant storm events, including August 21st-23rd Tropical Storm Henri and September 1st-2nd Post Tropical Storm Ida, both of which exceeded the threshold of a storm that had a 1% chance of occurring in any given year, otherwise known as a 100-year storm.

It is important to recall storm water modeling is based on an amount of rain spread out over 24 hours. The modelling does not account for flash flood-type down pours, and/or ground conditions, such as saturated or frozen ground.

The drainage overflow will be directed into the stream, which is piped under the northwestern property corner. Data has not been provided to detail at what size storm this pipe will over flow through the proposed parking lot. Models to project the culvert capacity should go beyond the traditional scenario of an amount of rain over a 24-hr period and should be expanded to include flash flooding events, such as was the case with Ida and thunderstorm cloud bursts in recent years.

3. Storm water quality – The proposed storm water management plan warrants 80% of the total suspended solids will be removed from the storm water runoff. This is a minimum standard and the applicant should detail why greater efficacy in the stormwater management plan is not feasible. If projects merely attain the minimum standard, the remaining 20% of suspended sediment will pollute the receiving surface water. In addition, the system is not designed to mitigate for water born pollutants, such as road salts, hydrocarbons, heavy metals, pesticides, etc. A pollutant renovation analysis for each sub-watershed should be submitted to allow for a comprehensive understanding of the resulting stormwater quality to be discharged from the development.
4. Construction phase – The proposed soil erosion and sediment control plan shows a line of silt fence running along the entire property line including across the driveway. The applicant should:
 - Show the construction access,
 - Location of the stockpile area(s), and
 - Define adequate space for contractor parking. The basis for what the applicant determined what was “adequate” parking should be conveyed to the commission.
5. Site revegetation – The proposed site plan shows none of the existing trees to be removed during the construction activities. This depiction is at odds with the planting plan which does not incorporate the existing vegetative cover, suggesting none of the trees will be preserved. It is recommended all the existing trees be preserved. Additionally, the canopy of trees just off-site will conflict with the building. This situation highlights the intensity of the proposed development and the impacts that will necessarily come to pass off-site.

The proposed strip of land surrounding the structure is only 5 feet wide. This width may be further narrowed by curbs and drainage pipes. The proposed plantings show large trees and shrubs which require space of up to 11 feet (rhododendron 'English Roseum') and 25-35 spread for the river birch. Several of the shrubs will be planted under the balconies on the northern side of the building with inadequate light and space. The landscape plan does not accurately reflect the realities of having the structure come to within 5 feet of the property line.

6. Roof garden – The proposed development offers no recreational space to the residents. Located near a busy street, resident will have little walking or play space for the families and small children. The proposed roof garden could satisfy the need to a limited extent. A more detailed plan for the roof top should be provided that incorporates a functional residential green space with environmental benefits in mind. Full sun exposure should be mitigated with green infrastructure providing shade alleviating the heat island effect over the concrete surface. The plant species should include at least 25% of native plant material attractive to local birds and pollinators. The green roof will assist in providing needed cooling mechanism to reduce the need for heating and cooling of the building. Storm water management should also be incorporated to the design. In order to achieve a meaningful mitigation, the media growth should be at least 6” deep to allow for larger plants to grow and more diversity among the plant species.
7. Natural resources – The site is adjacent to a large wetland/watercourse area located to the north. This fairly diverse wetland habitat will be impacted by an altered solar profile from this tall structure. The applicant should provide some remedies to minimize the impact.
8. Alternative transportation modes – The six proposed affordable units should be supported by bike racks to facilitate the need for alternative transportation. Also EV charging stations should be provided for at least 10% of the proposed parking spaces, with the foundational utilities “stumped in” for a total of 30%.

9. Summary – The proposed site redevelopment will generate impacts which will reach beyond the property lines. The large size of the structure and intensive paving of the area will result in several impacts to the natural environment and the neighborhood. The impacts include, but may not be limited to, increase in flooding, heat island effect, decline in storm water quality, excessive wetland shading, parking shortage during the construction phase and beyond, and increased light pollution. The project does not provide an adequate mitigation for the above impacts and there is no balance between the green space and paved areas. The site design lacks resiliency needed to address the climate change.

cc: Conservation Commission