



Patricia Sesto
Director

**Town of
Greenwich
Conservation Commission**

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MEMORANDUM

TO: Patrick LaRow, Director of Planning and Zoning / Zoning Enforcement Coordinator / Town Planner

FROM: Aleksandra Moch, Environmental Analyst

DATE: February 16, 2023

RE: Town of Greenwich; application PLPZ 2022 00546, for a Zoning Text Amendment to amend Sec. 6-5.(a)

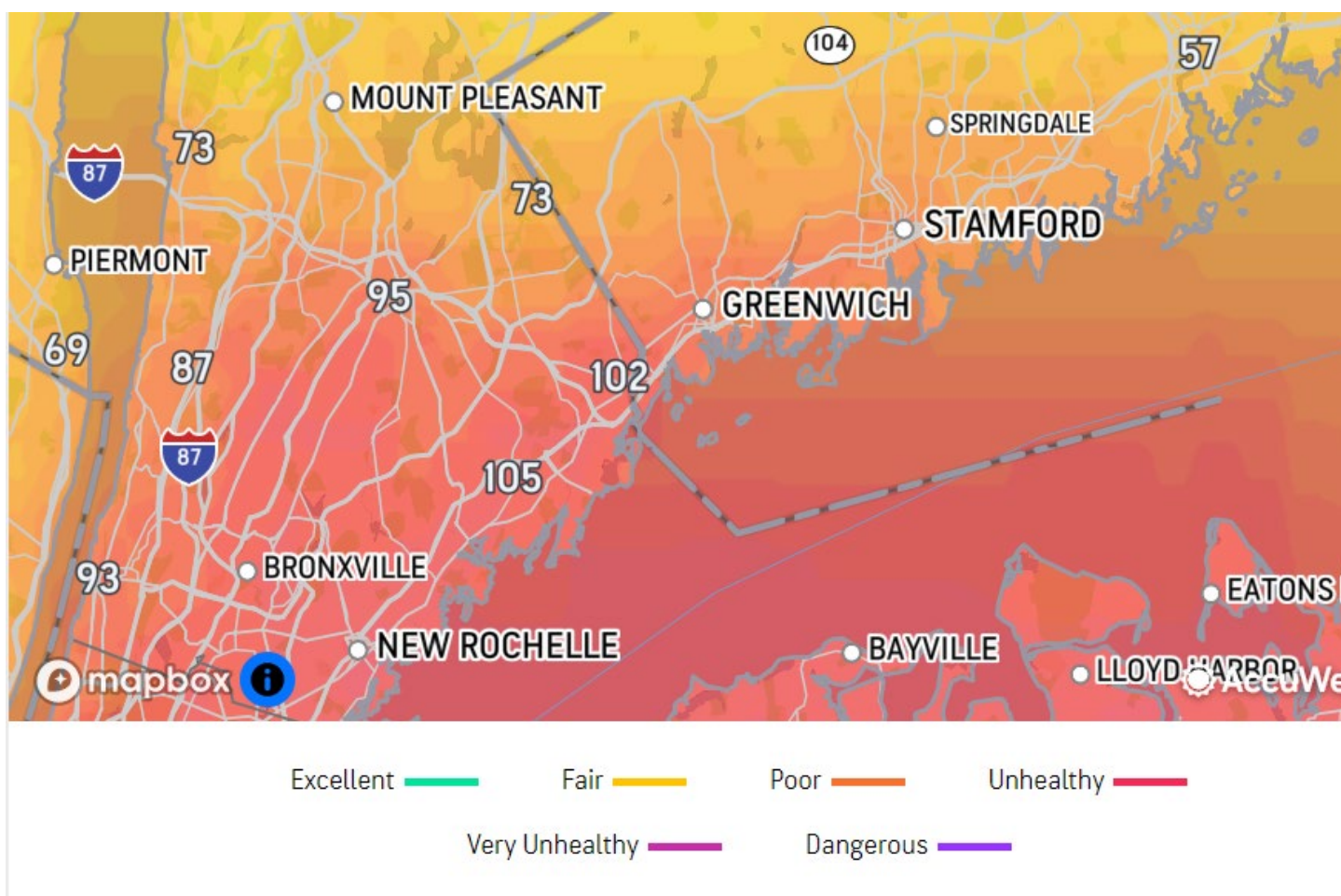
The CC staff applauds the P&Z Commission for the proposed Zoning Text Amendment. This is a huge step towards addressing the air-quality issues, reducing carbon emissions, increasing sustainable living options and environmental health. After a thorough review of the proposed language, the following comments are offered for your consideration:

1. The proposed amendment is well thought out, but it does not go far enough. As governed by the State, the proposed regulations are limited to the new parking areas accommodating 30 and more cars. From the state perspective this may have a wide implication; however, Greenwich is a very densely developed town lacking large areas suited for a sizable development. Construction of new schools or their renovations do not happen often. Based on the size limitation, the new law would not apply to most of the new projects making no difference in offering incentives for purchasing EVs or accommodating current EV owners.
2. Everyone has the “right to charge.” Under the Connecticut Clean Air Act, landlords and management companies can no longer place unreasonable restrictions on the installation or use of EV charging stations for common or unit-specific parking spaces. This law opens the door for tenants to own an EV; however, it also comes with complications. Previous EV owners may create a conflict for the next user of a dedicated parking space who does not own an EV and does not wish to maintain an inherited EV charger. To address this shortcoming, the new amendment should focus more on the multi-unit developments requiring at least one dedicated charger accessible to all building tenants of housing more than five apartments. Adding this to the new language would make a real difference in the number of EVs on the road, while addressing the need of the current EV owners and to allow more drivers to make the switch to an emission-free vehicle.
3. The “right to charge” puts a burden on the tenant to install an EV charger. In most cases such need may be cost prohibitive. To address this issue, the language of the proposed amendment should require improving new parking areas with the EV-ready infrastructure, which will allow an easy and

inexpensive hook up for the new chargers needed in the future. It is recommended to add language including at least 10% of the parking spaces serving a housing building with more than five residential units to be wired and EV ready.

4. As of commercial parking, the recommended language should read: “one charger should be installed per every 10 parking spots and 20% of the parking area made EV ready for the installation of the future charging stations.” This change would make a better sense for Greenwich EV drivers and cover more projects.

These new regulations are crucial to address our air pollution which is one of the worse in the nation. The Air Quality Index for Greenwich on February 16, 2023, was recorded between “unhealthy” within the southern portion of the town to “fair” in backcountry area. Per Plum Lab tracking the real-time air pollution data Air Quality index defined as “Unhealthy” means “*Health effects can be immediately felt by sensitive groups. Healthy individuals may experience difficulty breathing and throat irritation with prolonged exposure. Limit outdoor activity.*”



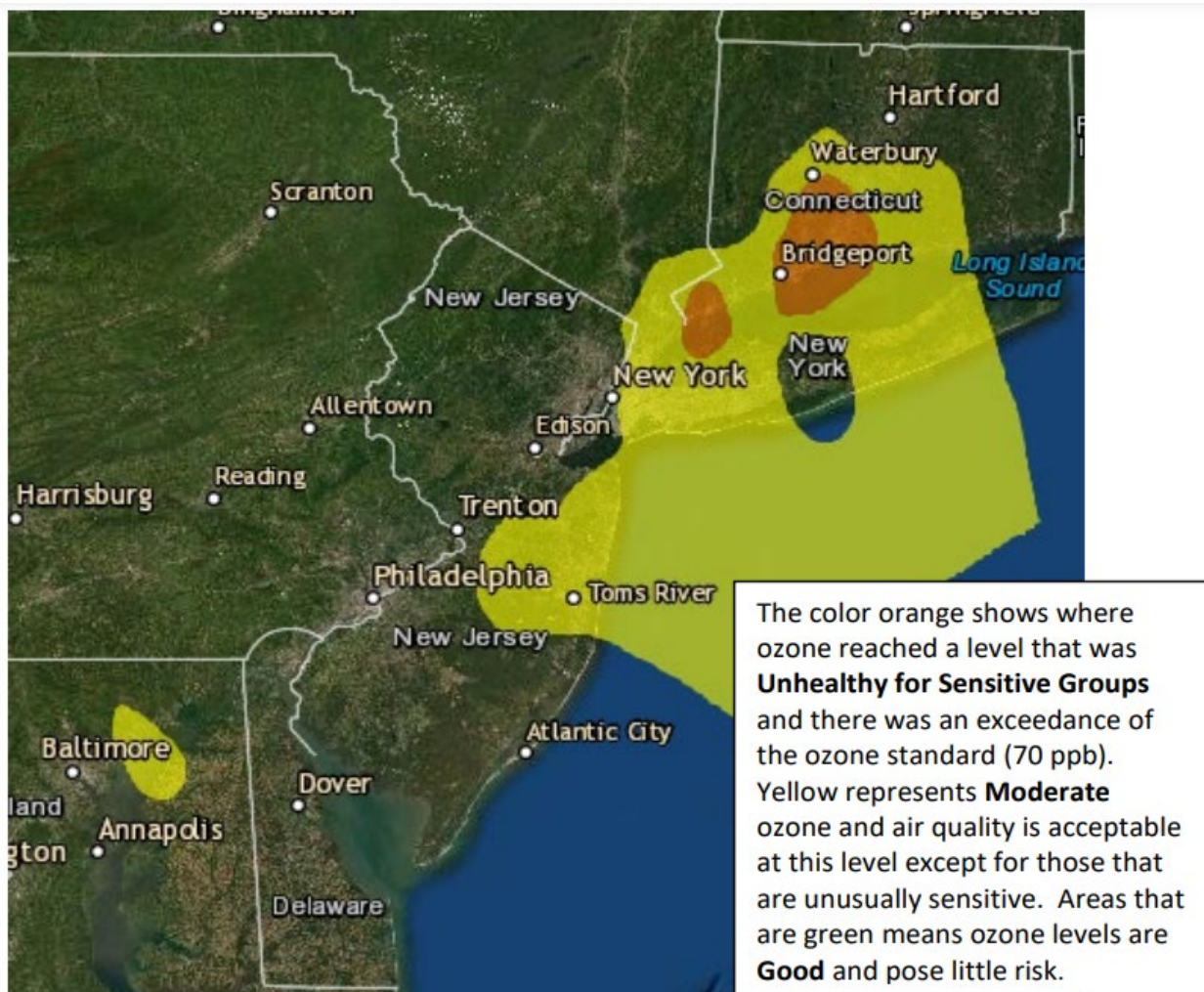
The major pollutant in Greenwich is ozone. Ground-level ozone, what we breathe, is formed mainly from photochemical reactions between volatile organic compounds (VOC) and nitrogen oxides (NOx). Nitrogen oxides result primarily from high temperature combustion. Significant sources are power plants, industrial furnaces and boilers, and motor vehicles. The transportation sector is responsible for over 55 percent of NOx total emissions inventory in the U.S.

For example, a measurement taken on August 24, 2020 (Table 2) show there was exceedance in Greenwich of the National Ambient Air Quality Standard (NAAQS) for ozone (daily maximum 8-hour average of 70 ppb). The number of days ozone was exceeded in CT between January 1st and August 24th, 2022, was 17. It should be noted; the monitoring was done during the COVD time when the use of vehicle was lower than an average.

Table 2. Ozone Concentrations at Out-of-State Monitoring Stations in New Jersey’s Ozone Non-Attainment Areas on 8/24/2020

STATE	STATION	Daily Maximum 8-Hr Average (ppb)
CT	Danbury	52
CT	Greenwich	74
CT	Madison-Beach Road	65
CT	Middletown-CVH-Shed	55
CT	New Haven	78
CT	Stratford	73
CT	Westport	68

Ozone Air Quality Index for August 24, 2020



Source: www.airnow.gov

Poor air quality is not only dangerous for the health of human beings, but it also impacts the local fauna and flora. Ozon negatively affects plant species by reducing photosynthesis, which plants use to convert sunlight to energy to live and grow. It also increases plants' risk of disease, damage from insects, negative effects of other pollutants, and harm from severe weather. Stressed plants pass their stress onto the ecosystem they support. In long term this can result in changes to plant diversity, habitat quality, and water/nutrient cycling. Like in humans, ozone impacts wildlife causing respiratory issues, cancer, and changes in migratory patterns.

The proposed zoning text amendment if done right, could be instrumental in tackling these issues. More charging stations and more convenient and affordable access to them will encourage vehicle owners to make better choices. Replacing gas powered vehicles with emission free alternatives at higher rate will offer a meaningful support to sustainability and environmental health.

cc: Conservation Commission