

EXECUTIVE SUMMARY
THE HOUSING AUTHORITY OF THE CITY OF NORWALK
APPLICATION FOR SIGNIFICANT ACTIVITY
SUNCREST ROAD AND WEST CEDAR STREET – NORWALK, CT
CITY OF NORWALK – CONSERVATION COMMISSION
October 6, 2020

I. Overview

The Housing Authority of the City of Norwalk (hereinafter “NHA”) is the owner of 25+/- acres of real property located on Suncrest Road and West Cedar Street in Norwalk, CT (hereinafter the “Property”). Commonly known as “Colonial Village,” the Property is improved with 19 detached residences constructed in 1951, which offer 200 units of affordable housing, along with on-grade parking spaces, play areas and an open field on the northern portion of the site.

II. Project

The NHA proposes to develop the eastern approximately eight (8) acres with 18 new buildings, which would contain 69 new apartments (one, two- and three-bedroom units). In addition, the proposal includes new drainage, landscaping, lighting and parking, as well as a quarter-mile long walking trail and community center for tutoring, activities, on-site Property management and other events. A variety of units are proposed including market rate, workforce, HUD subsidized and supportive.

II. Wetlands and Watercourses

The eight acres to be developed are generally open and cleared. There is an 810-foot watercourse and a wetland corridor along the eastern property boundary. On-site wetlands and watercourse total 25,713+/- sq.ft. (0.59+/- acres). Upland review areas extend 50’ from the wetlands and 100’ from the watercourse. Refer to Landscape & Lighting Plan (L1.01) by Environmental Land Solutions (ELS), and letter to Norwalk Conservation Commission/Inland Wetland Agency by Tighe & Bond, dated July 22, 2020 (Wetland Delineation Report).

III. Wetland Functions

The onsite wetlands in their current condition provide a limited range of functions due to years of disturbance and neglect, a developed buffer on both sides including neighboring properties to the north and east, manmade debris and lack of native vegetation. These existing conditions have impacted and diminished the wetlands’ functions. However, they continue convey stormwater flows, trap sediments, uptake nutrients, producing food and create a wildlife habitat. The wetland corridor is also a source of groundwater discharge. (Refer to ELS & TB reports for specificity and more detailed information).

IV. Wetland Impacts

Aside from hand work for removal of debris, invasive plants and replanting of native plants, the development was planned to eliminate any activity in existing wetlands and watercourses, and to minimize activity and disturbance in upland review areas. There is no proposed development in, no alteration or loss of wetlands or watercourse, nor any direct impacts to wetland resources. The wetland mitigation work along the walking path focuses on removing invasive plants, debris removal and replanting native species extending slightly into the wetland (880± sf) behind buildings 8, 9 & 10. Work in the wetland is restricted to hand work.

Nearly all of the buildings will be located beyond the 50’ wetland upland review area, with the exception of Buildings 4 & 8, which are proposed to be located 48’ from the wetland resources. In addition, portions of the walking trail, rain garden, drainage improvements, grading, planting, and wetland mitigation, will also occur in the 50’ upland review buffer. Activity and structures are proposed within the 100’ watercourse upland review area. A total of 61,945+/- sq.ft (1.4+/- acres) of upland review area will be disturbed for these activities, but there will be no permanent loss of wetlands.

V. Stormwater Management

All of the dwellings are proposed to be served by city water and sewer. The stormwater management system has been designed to reduce both peak flow and volumetric runoff from the existing to proposed conditions for the 2, 5, 10, 25, 50 and 100-year storm events. A comprehensive engineered stormwater system has been designed to collect, treat, and detain runoff. Runoff from site roadways and walkways are proposed to be directed to roadway catch basins fitted with deep sumps to trap road sediments. The majority of the pavement and walkway runoff will flow across permeable pavement prior to entering the drainage

system, for additional stormwater treatment. Thereafter, collected roadway and walkway runoff, as well as runoff collected from all building roofs are proposed to be filtered through hydrodynamic separators to remove sediment, vehicle oil and litter prior to discharging into underground galleries or a rain garden. These “treatment train” measures are designed to treat water quality as well as to mitigate runoff peak flows and volumes, to protect downstream storm drainage systems as well as wetland and watercourse resources. (Refer to Engineering Report by Tighe & Bond for specifics on the stormwater management system).

VI. Wetland and Watercourse Mitigation Measures

In order to minimize or avoid adverse impacts to regulated areas, the Applicant has incorporated best management practices (BMPs) and low impact development (LID) measures into the development plan of the site including:

- Erosion and sedimentation controls including silt fencing, anti-tracking pads and site watering are proposed to trap sediments within flowing surface water, remove sediments from tires of construction vehicles and prevent dust
- Catch basins with deep sumps to trap sediments from roadway stormwater runoff to improve water quality
- Hydrodynamic separators to trap road sediment and pollutants from stormwater runoff
- Underground detention galleries to store and infiltrate stormwater runoff into the ground, reduce flooding, recharge groundwater, dissolve pollutants and reduce thermal pollution from heated runoff from pavement areas.
- Buffers planted with native species to offer wildlife habitat, improvements to water quality by nutrient removal from stormwater from plant uptake, overland stormwater flow to trap sediments and provide infiltration
- Consideration of wetland demarcation to provide visual and physical barriers to protect the natural wetland buffer
- Rain garden which will help cleanse stormwater runoff, reduce stormwater volume and provide wildlife habitat.
- Pervious pavement in parking areas

VII. Standards of Review

“...[I]n considering an application for a permit to engage in any regulated activity, a local inland wetland agency must, under [CGS] 22a-41, take into account the environmental impact of the proposed project, it is the impact of the regulated area that is pertinent, not the environmental impact in general.” AvalonBay Communities, Inc. v. Inland Wetlands Commission, 226 Conn. 150, 160-61 (2003).

In considering applications before it, the Commission is required to take into consideration the following concepts and the Applicant’s responses thereto:

*Environmental impact of the proposed regulated activity on wetlands and watercourses

Applicant’s response: *As previously noted, nearly all buildings will be located beyond the 50’ wetland upland review area with the exception of Buildings 4 & 8 which are proposed to be located 48’ from the wetland resources. from the wetlands. There are no direct impacts or any disturbance to site wetlands or watercourse as part of this development, no loss of wetlands, no alteration of wetlands or watercourses. Secondary or indirect impacts have been carefully reviewed and mitigated.*

*Applicant’s purpose for and any feasible and prudent alternative to the proposed regulated activity which would cause less or no environmental impact to wetland or watercourses

Applicant’s response: *The purpose of the regulated activity is to create a minimally impactful multi-family development to provide much needed affordable housing. The plan takes great care in limiting the impact to the wetlands and watercourse, if any at all exists, while proposing a development of eight (8) acres. The impacts have been evaluated by qualified professionals who determined that as proposed, the development lessens environmental impacts to the maximum extent possible. Moreover, the plan proposes substantial improvements by way of removal of debris and planting of native, non-invasive species, in a wetland corridor that has been neglected over time. This proposal represents the most feasible and prudent option, while balancing the needs and property rights of the Applicant.*

*Relationship between short-term and long-term impacts of the proposed regulated activity on wetlands or watercourses

Applicant’s response: *Short-term impacts include activity in the wetlands to remove debris and invasive species (work by hand). In upland review areas, activity will consist of installation of landscaping, an on-grade trail and portions of a few of the structures. Best management practices (BMPs) and low-impact development strategies include a rain garden, underground infiltration galleries, hydrodynamic separators, pervious pavement, planted buffers, erosion and sedimentation controls and others which will avoid, eliminate or minimize short and long-term direct impacts. Long term, the wetlands and watercourse will become more vibrant and their functions will be improved.*

*Maintenance and enhancement of long-term productivity of wetland and watercourses

Applicant’s response: *As noted herein, the wetland/watercourse corridor on the property has been neglected. There exist invasive, non-native species, debris etc. which impair the functions and values of the corridor. More than 200 native*

plantings are proposed within the upland review area, along with a rain garden and other best management practices that will serve to treat stormwater runoff.

*Irreversible and irretrievable loss of wetland or watercourse resources which would be caused by the proposed regulated activity

Applicant's response: *Again, the proposal does not involve any direct impacts to or any disturbance of the onsite wetlands or watercourse, so there is no anticipated loss of wetland or water course resources. Activity is proposed within the upland review areas, but has been designed to enhance, improve and protect onsite resources. Further, the proposal does not foreclose a future ability to protect, enhance or restore wetland resources, since no wetlands would be directly impacted or disturbed.*

*Character and degree of injury to or interference with safety, health or the reasonable use of property caused or threatened by the proposed regulated activity

Applicant's response: *The proposal would not result in any injury to or interference with safety, health or reasonable use of property.*

*Measures which would mitigate the impact of any aspect of the proposed regulated activity

Applicant's response: *As indicated, the proposal involves various design concepts, low impact development strategies and best management practices to mitigate impacts to the maximum extent practicable.*

*Impacts of the proposed activity on wetlands or watercourses outside the area where activity is proposed, which may have an impact on wetlands and watercourses.

Applicant's response: *Because indirect impacts have been thoughtfully minimized, the proposal is not anticipated to cause or threaten any injury or interference to use of property outside the area proposed for development. Instead, the improvements to the onsite wetlands and watercourse are positive attributes for the Applicant's property as well as for abutting neighbors, upon whose land the upland review areas extend.*

Respectfully submitted,
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