

**CITY OF STAMFORD**

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**RECEIVED**

JAN 19 2022

**ZONING BOARD**

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**INTEROFFICE MEMORANDUM**

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January 19, 2022

To: Vineeta Mathur Associate Planner

From: Susan Kisken P.E. - Coordinator of Site Plan Reviews and Inspections

**Subject:**

**- Text Change  
Zoning Application No. 222-01**

The Engineering Bureau of the City of Stamford has reviewed the above-mentioned Application 222-01 for Text Change associated with the Omnibus Text Change Clean-up 3 to reorganize the City of Stamford Zoning Regulations, clarify certain definitions, procedures, update and add new definitions, procedures and Zoning districts and delete certain sections, and offers the following comments:

The Engineering Bureau encourages reductions in impervious coverage, minimizing site disturbance, improvements in water quality, and the use of Low Impact Development (LID) which are consistent with the City of Stamford's MS4 Permit. The goals of the MS4 Permit include reducing impervious surface and directly connected impervious areas and promoting infiltration. Expanding any requirement for impervious coverage reduces the ability of a site's natural infiltration.

Definitions - Height of Accessory Structure - Clarify average grade level of the ground surface, similar to Building Height.

Definitions - The definition for "Retaining Wall" should be expanded to include the definition used in the State of Connecticut Building Code.

Permitted Obstructions - Any obstruction into the City ROW should not block walkways and ADA requirements. Clarify if utilities attached to the building are allowed to encroach into the City ROW. This would include meters, Siamese connections, regulators, etc.

Section 10.H - Changes in use and parking should be considered. This would include converting commercial buildings to residential buildings. The City of Stamford Stormwater Drainage Manual ( page vii) requires improvements to existing parking lots such as water quality improvements which may include oil separators, catch basin inserts, and rain gardens.

Section 19.H - The Engineering Bureau does not endorse a General Development Plan approval without

referral to ALL agencies. Any development plan should include a feasibility study of the infrastructure to support the plan and determine that there will be no adverse impacts. New and expanded buildings may have a denser occupancy and a variety of uses/programs which may tax the existing infrastructure. There are many sites that are environmentally sensitive and/or are located within a Flood Prone Area or Coastal Area. These projects should be referred at the beginning of the process as they are subject to more stringent requirements. A development plan with its programming and layout of the buildings and their infrastructure is critical to ensure the best quality standards are met, maintained and improved. There may be opportunities to improve water quality of existing conditions such as the introduction of oil/grit separators and rain gardens to filter runoff from existing and proposed parking areas.

Section 19.H.3.c - The Existing Conditions Map, at minimum, should comply with the check list found in the City of Stamford Stormwater Drainage Manual and shall include but not be limited to the identification and location of wetlands, tidal wetlands and watercourses.

Section 19.H.3.f - Stormwater management including hydrology and hydraulics should be addressed as it relates to quantity and quality, specifically addressing the requirements in the City of Stamford Stormwater Drainage Manual which was established in support of the City of Stamford's MS4 Permit. Often times, a site is limited in area available for infiltration. All testing and stormwater management should be shown on the plan for the GPD. As previously stated, the Engineering Bureau encourages reductions in impervious coverage, minimizing site disturbance, improvements in water quality, and the use of Low Impact Development (LID) which are consistent with the City of Stamford's MS4 Permit. Section 19.H should reference the City of Stamford Stormwater Drainage Manual.

Any off-site improvements required to support the GPD or any other commitments should be initiated in the earliest of phases of the GPD.

Section 19.H.5 - The validity term for GDP's seems extensive; ten years with a possible additional ten years amounts to twenty years. Many changes can occur within this time period that can affect the general design; climate change for one. The recent introduction of the City of Stamford Stormwater Drainage Manual had the potential of affecting many downtown properties which resulted in a influx of applications to avoid stricter stormwater management requirements. As regulations evolve to further protect the environment, there may be more restrictions which could potentially affect the development of a property. This would also include changes to any State or Federal requirements such as FEMA.

The Engineering Bureau does not endorse the proposed text changes at this time until the above comments are considered and modifications to the text changes are made.

Thank you for the opportunity to review this application and if you have any questions, please call me at (203)977-6165.

CC: Ralph Blessing

Reg. No. 23