



City of Stamford
ENVIRONMENTAL PROTECTION BOARD
INTEROFFICE CORRESPONDENCE

June 1, 2023

To: Vineeta Mathur, Principal Planner
Land Use Bureau, Stamford

From: Robert Clausi, EPB Executive Director 

Subject: ZB Application 223-22 – City of Stamford
Proposed Text Changes

EPB staff has reviewed the above-referenced application to make text changes to the Zoning Regulations and has no objection to the idea of establishing a uniform definition of “Substantial Renovation and Alteration” in the Zoning Regulations, provided the definition does not conflict with the federal definition of “Substantial improvement”¹ under which the City’s Flood Prone Area Regulations are administered.

The draft definition being considered by the Zoning Board generally conforms to the federal definition. However, the phrase “infrastructure or mechanical devices” seems to be an unnecessary inclusion. “Infrastructure” is a vague, undefined term that can encompass items that are not material components of a building or structure. “Mechanical devices” seems redundant since they are a subset of the types of improvements that can be made to a building or structure. Removal of this phrase from the definition is recommended.

The Zoning Board should be made aware that applicants for flood-prone area permits currently often submit an independent appraisal to establish the “market value” of the structures they plan to renovate. Such appraisals are generally higher than the appraised value of the structures as shown on the

¹ Title 44 “Emergency Management & Assistance”, Chapter 1 “Federal Emergency Management Agency/Department of Homeland Security”, Subsection 59.1 “Definitions” of the Code of Federal Regulations (as amended):

Substantial improvement means any reconstruction, rehabilitation, addition, or other improvement of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure before the “start of construction” of the improvement. This term includes structures which have incurred “substantial damage”, regardless of the actual repair work performed. The term does not, however, include either:

- (1) Any project for improvement of a structure to correct existing violations of state or local health, sanitary, or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions or
- (2) Any alteration of a “historic structure”, provided that the alteration will not preclude the structure's continued designation as a “historic structure”.

Stamford tax records and therefore provide more leeway before triggering the requirement to bring the structures into compliance with all current regulations. Specifying that applicants use the appraised value of the structures as shown on the Stamford tax records, as is done in the proposed definition, is likely to result in a higher percent of projects meeting or exceeding the 50% trigger. This stricter limit on baseline valuation of structures does not conflict with FEMA regulations since FEMA allows localities to adopt higher floodplain management standards than the NFIP. EPB supports this tightening of the appraisal requirement since it will accelerate flood proofing and improve public safety.

The National Flood Insurance Program Coordinator for the State of Connecticut has reviewed the draft definition and determined it will be acceptable after the recommended edit is made.

Thank you for the opportunity to provide these comments.

MAYOR
Caroline Simmons



**CITY OF STAMFORD
PLANNING BOARD
LAND USE BUREAU**
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May 31, 2023

Mr. David Stein, Chair
City of Stamford
Zoning Board
888 Washington Boulevard
Stamford, CT 06902

RE: ZB APPLICATION #223-22 - STAMFORD ZONING BOARD - Text Change

Dear Mr. Stein & Members of the Zoning Board:

During its regularly scheduled meeting held on Tuesday, May 23, 2023, the Planning Board reviewed the above captioned application referred in accordance with the requirements of the Stamford Charter.

The purpose of this Text Change is to have a uniform definition for Substantial Renovations and Alternations in the Zoning Regulations and to clarify when requirements for providing sidewalks, electric vehicle charging and bicycle parking for existing developments are triggered.

This application is aligned with the Master Plan, specifically, supporting the following Master Plan Policies and Strategies:

- Policy 4C: Improve circulation and mobility within Stamford.
- Policy 6B: Preserve existing and create new affordable housing.
- Policy 7G: Create compact and complete communities.

After a brief discussion, the Planning Board unanimously voted to recommended *approval* of **ZB Application #223-22** and this request is compatible with the neighborhood and consistent with the 2015 Master Plan.

Sincerely,

STAMFORD PLANNING BOARD

A handwritten signature in blue ink that reads 'Theresa Dell' followed by a stylized initial 'a'.

Theresa Dell, Chair

TD/lac

MAYOR
CAROLINE SIMMONS

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INTEROFFICE MEMORANDIUM

TO: Zoning Board Office

FROM: Frank W. Petise, PE
Transportation Bureau Chief


Luke Butterwieser
Transportation Bureau Staff

DATE: June 7, 2023

RE: Zoning Board Applications 223-22

Application #223-22

888 Washington Blvd
City of Stamford

The Transportation, Traffic & Parking Department (TTP) has reviewed the following documents:

- Zoning Board application received May 10, 2023
- Proposed text change

The proposed text changes better clarify for staff and the public the applicability and requirements for implementation of Section 12. The proposed Section 12.K regulations increase the Department's flexibility in maximizing sidewalk construction to further build out and enhance the City's sidewalk network. The changes to Section 12.L relating to EV charging requirements and increase and streamline the EV charging requirements which further the City's goal of expanding Electric Vehicle use in Stamford. The Department has no comments on this text change and is supportive of them.

JUN 7 2023

ZONING BOARD

Briscoe, Tracy

From: Kristin Floberg <kfloberg@westcog.org>
Sent: Tuesday, May 9, 2023 3:11 PM
To: Briscoe, Tracy; Mathur, Vineeta
Subject: RE: City of Stamford - Zoning Board - New Application 223-22
Attachments: 223-22 -Cover Letter.pdf; 223-22 - Application.pdf; NARRATIVE Sidewalks Bikes EV 2023-05-05.pdf; TEXT Sidewalks Bikes EV 2023-05-02.pdf

To: Vineeta Mathur, Principal Planner

From: Kristin Floberg, Senior Planner

Re: CT Statutory Referral to WestCOG from Stamford - Attached Zoning Amendment

Date: May 9, 2023

Thank you for submitting the attached referral to WestCOG.

The opinion of WestCOG staff is that the proposal is of local interest and with minimal intermunicipal impact. Therefore, it is not being forwarded to adjacent municipalities and the regional staff is making no comment.

From: Briscoe, Tracy <TBriscoe@StamfordCT.gov>
Sent: Monday, May 8, 2023 2:12 PM
To: Kristin Floberg <kfloberg@westcog.org>
Subject: City of Stamford - Zoning Board - New Application 223-22

Hi Kristin,

Please see attached for your review and comments.

Thanks Tracy