

February 15, 2006

Michael B. Greene,  
Director of Planning and Zoning of the City of Norwalk

Dear Mr. Greene,

I am a landscape architect and an Advisory Board Member of the Eastern Norwalk Neighborhood Association (ENNA). Attached is a one page text document of our concerns regarding riverfront open space as it is designed for the proposed Gibbs College development that was presented to us on February 8th.

I am hoping to attend the public hearing tonight but I may not be able to due to work responsibilities. I am hoping you can take a moment to review the document.

Thank you very much.

Nick Overall  
**Advisory Board Member ENNA**

Feb 13, 2006

### **Critical Views of the Old Gibbs College Site**

Even though the February 8<sup>th</sup> presentation of the redesigned proposal for the mixed-use building on the old Gibbs College site satisfied some staunch critics, there were still some concerns from Norwalk citizens. Several expressed concern of future excessive vehicular traffic. I am concerned that this development will be unsightly from across the river and that the developments at the river edge will not stand the test of time.

The city of Norwalk Masterplan envisions a city with a vibrant waterfront along its harbor and lower parts of the Norwalk River. The current Gibbs College proposal has not addressed the quality of the riverfront. The proposed 12' wide walkway / bikeway is less than the city required 15' wide. It will be constructed of plastic lumber decking supported on piles approximately 3 feet above the mean high water line. Is a 9' high (at low tide) deck on pilings shading a muddy edge an acceptable riverfront edge? What kind of support structure will we see? A frequent rower of the river said that a new development north of this site has a very ugly support structure facing the water. Will the deck, railing and planter materials hold up over time to public use?

Separating this walkway from the condominium parking lot is a proposed 10' high plain concrete retaining wall with planters at the walkway level. This will be a hot, dry space in summer and it will not be an attractive view from the river or from the north side of the river. The planters will have to be maintained in perpetuity to keep plants alive.

According to the proposal, on top of this concrete retaining wall will be widely spaced shade trees, the parking lot and then the backs of the buildings. More plantings between the parking lot and the walkway are necessary or else the view from the river will be less attractive than its current condition.

The proposed design has responded to the community concerns about views to the river from East Avenue and storm water requirements but it has not given the Norwalk Riverfront front the high quality design it deserves. It would be good for the City of Norwalk to see more detailed plans for this project. The city of Norwalk deserves quality riverfront design similar to other urban riverfronts such as the successful San Antonio Texas riverfront or Allegheny Riverfront Park in Pittsburgh. The Norwalk River is a real estate asset and quality open space close to the river will be an asset to the condominium residents and to the City of Norwalk.

Nick Overall

Advisory Board Member of the Eastern Norwalk Neighborhood Association

February 15, 2006

To: Zoning Commission  
City of Norwalk, CT

I am speaking as member of Eastern Norwalk Neighborhood Association's Board of Directors with the Board's support of my position. It is part of the ENNA mission statement to protect the environment, and the point of my comments and this document is to show that the City should do more assessment on environmental impact.

I was very pleased to see that the Gibbs property development proposal meets criteria for the Village District to preserve the character of the area and protect the views to the river. I'd go so far as to say I wish other developer's would take time to make such commendable changes.

However, my focus here is on the environmental protection and improvement of the harbor's ecosystem, specific to what falls under the Special Permit and The Coastal Site Plan Review. I don't believe the standards of the permit have been met yet, therefore I would suggest that the record is kept open until they are met, or suggest you deny the application without prejudice until the standards are met and the public has had a chance to review and comment on any new plans in the file.

Should you decide to approve the Permits, I suggest you require the following conditions be met:

- 1) The City, as charged with protection of harbor and environment, should require a DEP/Coastal Area Management referral (request for their opinion). as part of this application. Although the applicant is not required to do an environmental study, I see it as the City's responsibility to demand this layer of information before approval. Will this development comply with the intent of Coastal Area Management, where a balance of environment and impact is required?
- 2) **Public Access.** Although I appreciate the inclusion of public access to waterways, as Coastal Area Management and impending Master Plan encourage it, I don't believe "Public Access" should ever supercede the environmental impact concerns. There is no way to know what the impact will be on the harbor's edge eco-system without proper study. The applicant is not required to do such a study, but the City should require someone other than the applicant, to do a professional environmental impact study before approval for Permit, as the City is charged with protection of harbor environment.

- 3) **Retaining Walls/Boardwalk**: I think the city needs to request the developer to revise the design. The currently proposed retaining wall design is not in harmony with the environment. Changes should be made for the following reasons:
- a. The wall as described will be an eyesore to anyone on the river, or across from it. Even with cladding of some sort, there is a better environmental approach to be had, which would also better insure the strength of the soils. An earthen slope construction that allows for more planting in soils, will increase the beauty, habitat to wildlife, shading in summer, and can improve natural filtration of storm-water runoff as well. There are natural fiber “green building” materials that plants can grab, giving the earthen wall the necessary strength. There’s a better way that uses primarily terraced, planted, earthen slopes.
  - b. The planted boxes on the boardwalk are problematic in that they will require ongoing irrigation with fresh water. A better solution, and helpful to the living organisms on the river’s edge, would be to plant sustainable plants above and below the walkway, adjusting the position of the boardwalk. I don’t believe the intent of the Coastal Area Management Act is to create public access at the expense of the environment.
- 4) **Harbor Commission Comments**: While I’m glad the Harbor Commission made the comment on file in accordance with their Harbor Plan, they are part of the City’s team that is supposed to take responsibility to examine impact of development on the harbor resources including mudflats and the harbor’s edge. The Harbor Commission should ask for a city expert to do an environmental impact study, instead of just relying on study from the applicant.
- 5) **Shellfish Commission comments** should be included in the application as well. Again, I think the record should be kept open, or this application denied without prejudice until such time as Shellfish Commission comments, and the public has a chance to review. The applicant is not required to seek this, but the City can and should require this as part of the City’s assurance of environmental protection.

In summary, in my opinion, the City needs to dig a bit deeper into the environmental impact of this project’s specifics, and has missed the noted opportunities to do so. The developer has taken the time and effort to plan a structure that will enhance the area. It would be a shame if the City did not take the extra step to ensure the protection of our fragile riverfront environment. I hope the City will pursue the conditions I’ve mentioned above.

Thank you very much.

Sarah Hunter  
Eastern Norwalk Neighborhood Association  
Member Board of Directors