Blight Determination
Wall Street - West Avenue Redevelopment Area

Prepared for: Norwalk Redevelopment Agency
Prepared by: Regional Plan Association
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Summary of Findings

Regional Plan Association (RPA) has conducted an analysis of the proposed Wall Street-West Avenue Redevelopment Area for the Norwalk Redevelopment Agency (NRA). Based on this assessment, RPA has determined that the area meets the criteria for blight designation provided in both state and federal statutes (Connecticut General Statute Chapter 130, Section 8-125(7) and CFR 5780.208(b)(1)) and therefore qualifies for designation as a redevelopment area.

The Wall Street-West Avenue Redevelopment Area is bounded by Cross Street and North Avenue to the north, the Norwalk River to the east, Route 1-95 to the south and the western boundary of the properties fronting on West Avenue and Belden Avenue to the west, and Norwalk Hospital (see Figure 1). The area contains a mix of land uses (see Figure 2). More than 1/3 of the study area is commercial; these uses are generally concentrated along the Wall Street and West Avenue corridors and in the northeast corner of the study area. Over the past several years there has been significant new residential development over ground floor retail space on both West and Belden Avenues. Industrial uses are generally concentrated along the waterfront. Institutional uses, including religious institutions, government buildings and community uses are found throughout the area. Open space is limited to a few small pockets within the neighborhood, including Freese Park at the corner of Main Street and Burnell Boulevard. Mathews Park at the southern boundary of the area is the most significant open space asset in the neighborhood.

There are 385 properties in the Wall Street-West Avenue Redevelopment Area. As shown on Table 1, of these properties, 205 parcels (or 53%) meet one or more state and federal criteria for blight determination, as discussed in detail in this report.

Table 1: Summary Of Blight Determination in Proposed Wall Street-West Avenue Redevelopment Area

<table>
<thead>
<tr>
<th>Total Properties</th>
<th>385</th>
</tr>
</thead>
<tbody>
<tr>
<td>Properties Meeting One or More Criteria</td>
<td>205</td>
</tr>
<tr>
<td>Percent of Properties Meeting Criteria</td>
<td>53%</td>
</tr>
<tr>
<td>Meets State Threshold (20%)</td>
<td>Yes</td>
</tr>
<tr>
<td>Meets Federal Threshold (25%)</td>
<td>Yes</td>
</tr>
</tbody>
</table>

*Source: Norwalk, CT GIS; RPA Analysis based on Norwalk Tax Assessor Data
Figure 2: Land Uses within Proposed Wall Street-West Avenue Redevelopment Area
Defining the Redevelopment Area Boundary

The Wall Street-West Avenue Redevelopment Area is a combination of two previous redevelopment areas as defined by the Norwalk Redevelopment Agency: the Wall Street Redevelopment Area and the West Avenue Redevelopment Area (see Figure 3). The combined Wall Street-West Avenue Redevelopment Area is bounded by Cross Street and North Avenue to the north, the Norwalk River to the east, Route 1-95 to the south and the western boundary of the properties fronting on West Avenue and Belden Avenue to the west, including Norwalk Hospital. This area includes the industrial uses along the waterfront and Mathews Park, which were previously not included in the existing Wall Street or West Avenue Redevelopment Areas. These properties have been added to the combined redevelopment area to allow the Redevelopment Agency to develop a holistic plan for the neighborhood that recognizes existing water-dependent and industrial uses and ensures that planning for the area accounts for the unique challenges associated with preserving such uses as redevelopment occurs within the broader neighborhood.

Blight Determination

Methodology

This blight determination analyzes individual properties within the study area, pursuant to Connecticut General Statute Chapter 130, Section 8-125(7) and CFR 5780.208(b)(1). Per Connecticut General Statutes, Chapter 130, Section 8-125(7), state criteria for blight designation includes:

- a. Defects that warrant clearance;
- b. Conditions from a defect that are not correctable by normal maintenance;
- c. Extensive minor defects that collectively have a negative effect on the surrounding area;
- d. Inadequate original construction or subsequent alterations;
- e. Inadequate or unsafe plumbing, heating or electrical facilities;
- f. Overcrowding or improper location of structures on land;
- g. Excessive density of dwelling units;
- h. Conversion of incompatible types of uses, such as conversion of a structure located near family dwelling units to rooming houses;
- i. Obsolete building types, such as large residences or other buildings which because of lack of use or maintenance have a blighting influence;
- j. Detrimental land uses or conditions, such as incompatible uses, structures in mixed use, or adverse influences from noise, smoke or fumes;
- k. Unsafe, congested, poorly designed or otherwise deficient streets;
- l. Inadequate public utilities or community facilities that contribute to unsatisfactory living conditions or economic decline; or
- m. Other equally significant building deficiencies or environmental deficiencies.

The State of Connecticut requires that 20% of properties within the designated boundary meet these criteria in order to qualify as a redevelopment area.

Per the U.S. Department of Housing and Urban Development (HUD) Code of Federal Regulations (CFR 5780.208(b)(1), federal criteria for blight designation includes:

A

1. Physical deterioration of buildings or improvements;
2. Abandonment of properties;
3. Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings;
4. Significant declines in property values or abnormally low property values relative to other areas in the community; or
5. Known or suspected environmental contamination.

- or -

B The public improvements throughout the area are in a general state of deterioration.

HUD requires that 25% of properties within the designated boundary meet these criteria in order to qualify as a redevelopment area.
Figure 3: Current Redevelopment Area Plan Boundaries: Wall Street-West Avenue
Analysis

RPA’s analysis of blight conditions in the Wall Street-West Avenue area focused on the State and Federal criteria outlined in Table 2.

Based on RPA’s analysis, 53% of the parcels within the study area meet one or more criteria to support designating the area as a redevelopment area (see Figure 4). This meets both state and federal thresholds for supporting the designation of a redevelopment area. Table 3 contains the results of these analyses. Detailed findings are described in the following sections. Several properties in the area meet more than one criterion, meaning that there are overlapping counts between the parcels detailed below. All totals reflect the number of parcels meeting any one criterion (i.e. parcels are not double or triple counted in the totals).

Table 2: Regulatory References for Blight Determination Criteria

<table>
<thead>
<tr>
<th>Regulatory Reference</th>
<th>Descriptions</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 130 Section 8-125(7)(B)</td>
<td>Conditions from a defect that are not correctable by normal maintenance</td>
<td>Pre-1978 construction (probable lead paint)</td>
</tr>
<tr>
<td></td>
<td>Brownfields</td>
<td></td>
</tr>
<tr>
<td>Chapter 130 Section 8-125(7)(M)</td>
<td>Other equally significant building deficiencies or environmental deficiencies</td>
<td>Flood Plain and potential for flood blight</td>
</tr>
<tr>
<td></td>
<td>Brownfields</td>
<td></td>
</tr>
<tr>
<td>CFR 570.208(b)(1)(ii)(a)(5)</td>
<td>Known or suspected environmental contamination</td>
<td>Pre-1978 construction (probable lead paint)</td>
</tr>
<tr>
<td></td>
<td>Brownfields</td>
<td></td>
</tr>
<tr>
<td>Chapter 130 Section 8-125(7)(J)</td>
<td>Detrimental land uses or conditions, such as incompatible uses</td>
<td>Uses incompatible with residential uses</td>
</tr>
<tr>
<td></td>
<td>Flood Plain and potential for flood blight</td>
<td></td>
</tr>
</tbody>
</table>

*Source: CGS 130, Section 8-125(7) and CFR 5780.208(b)

Table 3: Parcels Meeting Criteria for Blight Certification in Wall Street-West Avenue Redevelopment Area

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Number of Parcels*</th>
<th>Share of Total Parcels</th>
<th>Data Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brownfields and suspected brownfields</td>
<td>41</td>
<td>11%</td>
<td>NRA 2007 Brownfield Inventory (updated by RPA to reflect recent developments); Industrial Land Uses Classified by RPA based on Norwalk Tax Parcel Data</td>
</tr>
<tr>
<td>Suspected Lead Paint - Buildings Built Before 1978 (that have not been improved)</td>
<td>147</td>
<td>38%</td>
<td>Norwalk Tax Parcel Data</td>
</tr>
<tr>
<td>Parcels partially or fully within 100-year floodplain</td>
<td>44</td>
<td>11%</td>
<td>FEMA 100-year floodplain (Zone AE); Norwalk Tax Parcel Data</td>
</tr>
<tr>
<td>Total</td>
<td>205</td>
<td>53%</td>
<td></td>
</tr>
</tbody>
</table>

* Note: Several parcels meet more than one of these criteria, and are therefore counted more than once in this table. Parcels are only counted once in the total.

Note: While one of the criteria for blight determination established by state and federal statutes is a category for “incompatible uses,” RPA’s analysis described in the following section does not categorize existing uses within the neighborhood or along the waterfront as incompatible with one another.
Figure 4: Parcels Meeting One or More Criteria in Proposed Wall Street-West Avenue Redevelopment Area

- **Proposed Wall Street/West Ave Redevelopment Area Boundary**
- **Parcels in Redevelopment Area**
  - Orange: Meets one or more blight criteria (205 Properties)
  - Gray: Does not meet blight criteria (180 Properties)
Known or Suspected Environmental Contaminants

Assessing whether the area has environmental contaminants consists of two separate conditions that are unlikely to be addressed without significant building upgrades and remediation efforts. RPA’s analysis first counts the number of known and suspected brownfields within the redevelopment area, which are parcels likely to contain hazardous materials. The analysis then counts the number of buildings built before 1978 to determine sites that have a high potential for lead paint contamination, as described below.

Brownfields

A “brownfield” is a site that has a current or previous use that is assumed to have had negative environmental impacts on the land or building due to the nature of the use, including industrial uses, gas stations, auto repair facilities and similar uses. Brownfields are likely to contain numerous hazardous materials that can be harmful to residents or wildlife depending on the previous use of the parcel. RPA began this analysis by using Norwalk Redevelopment Agency’s 2007 Brownfield Inventory. Several parcels within this inventory were assumed to have been remediated due to substantial redevelopment on the sites. In addition to the Brownfield Inventory, RPA included sites with heavy industrial uses in this analysis as “suspected brownfields” due to the nature of their use (see Figure 5). Of the 385 parcels in the study area, 29 are brownfields and 12 are assumed brownfields due to the industrial uses contained there, totaling 11% of the total parcels within the study area.

Suspected Lead Paint

Due to lead’s demonstrated negative effects on child development, the United States banned the manufacturing of lead-based house paint in 1978. Prior to this, paints with lead were widely used throughout the country. Lead paint remediation is a costly undertaking that is unlikely to be performed with regular home and building maintenance. Using Norwalk’s Tax Assessor data, RPA analyzed buildings that were built before 1978, as these locations are assumed much more likely to contain lead-based paint than buildings built after 1978. RPA also analyzed the tax assessor data to determine properties constructed prior to 1978 that have undergone significant improvement, which are likely to have experienced lead abatement. For this analysis, RPA used the “effective date of construction” for buildings in the study area from the Tax Assessor’s office to ascertain which properties have seen significant improvements. If the effective year for a parcel was a later date than the construction year, the parcel is assumed to have undergone extensive improvements, including remediation of the potential for lead paint onsite.

Figure 6 shows the results of this analysis. 260 structures in the Wall Street-West Avenue Redevelopment Area were built before 1978 and 147 of those properties, or 57%, have not undergone significant improvements and are therefore at a higher risk for lead-based paint.
Figure 6: Parcels with Potential for Lead Paint Contamination in Proposed Redevelopment Area

- Proposed Wall Street/West Ave Redevelopment Area Boundary
- Potential Sites for Lead Paint in Redevelopment Area
  - Built Pre-1978 - without upgrades (147 Properties)
  - Built Pre-1978 - with upgrades (113 Properties)
  - Built After 1978 (30 Properties)
  - Insufficient Data (95 Properties)
Potential Flood Blight

The Wall Street-West Avenue neighborhood is a working industrial waterfront. However, the waterfront provides the potential for environmental contamination during flooding events, especially with heavy industrial uses in the floodplain. To assess the number of properties at risk of flooding, flood blight, and water-based environmental contamination, RPA analyzed the properties that are within the 100-year floodplain (see Figure 7). The Federal Emergency Management Agency (FEMA) defines Zone AE as an area with a 1-percent-annual-chance of a flood event with additional coastal risk from strong waves. For this analysis, RPA determined the number of parcels that are fully or partially within Zone AE. Parcels where only a small percentage of the lot is included in the zone were excluded. Based on this analysis, 44 parcels in the Wall Street-West Avenue Redevelopment Area are at risk of flooding and flood blight.

Figure 7: Parcels with Potential for Flood Blight in Proposed Wall Street-West Avenue Redevelopment Area