

05/01/2025

Stamford Zoning Board

Stamford Government Center
888 Washington Blvd.
7th Floor
Stamford, CT 06901

Subject: Sustainability Score for 35 Commerce Road, Stamford CT

Dear Members of the Stamford Zoning Board,

Our firm designed the new self-storage building proposed for 35 Commerce Road, Stamford, CT. As you know, this property is currently utilized for self-storage purposes. The new building incorporates several sustainable design strategies, including:

1. **Energy-efficient lighting:** The building interior will be equipped with high-efficiency LED lighting systems with motion sensors and timers to reduce unnecessary energy consumption. The proposed exterior lighting will be high-efficiency LED lighting systems with full-cut off fixtures to reduce light pollution. This approach not only lowers operational costs but also minimizes the building's environmental footprint.
2. **Thermally efficient building and low emitting materials:** White TPO roofing has been selected for its high Solar Reflectance Index (SRI), which reduces heat absorption into the building and helps mitigate urban heat island effects. Additionally, both interior and exterior materials are carefully chosen for their low emissions, minimizing the release of volatile organic compounds (VOCs) and other harmful pollutants. These choices contribute to improved indoor air quality, even in low-occupancy environments.
3. **Minimum required parking:** The project proposes only the minimum number of parking spaces required under zoning regulations, avoiding unnecessary impervious surface area. By limiting parking, the development reduces stormwater runoff and heat island effects. This approach preserves opportunities for additional landscaping along the site's perimeter which is incorporated within this proposed plan.
4. **Climate resilience:** The project benefits from the existing site's location, which is already situated outside of the projected 2085 sea level rise area, as well as beyond the 100-year and 500-year floodplains. As a result, the proposed building is naturally protected against future flooding risks, supporting the long-term sustainability of the development.

Notwithstanding these important strategies, the Sustainability Scorecard submitted in connection with the proposed development yields a score of 16 out of a possible 127 points, which results in a rating of "NR" (Not Rated). This score is not due to oversight or lack of commitment to

sustainability but appears to be a function of the nature of the existing and proposed use of the property, and the focus of the scorecard itself. The scorecard is a comprehensive tool designed primarily for evaluating residential, commercial, and mixed-use developments. However, it includes several categories that are inherently less applicable to low-occupancy buildings such as a Self-Storage building. These include:

- **Building Health, Urban Design, and Mobility:** These categories prioritize human comfort, access to daylight and views, walkable environments, and the promotion of alternative transportation. While important for residential or office spaces, these aspects are not entirely relevant for a facility designed for storage. Self-storage buildings are looked at as unoccupied with no full-time occupants. This proposed structure has no office space or employees. As such, providing convenient and free access to amenities such as fitness equipment would serve no purpose on the site. Similarly, self-storage customers typically utilize the premises for limited periods of time with varying frequencies.
- **Landscaping and Open Space:** While tree canopy targets, or habitat integration are constrained by the functional demands of the site, the applicant is committed to maintaining the existing tree count through a 1:1 tree replacement program. As part of this plan, 14 new trees will be planted as street trees along all three frontages of the site.
- **Energy Use and Resource Management:** While the building is designed with efficient systems and materials, the naturally low energy demand of a storage building and the fact that there are no regularly occupied spaces limit the potential for point accumulation in these areas. It should be noted that the proposed use will inherently use less energy than, residential, retail, or office alternatives.
- **Land Use:** This category prioritizes the redevelopment and reuse of existing buildings particularly for mixed-use purposes. While one point was awarded for the redevelopment of an existing site, the other items simply do not apply or are not relevant for a storage facility.
- **Water Use:** The absence of plumbing in the proposed self-storage building and the lack of an irrigation system make it difficult to score in this category. While the scorecard awards points for water saving measures, no points are awarded to buildings with no water use.

Despite these limitations, we have integrated sustainable design strategies wherever feasible.

Thank you for your time and thoughtful review.

Sincerely,
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