

January 25, 2023

Mr. Joseph Budrow, Zoning Enforcement Officer  
Planning & Zoning Commission  
Town of East Haven  
Town Hall  
250 Main Street  
East Haven, CT 06512

**Re: Comment Response Letter  
The Bluffs Multifamily Elderly Housing Application  
East Haven, Connecticut  
SLR #15956.00001**

Dear Mr. Budrow,

SLR International Corporation (SLR) is in receipt of the Planimetrics Report for the East Haven Planning & Zoning Commission, draft dated December 29, 2022 with comments from Glenn Chalder, AICP of Planimetrics regarding the above-referenced property. We offer the following responses to the site plan related comments numbered 9 through 16 contained therein.

#### **PARKING/PEDESTRIAN FACILITIES**

- C9. The "cover sheet" to the map set indicates that 537 parking spaces are required. However, Section 27.3.11 requires 1 space per 300 SF of support facilities (such as the clubhouse) and these spaces were not included in the calculation. The reference for parking requirements on the cover sheet (Section 28.7.3) is inaccurate and should refer to Section 27.3.11.
- R9. The parking calculation has been updated on the cover sheet to include the clubhouse. Architecture has also been provided for the clubhouse. Based on the 3,300 gross square feet of the clubhouse footprint at one space/400 square feet, the clubhouse requires nine parking spaces and 16 are provided. We have also updated the zoning section reference in the zoning data table on the cover sheet.**
- C10. In addition, the Commission should be aware that the distribution of parking spaces for the residential buildings is not proportional to the parking requirements:

Building		Ratio	Parking Required	Parking Provided	Surplus / Deficit
Building A – Assisted Living)		120 units @ 0.5 spaces/unit	60	127	<b>+67</b>
Building B (86 units)	Each with: <ul style="list-style-type: none"> <li>• 6 efficiencies</li> <li>• 50 1BR</li> <li>• 30 2BR</li> </ul>	Efficiency @ 1.5 = 9 1BR @ 1.5 = 75 2BR @ 2.5 = 75	159	139	<b>-20</b>
Building C (86 units)			159	132	<b>-27</b>
Building D (86 units)			159	147	<b>-12</b>
Clubhouse (4,300 SF?)		1/300 SF (?)	15	16	<b>+1</b>
TOTAL			<b>552</b>	561	<b>+9</b>

This will mean there is a strong likelihood that residents (in an age-restricted development) will be required to walk uphill / downhill in all weather conditions to access vehicles which parked in the uppermost parts of the site (to the rear of the assisted living building):

- Building B = 600' horizontal and 25' to 40' vertical.
- Building C = 800' horizontal and 10' to 25' vertical.
- Building B = 900' horizontal and 25'-to 30' vertical.

It does not appear that adequate and appropriate pedestrian facilities (sidewalks / stairs / handicap ramps/ railings, etc.) have been installed to address this situation. See Section 42.7.4.2. These pedestrian facilities should be constructed of concrete to avoid frost heave and deterioration (tripping hazards, etc.) over time. Handicapped accessibility in terms of ramps and grades should be considered. Lighting should also be adequate and appropriate.

The Commission may wish to request the applicant can provide real world examples of parking demand for a development of this type and explain why spaces are being provided in a remote location on the site.

**R10. While the zoning regulations require 159 spaces per building based on the Institute of Traffic Engineers recommendations (see attached), we estimate that the parking demand for mid-rise apartments such as these requires 126 spaces for the 86 unit buildings. That's a parking ratio of 1.47 spaces per unit. We believe that the parking as provided for each building at 126 spaces is adequate and that the overall parking proposed meets the requirements of the zoning regulations. While the numbers above are correct if evaluating each individual building per zoning, there are multiple buildings and uses on the site that can share parking when needed.**

If you breakdown the parking for each building by unit type there is at least one space for every unit, plus an additional space for each of the 30 two-bedroom units, plus ten additional spaces if any of the residents of the one bedroom or efficiencies have two cars. I suspect it's likely that any residents sharing a one-bedroom apartment with multiple cars will likely also share vehicles and will be able to park at least one car near their unit.

We agree that there is a larger concentration of parking at the assisted living building. Adjustments have been made to the revised plans to accommodate additional accessible spaces and sidewalks have been added for improved pedestrian circulation between all buildings. We believe the parking distributions as depicted will adequately serve each building and meets the overall total required by zoning. The additional parking at the Assisted Living Facility can also serve as overflow parking for the apartment buildings.

- C11. For an age-restricted housing development, the number of handicap-accessible spaces (8 provided) seems unresponsive to the likely demand for such spaces. It would seem that the number of handicapped spaces per residential building should be increased.
- R11. **Recent updates in the building code in Connecticut require 10% Type A accessible units for the apartments. Based on that requirement we are increasing the number of accessible parking spaces to nine per apartment building to match that unit count. For the assisted living building we propose to increase the number of accessible spaces from two to six.**
- C12. The applicant should provide additional detail on the number and size of parking spaces beneath the buildings since some do not appear to comply with the 9' x 20' requirement.
- R12. **See attached architectural sketches for garage dimensions, which show an 8' x 20' rectangle accommodated in all garage spaces.**
- C13. The applicant should be required to designate some parking spaces in front of the building for 15-minute occupancy to allow residents (regardless of mobility) to unload groceries or other items before moving their vehicle to an unrestricted parking space.
- R13. **One parking space for each apartment buildings has been designated with a 15-minute parking restriction to allow for drop off and loading.**
- C14. Parking lot landscaping does not appear to comply with Section 27.3.12 with regard to landscaped islands "every tenth [10<sup>th</sup>] space in a row of parking spaces.
- R14. **The parking is mainly oriented as single aisle double stacked rows. Where parking areas are larger with back-to-back parking spaces a full median island is provided with landscaping. There**

are no large expanses of paved parking proposed where intermediate islands would be meaningful to break up large parking lots. In this case, the internal islands and perimeter landscaping provide green space to buffer and shade parking areas. Adding small islands every ten spaces would create obstacles in removing snow and the islands will see significant damage from snowplows that will add cost to long term maintenance, while providing minimal landscape benefit. Placement of these islands would relocate parking spaces to the ends of the parking rows extending the rows to replace the spaces lost internally. This will require additional clearing of existing vegetation in some areas and lessen the benefits of adding the islands.

Adding the small interior islands every ten spaces would create about 16 islands accounting for 2,600 square feet of landscape space with 16 trees. Instead of adding the islands we have located proposed trees so that there is no section of parking more than 10 spaces without a shade tree. In comparison, the current plans conservatively provide over 50,000 square feet of landscape area in and around parking lots with approximately 180 shade and flowering trees throughout the project. The current design approach creates large landscape areas which will facilitate the long-term maintenance of the landscaping over time. Therefore, we believe the intent of the regulation is met by the abundant perimeter landscaping proposed.

- C15. Some of the parking areas are in very close proximity to steep slopes and guardrails may be necessary (note that bay-to-bay width could be reduced from 62' to 60' to facilitate this by allowing for 18' spaces (see Section 42.7.1) and 24' aisle):
- a. Both sides of parking area / access drive west of Building B
  - b. North of "Sperry Lane" roadway north of Building A
  - c. South of access drive to parking area south of Building C
  - d. Both sides of drive leading to Building D
- R15. **All 9' x 18' parking spaces proposed allows for vehicles to overhang the curb. Where the guiderail is located along the parking areas it is set back 2 to 3 feet from the face of curb to accommodate this overhang. The drive aisles for the double stacked parking areas remains at 26-feet, but we agree could be reduced to 24-feet to reduce the overall width from 62' to 60'.**
- a. Guiderail was added where appropriate on the garage (south) side of Building B. The length of stalls at the back to back parking in this area was adjusted to be 20-feet and the adjacent drive aisles were reduced to 24-feet from 26-feet, to accommodate the added length of striping.
  - b. Additional guide rail was added adjacent to the stormwater management area along Sperry Lane west of the assisted living building.
  - c. Guiderail was proposed in this location and was reviewed as part of the plan revisions.
  - d. Guiderail was added where appropriate along the driveway leading to Building D.

C16. The applicant should indicate where electric vehicle (EV) charging spaces will be provided on site. Public Act 22-25 requires that, in developments of 30 spaces or more built after January 1, 2023, at least ten percent (10%) of the parking spaces shall be EV charging spaces (57 EV spaces on this site).

Sec. 5. (NEW) (Effective October 1, 2022)

(a) *As used in this section, (1) "electric vehicle charging station" has the same meaning as provided in section 16-19f of the general statutes, (2) "level two electric vehicle charging station" means an electric vehicle charging station that supplies two hundred eight to two hundred forty volt alternating current, and (3) "direct current fast charging station" means an electric vehicle charging station that utilizes direct current electricity providing forty kilowatts or greater.*

(b) *On and after January 1, 2023, the Commissioner of Administrative Services shall require each new construction of a state facility, the total project costs of which exceed one hundred thousand dollars, to be installed with level two electric vehicle charging stations in at least twenty per cent of the designated parking spaces for cars or light duty trucks at such facility.*

(c) *On and after January 1, 2023, a municipality shall require each new construction of a commercial building or multiunit residential building with thirty or more designated parking spaces for cars or light duty trucks to include electric vehicle charging infrastructure that is capable of supporting level two electric vehicle charging stations or direct current fast charging stations in at least ten per cent of such parking spaces. A municipality may, through its legislative body, require any such commercial building or multiunit residential building to include such electric vehicle charging infrastructure in more than ten per cent of such parking spaces.*

**R16. A general note has been added to the plans regarding accommodations for EV charging stations as outlined in the current building code. The designated future EV spaces representing 10% of the overall parking count have also been located on the site layout plan. Once EV charger products are selected additional information will be provided as part of the building permit review process.**

#### OTHER

C27. The Commission should ask the applicant to provide information indicating that "notices to the water company and the Commissioner of Public Health" (**required under CGS Section 8-3i**) were filed.

**R27. Proof of filing has been submitted separately by the project attorney.**

C28. The applicant should provide site lighting details and a photometric plan.

**R28. A photometric plan and cut sheets for the proposed lighting are attached.**

C29. The Zoning Regulations require "(s)uitable, screened areas and facilities shall be provided for the adequate reduction, collection and disposal of refuse" and these do not appear to be provided for the residential buildings. Dumpster locations and details should be provided for all building (including the clubhouse), not just Building A (assisted living facility).

**R29. Dumpster locations with enclosures have been provided on the revised plans for each of the three apartment buildings.**

C30. The location of asphalt sidewalks versus concrete sidewalks should be clearly delineated. Concrete walks at least 5' in width are required per Section 27.3.14.

**R30. No asphalt sidewalks are proposed and the detail has been removed from the plans. All proposed walks shown on the plans will be concrete.**

C31. The location of asphalt sidewalks versus concrete sidewalks should be clearly delineated. Concrete curbs are required by various sections of the Zoning Regulations.

**R31. All sidewalks are proposed to be concrete. All curbs are proposed to be bituminous except where they are an integral part of the concrete sidewalks.**

Please feel free to contact me at (203) 271-1773 should you need any further information.

Sincerely,

**SLR International Corporation**



Darin L. Overton, PE  
Principal Civil Engineer

Enclosures

CC: Glenn Chalder, AICP- Planimetrics

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