



January 25, 2023

Mr. Joe 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
East Haven, Connecticut
SLR #15956.00001**

Dear Mr. Budrow,

SLR International Corporation (SLR) is in receipt of the Supplemental Staff Report—Site Plan Review from you with comments from you dated January 2, 2023, regarding the above-referenced property. We offer the following responses to the comments contained therein.

- C1. PAGE 1 – Title Page with Zoning Date and General Notes and Erosion Control Notes:
-The applicant has applied for a CTDEEP General Permit for Stormwater discharge. The Town must acquire a copy of the approved permit prior to the development submitting a zoning permit application.
- R1. A CTDEEP Construction Storm Water General Permit (SWGP) is required for the project but is not being filed at this time. It will be prepared prior to construction and a copy can be provided to the town at that time.**
- C2. PAGE 3 – IN “Index and Overall Site Plan”
-There are 9 h/c parking spaces shown. The proposal is for a “Multifamily Elderly Housing/Assisted Living Facility”. The development should have more than 9 handicapped spaces.
- R2. 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.**
- C3. PAGE 4 – LA-1 “Layout and Landscaping”
-I feel that the Layout Notes should add that there will be an annual inspection of the pavement markings and parking space lines. Should this be the Town staff? Or the site manager?

-A planting schedule (timeline) should be submitted. Per the Landscaping Plan, there should be a Performance Bond paid to the Town when certain plantings can't be installed prior to a Certificate of Occupancy. The plant list is shown, thus giving the Town Engineer the opportunity to calculate the Bond requirements.

-The plans show a number retaining walls being designed by a licensed engineer. Perhaps the site engineer can give an estimate as to how high these walls would be.

R3. A note has been added regarding the annual inspection of pavement markings by the property manager.

All landscaping has a 1-year guarantee beginning on the date of installation, which can range from March 1 to October 30. If any landscaping has not been installed within that window, at the time of a Certificate of Occupancy (CO), then the performance bond described above should be held to cover those costs, if necessary.

Additional spot elevations have been added at the top and bottom of proposed retaining walls to better represent the proposed height.

C4. PAGE 5 – LA-2 “Layout and Landscaping”

-There is a single dumpster location for the entire development. It is near the Assisted-Living Facility. This location is probably too small for the ALF itself. 120 dwelling units AND a kitchen and dining facilities are proposed inside. The applicant should describe the plan for the residents in the apartment buildings to discard their refuse.

-The “footbridge to be repaired.” The Town Engineer shall determine if the extent of the repair is a regulated activity that requires an approved wetland permit.

R4. The compactor and dumpster facilities proposed at the assisted living building are adequate for the proposed use. A dumpster enclosure location has been added to each of the apartment buildings for convenience of trash disposal at each building.

C5. PAGE 8 – GU-1 “Grading and Utilities”

-Along the west side, at the beginning of the entry road, there is an underground retention system. This system needs protection from vehicles. Perhaps bollards should be required along its perimeter.

-The Stormwater Maintenance Program Notes mention forebays. I don't see any forebays on the plans. (Perhaps forebays are during-construction drainage techniques).

R5. The underground detention system will be specified to have HS-20 traffic loading, so no bollards or other protection is needed.

The maintenance schedule includes mention of forebays if they are proposed, but none are proposed for this project. Where appropriate hydrodynamic separators are proposed prior to discharge to the stormwater basins. These structures generally take the place of the forebay.

C6. PAGE 9 – GU-2 “Grading and Utilities”
-Parking areas should require more guide rails due to dropping slopes just beyond the edge of the parking areas.

R6. We have added additional guiderail on the plans at locations recommended by town staff.

C7. PAGE 13 – SE-2 “Sediment and Erosion Control Plan”
-Symbology states “Stacked” haybales. Probably should be “staked.”

R7. The proper term should be “staked haybales”, which has been corrected on the revised plans.

Additional Comments:

C8. As shown on the submitted plans, some units do not have the square footage labeled. I feel the floor plan sizes, as proposed, will work out to be compliant with Section 27.

R8. The architectural plans have been updated to label the square footage of each type of unit. The unit sizes are compliant with the regulations.

The Parking Deficits:

C9. The Zoning Data on Front Page of the Site Plan states that 537 parking spaces are required. This is correct. The proposal is for 561 total spaces on site. (My math shows 562).

R9. There is no parking deficit as the total parking spaces proposed for the project is consistent with the zoning regulations. The parking counts have been updated on the revised plans.

C10. The Assisted Living Facility requires 60 spaces.
Each apartment building requires 159 spaces.

C11. The site development plan shows serious parking deficits around the apartment buildings. This is a problem as residents and visitors are being made to walk long distances to their homes. The land is not flat.

Building A – 60 spaces required. 127 spaces proposed. **+67 spaces**

Building B – 159 spaces required. 139 spaces proposed. **-20 spaces**

Building C – 159 spaces required. 132 spaces proposed. **-27 spaces**

Building D – 159 spaces required. 147 spaces proposed. **-12 spaces**

- C12. The parking surplus at the Assisted Living Facility minus the three parking deficits at the apartment buildings: $67-26-27-12 = +8$ parking spaces. The clubhouse is an accessory use that requires 15 parking spaces. The applicant provides 16. **+1**
- C13. I don't see an explanation by the applicant that is acceptable for the Commission. Each apartment building needs the 159 parking spaces adjacent to it.

R10-13. 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.

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.

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

15956.00001.j2523.ltr.docx