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February 29, 2024

Michael Conklin
Director of Environmental Affairs
Town of Wilton
238 Danbury Road
Wilton, CT 06897
Sent via email: mike.conklin@wiltonct.org

**RE: Wilton Inland Wetlands and Watercourses Agency Review
Application for a Significant Regulated Activity
Application #2904(S) AMS Acquisitions, LLC
131 Danbury Road, Wilton, CT**

Dear Mr. Conklin:

Cardinal Engineering Associates, Inc. (CEA) has conducted a review of the following revised application documents pertaining to the proposed site improvements (Multi-Family Development) at 131 Danbury Road in the Town of Wilton. The revised documents were prepared following Cardinal's initial review letter that was prepared on January 19, 2024.

Reviewed application documents include:

- Response cover letter. Agent: Craig Flaherty, Redniss & Mead, dated February 16, 2024.
- Applicant Responses to Cardinal's Review Comments dated February 13, 2024.
- DPW Response Letter, prepared by SLR, dated February 14, 2024.
- Site Plans: Proposed Multi-Family Development, 131 Danbury Road, Wilton, Connecticut, October 23, 2023 IWC Submission, Prepared by SLR. Revised February 13, 2024.
- Drainage Report: Proposed Multifamily Development, 131 Danbury Road, Wilton, Connecticut, dated October 23, 2023, prepared by SLR. Revised February 13, 2024.
- Engineering Report: Floodplain Analysis, prepared by SLR, dated November 27, 2023 and revised February 14, 2024.

Based on a review of the above application documents, we offer the following comments for your consideration. Along with the previous Cardinal prepared reports, this report was prepared to provide comments during the Inland Wetlands and Watercourses Agency application process. However, some of the comments may not be applicable to the Inland Wetlands Application, but may be applicable to consistency with the Connecticut Stormwater Quality Manual, CTDOT Drainage Manual, Connecticut Guidelines for Erosion and Sediment Control, NPDES/MS4 standards, State Statutes, and current civil engineering design practices/standards.

Review comments noted as "Response Noted" unless additional comments were added do not require a response from the applicant or their consultant. Additional or new comments are in bold. Only the comments still deemed open as of the January 19, 2024 report are included in this document.

CRITICAL COMMENTS

Based on Cardinal's initial review and the review of the revised and additional information recently submitted, there are a number of critical issues that require attention by the applicant and their consultant.

1. The impact of flooding on the property and proposed development of the site has not been adequately addressed. A significant area of the property is not only subject to flooding under the 100-year storm event, but to flooding during smaller duration storms.
 - a. For instance, the entire parking area beneath the building is subject to flooding. The only entrance / exit to the parking is at the low end of the garage. During storm events, this area may be subject to 2 feet of water, making it virtually impossible for vehicles to exit the garage until the waters have subsided.
 - b. The FEMA limits of the 100-year flood and 500-year flood are improperly shown on the plans and should be modified to reflect the elevations as provided in the FEMA Flood Insurance Study and the consultant's HEC-RAS analysis.

R.1: The plans have been modified to include an exit drive on the south-eastern corner of the garage above the flood elevation. Additionally, the grading of the garage has been revised so 119 spaces are now located above the flood elevation. Additionally, 28 spaces are located in an area with less than 6 inches of water for the 100-year flood. The FEMA limits shown on the plans are the regulatory line shown on FEMA FIRM panel 0391. A "non-regulatory" elevation based line has been added to the plans as well. A revised floodplain earthwork analysis has been prepared based on this elevation-based line. The proposed project grading results in no net increase in fill in the flood plain.

CC-R.1: Response Noted

2. The stormwater analysis of the Norwalk River and its impact on the site requires further revision. Additional documentation needs to be included of the HEC-RAS analysis to confirm that modeling work is sufficient (see Comment CC-RPT-2)

R.2: Two additional cross sections have been analyzed. Results of the hydraulic modeling show the project will not increase the base flood elevation in the Norwalk River. A revised Floodplain Analysis has been submitted.

CC-R.2: Response Noted

3. The sizing of the stormwater treatment measures (hydrodynamic swirl chambers, etc.) should be designed for the total flow discharging into each measure. The storm drainage layout combines treated stormwater with untreated stormwater. Either the treated and "clean" stormwater should be kept separate from the untreated stormwater, or the size of the swirl chambers should be designed to treat the entire volume of runoff to that chamber.

R.3: The final hydrodynamic separator (MH2/Cascade CS-5) has been resized based on the entire volume of runoff discharging to the structure.

CC-R.3: Response Noted

4. **The direct impact of the proposed project on the inland wetlands associated with the Norwalk River requires further consideration. The construction of the 36" dia. RCP outlet pipe, endwall and riprap splash pad are proposed with minimal protection of the river during construction. Conversely, the application does not provide any measures to protect the work from the river. As proposed, the splash pad requires 12" of excavation immediately adjacent to the river and the construction of the endwall requires 2 feet of excavation below the river. The applicant must show how this area will be protected not only during storm events, but during normal flow conditions.**

Please see the comments below that provide more detailed comments and concerns.

Town of Wilton Inland Wetlands Commission Application

CC-APP-1: Response Noted.

Engineering Reports

Drainage Report – Proposed Multifamily Development (prepared by SLR International Corporation, dated 10/23/23)

RPT-1: As requested by the Town Engineering Department, additional information is needed on the development in the floodplain. The information should include calculations and a discussion to show there is no net fill within the floodplain of the Norwalk River.

R. RPT-1: Additional information on the floodplain and earthwork has been added to the set. The project does not result in an increase in fill in the floodplain.

CC-RPT-1: Cardinal reviewed the additional drawings (including sheets EW and FP) that were provided showing proposed earthwork including the earthwork in the floodplain (specifically sheet 19 Floodplain Earthwork (FP) and sheet 20 Proposed Site Earthwork (EW)). As relates to earthwork calcs, the wetland application listed 237 cy of material excavated in the URA and 745 cy deposited in the URA. Based on the area (approximately 35,000 sf) and the supplied drawings, both values seem to be higher (greater than 1,000 cy), but additional information seems needed to confirm the values in the application. Additional information should include cut/fill amounts from western boundary to walking path along river, cut/fill within 10 foot parking setbacks on northern and southern borders (within floodplain).

R. RPT-1: All earthwork sheets have been revised based on updated grading. An upland review area earthwork has been added to the set. Cut/fill tick marks are provided on these sheets to show a grid of cut/fill values across the area for support to the values calculated for total cut, total fill, and net total.

CC-RPT-1: The elevation for the stairway/elevator areas (approximately 590 sf) in the ground floor of the parking garage are being assigned the same elevation as adjacent open areas. These areas are partially filled areas and Sheet 19 Interpolated Floodplain Earthwork should indicate this. Sheet 19 should also include any fill associated with the retaining wall (approximately 70 LF) on the north side and retaining wall on the southern side (approximately 100 LF). See CC-GR-12 related to wall grading.

RPT-2: Wilton Zoning regulations require certification by PE that encroachments in the floodway do not result in any increase in base flood elevations (0.00 ft) for the 100-year flood. Certification by a professional engineer with supporting hydrologic and hydraulic info (e.g. Hecras modeling) is needed.

R. RPT-2: See Engineering Report – Floodplain Analysis prepared by SLR International Corporation dated November 27, 2023.

CC-RPT-2: The floodplain analysis was prepared prior to latest revision of the plans so it should be updated as necessary with any grading and layout changes from the last revision. Under Section 2.0 Modeling, the conversion factor for the datum is provided. The conversion factor should be shown to two decimal places.

The floodplain analysis should include additional information. Due to the size of the site (a 385 feet border with

the Norwalk River), two additional RAS cross sections appear needed to completely depict both existing and proposed conditions (on the site, in the river, and west of the river). Based on Figure 2, it appears only one RAS section (27.5) was used to evaluate the site for the base flood conditions. This cross section doesn't take in account the areas of the site that don't contain the proposed building. Cross section 27.5 for the proposed conditions (in Appendix B) appears to show the building starting at 120 feet from the center of the river (Station 880) whereas the grading plan shows the building closer to the river (100 feet). This cross section also shows flow in the area left (or east) of station 560 which should be modeled ineffective or obstructed since it is at elevation of 154 feet.

The distance downstream/upstream from adjacent cross sections should be provided along with distances from the FEMA cross sections (N and O). In addition, the floodplain report should address the duplicate effective model for 10-year storm to support the values used for 10-year existing conditions. The 10-year existing condition appears low compared to the FIS profile which shows a 10 year storm elevation of ±144.9 (See comment GR-4).

The plans call for numerous boulders (30 or so) along the river including some in the floodway. These may need to be taken into account in the RAS model and be accounted for in the cut & fill calculations if they are sufficiently large. SD-3 provides a boulder detail, but doesn't provide a size.

R. RPT-2: The conversion factor that was used in the hydraulic analysis and provided in the Engineering Report was taken directly from the most recent Flood Insurance Study (FIS) for Fairfield County revised to October 16, 2003, see Section 3.5 – Vertical Datum on Page 110-111 in Volume 1 of 6. The conversion factor provided in the FIS is to a tenth of a foot and therefore was used to convert elevation data as needed in the hydraulic analysis.

The hydraulic analysis was revised to include two additional cross sections up- and downstream of the proposed building location. All cross sectional data used to develop the geometry through the project site was checked and updated as needed to reflect the proposed changes, including grade changes and obstructions that will change due to the removal of the existing building and construction of the new building.

CC-RPT-2: The items below were not addressed in the revised Floodplain Report. The outstanding items are:

- **Distance downstream/upstream from adjacent cross sections should be provided along with distances to FEMA cross sections**
- **The boulder detail was removed from SD-3, but both the site plan and landscape plan still show bouldering along the river.**

Additional items noted are below:

- **Tables 2-2 and 2-3 both show duplicate effective vs corrected effective data. It appears that Table 2-2 should be deleted and the name of Table 2-3 revised (it says corrective effective vs. proposed conditions).**
- **The RAS cross sections (existing & proposed) should be provided for the three cross sections at the site. Cross sections were omitted from the report including cross section 27.5 which shows the proposed building.**

RPT-3: Related to hydraulic documentation, the tailwater elevation used (138.8 feet) for the 18-inch HDPE pipe discharging to the Norwalk River should be based on the hydraulic modeling for Norwalk River and a joint probability analysis.

R. RPT-3: As a conservative approach, the pipe calculations were completed using the tailwater elevation at the crown of the discharge pipe, the most restrictive condition to the flow of the discharge pipe.

CC-RPT-3: The 2-year water surface elevation of the Norwalk River at the location of the outlet should be determined. If that value is higher than the crown of the pipe (139.3 feet), then that elevation should be used for the 25 year pipe calculations.

R. RPT-3: A hydrologic analysis was conducted to estimate the peak discharge rate in the Norwalk River during a 2-year flood. The peak discharge rate was estimated using the Bulletin 17B/C capabilities built into the US Army Corps of Engineers HEC-SSP application. The methodology utilizes statistical analysis of annual peak flow data collected at USGS stream gauges. For this analysis, the Norwalk River at South Wilton gauge (USGS Gauge 01209700) was used to estimate hydrology. This gauge has a 67 year record and is located at Kent Road, which coincides with a flow change location with a flow change location that was used in the FEMA effective model and is the basis of the floodplain analysis. The hydrology analysis estimates a peak discharge rate of 1,030 cfs in the Norwalk River within the study reach, and was used to estimate the flood elevation at the project site. The hydraulic modeling indicates that the 2-year flood elevation ranges from 140.14 to 140.09 along the river at the project site. The hydraulic modeling results for the 2-year flood in the Norwalk River were used as the tailwater conditions in the storm drainage design calculations. See the revised Engineering Report – Floodplain Analysis and revised Drainage Report for more information.

CC-RPT-3: Noted.

RPT-9: The 100-year peak flow runoff for PR-11: Building Roof is shown as 15.7 cfs with a volume of approximately 50,000 cf, but after routing through reach R1: Roof Leader (8 inch round pipe) the outflow is only 1.4 cfs. The underground detention system S-2 only provides 5,500 cubic feet of storage so there doesn't appear to be sufficient storage to warrant such a large decrease in the peak flow in this area.

R. RPT-9: System S-2 has been sized to provide sufficient storage for the design 25- year storm event. Storage for the 100-year storm is not a requirement. For larger storms, it is expected that water from the roof will discharge through overflow scuppers and be collected by the onsite inlet structures.

CC-RPT-9: The summary on Table 1 in the report states that there are no increases in peak rates of runoff for the 2-year through 100-year storms which is supported by runoff results provided in the report on pages 5 through 7. Roof drainage significantly impacts the design of the site stormwater system so a complete drainage plan for the roof and its connection to the underground detention units should be provided.

During the wetlands meeting on December 14, there was a mention of a green roof. If this is part of the design and affects the runoff, it should be included in the report.

CC-RPT-9: The previous comment was not addressed. The February 13, 2024 plan set still only shows one roof leader from the main building (discharging to south side). Several roof leaders would be expected on several sides of the building. The roof drainage design appears incomplete. See CC-UT-1.

Engineering Plans

We recommend including a site demolition plan or site preparation plan that outlines material to be removed (including pavement and concrete) and what materials are to remain. This plan should address any removal / capping / abandonment of existing site utilities including drainage. The site demolition plan should call out the trees to be removed also.

R. Almost everything on the site is to be removed. A site demolition plan or site preparation plan will be prepared as part of the detailed building permit submission. All trees within the project disturbance area will be removed except those along the river, which have been called out to remain on Sheet LA.

CC-1: A site demolition / preparation plan should be submitted as part of this application in order for the

commission to see the extent of the work and to provide direction to the contractor.

CC-1: Not addressed. No response offered.

Sheet 1 Title Sheet

T-2: Note 10. The CTDOT Standard Specifications for Roads, Bridges, Facilities and Incidental Construction, Form 818 (2002) is scheduled to be replaced with Form 819 on January 2024. All work shall conform to the revised edition.

R. T-2: Note 10 has been revised.

CC-T-2: “Facilities” omitted.

R. CC-T-2: Note 10 has been revised.

CC-T-2: Response Noted.

Sheet 2 Notes and Legend

NL-4: Stormwater Maintenance Program – The hydrodynamic separator is not located prior to the underground galleries.

R. NL-4: The stormwater maintenance program has been revised.

CC. NL-4: Response Noted. The hydrodynamic separator shall be sized to have the capacity for the entire discharge flow. It is suggested that the separator be installed off-line to treat the stormwater from the areas that are not pre-treated in the isolator rows of the subsurface storage systems.

R. CC-NL-4: Hydrodynamic separators have been sized based on the total volume of water discharging to the structure and per the manufacturer specifications.

CC. NL-4: Response Noted.

NL-5: Construction Sequence – The application package contained a sequence or staging plan prepared by AMS Construction Management LLC for the site. The construction duration was listed as 30 months. This sequence and information should be coordinated with the sequence provided on the Notes and Legend plan. Expected temporary parking and construction office locations should be designated.

R. NL-5: The plans have been revised to reference the AMS construction narrative. The construction management plan will be expanded with the building permit submission.

CC. NL-5: Please provide the updated AMS construction narrative as part of this application.

NL-6: Construction Sequence – The sequencing should include removal of the existing building and associated utility removals/disconnects prior to filling. Utility pole(s) along the roadway may need relocation. Mention of town staff should include Town Director of Environmental Affairs.

R. NL-6: The submitted construction management plan will be expanded for the building permit submission and with input from the construction manager.

CC. NL-6: Please provide the updated AMS construction narrative as part of this application.

NL-7: Construction Sequence – See erosion control note SE-1-11 about leaving pavement buffer along river as long as possible for stabilization.

R. NL-7: Reference has been made to the AMS construction narrative.

CC. NL-7: Please provide the updated AMS construction narrative as part of this application.

CC. NL-5-7: The AMS construction management plan was submitted separately. Please refer to Cardinal's letter dated 2/8/2024 for comments.

Sheet 3 Existing Conditions

EX-1: Limits of the 100-year flood. Per FEMA mapping (FIRM 2010) and the Flood Insurance Study (2013), the site falls between cross section N (Elev. 141.2) and cross section O (Elev. 153.1). The limit of the 100-year flood (Zone AE) at the site is at approximate elevation 146.3 at the south end of the property and ± 146.6 at the northern side. Revise the plans accordingly. Revise earthwork calculations for cuts and fills within the area of the 100-year flood and impacts on flood storage capacity of the site.

R. EX-1: As per FEMA requirements, the 100-year flood line is to be shown as graphically represented on the FEMA maps and not by interpolating elevations. Earthwork calculations were conducted based on a floodplain elevation of ± 146.5 as the most conservative approach.

CC. EX-1: This is incorrect. Per the FEMA National Flood Insurance Program (NFIP) Floodplain Management Requirements, if the 100-year Base Flood Elevation (BFE) is based on cross sections and the flood zone is an AE Zone, then the flood limits shall be shown on the plan based on the elevations, not the lines shown on the FEMA FIRM map. Revise the plans to depict the 100-year flood limits and 500-year flood limits per the established BFE for the site.

R. CC-EX-1: FEMA provides the effective floodplain boundary based on their FIRM panel mapping. The LOMR process is required in order to change the FEMA floodplain delineation. The FEMA line is considered the regulatory line, and a callout has been added to sheet EX. An additional line based on Base Flood Elevation has been added to sheet EX and called out as the non-regulatory boundary.

CC. EX-1: We disagree. As stated above, the FEMA National Flood Insurance Program (NFIP) Floodplain Management Requirements states if the 100-year Base Flood Elevation (BFE) is based on cross sections, the flood limits shall be shown on the plan based on the elevations. With that said, the limits of the 100-year flood based on the elevations of the site was included on the plan satisfying the comment above.

Sheet 4 Site Vicinity Plan

SP-1: Addresses of adjacent properties would be helpful. It might be a plan that could be helpful in discussions with CT DOT.

R. SP-1: The project's zoning application includes a list of adjacent property owners. This information can be provided if requested by CTDOT.

CC. SP-1: Noted.

Sheet 5 Site Plan-Layout

LA-4: ADA parking spots should be dimensioned.

R. LA-4: ADA parking spots have been dimensioned.

CC. LA-4: Space at northeast corner width is not dimensioned. Scales 8 ft. If van space, provide 8' striping on right side of space to accommodate a lift. If standard accessible space, space width shall be 10 ft. Second space is labeled a van space. Striping on right side of space should be 8 feet in width to allow for a lift.

CC. LA-4: Per CT Building Code, shared striped aisles between van and standard spaces shall be 96". Only 60" striped aisle provided.

LA-11: Site lighting does not appear to be adequate (Insufficient pole mounted lights or wall mounted lighting). A photometric plan should be prepared clearly showing all fixtures and illuminance with closeness of the property lines and river area taken into consideration.

R. LA-11: Photometric plan is included in the set.

CC. LA-11: Photometric plan doesn't show the revised layout.

CC. LA-11: Revised photometric plan not provided.

LA-23: Appears inadequate space available at the southern of 2 truck spaces for turning in and out of space.

R. LA-23: Turning movements for truck spaces have been provided on Sheet VH-2.

CC. LA-23: Turning movements require trucks to be angled across both truck spaces. If one space is occupied, how is access to be provided for the second space? SU-30 vehicles extend into the main travel aisle. Previous response indicates that no large trucks are expected. It is suggested that it be signed that no trucks are allowed to park within the garage (pick-ups and vans only).

CC. LA-23: Not addressed. No response offered.

LA-37: ADA ramps along Danbury Road – Identify ramp type per CTDOT Guide Sheets. Ramps may require curbing due to close proximity to roadway curbing.

R. LA-37: ADA drop ramps along Danbury Road are CTDOT Type 4a with a detectable warning pad. Notes have been added to the plans.

CC. LA-37: Ramp Type 4a and Type 4e are called out. Ramps may require curb along ramp or curb along road / drive may need to be tapered. Provide call-out for curbs.

CC. LA-37: Ramp at south side of entrance not identified.

LA-40: Provide documentation for right to construct proposed work on property to the north (pea stone walk, gate, grading, etc.). Plan calls for gate, but a fence is not observed on the plans.

CC. LA-40: Not addressed. No response offered.

LA-41: Install sidewalk within Danbury Road ROW.

LA-42: Note where standard concrete curb ends and transitions to "Cape Cod" mountable curb.

LA-43: Change linetypes at edge of drive to differentiate between curb types, and edge of drive without curb.

Sheet 6 Site Plan-Landscaping

LS-1: It appears that the plan is to keep the large sycamore on the southwest corner of the site. Installation of the proposed drainage in this location would appear to undermine its root system.

R. LS-1: The large sycamore tree has been noted as to be removed on the revised plans.

CC. LS-1: Removal of the sycamore does not appear to be noted on any of the plan sheets. Provide a site demolition or preparation plan noting trees and other vegetation to be removed.

CC. LS-1: Removal of the existing trees, etc. not noted on the plans.

LS-3: The significant amount of plantings may require an irrigation system and plan.

R. LS-3: While the design intent is to propose plant species that are native and sustainable, it may be necessary to provide drip irrigation within the planting beds and spray heads for the rear lawn access drive for use during plant establishment and periods of drought.

CC. LS-3: If drip irrigation is proposed, it should be indicated on the plans.

CC. LS-3: No response provided. Irrigation not noted on plans.

LS-7: Tufted Hair Grass – concern regarding sightlines at drive intersections. May obstruct views. Also, concern over taller shrubs that may obstruct visibility for safety concerns in parking areas.

R. LS-7: Tufted Hair Grass will not grow above 3' in height and are planted far enough off the entry/exit so it will not impact sight lines. The Lowbush Blueberry plants in the parking island have a maximum growth height of 3'-0".

CC. LS-7: Plantings of 36" may interfere with sight lines within the parking. / drives. This is especially a concern where the drive that runs southerly along the front of the building meets the east / west drive at the south end of the site. The grade of the east / west drive drops off considerable to the west, and a 3' planting screen of grasses may interfere with a southbound vehicle from seeing on-coming cars from the west.

CC. LS-7: No response provided.

LS-8: The landscaped areas in the front of the proposed building may not benefit from the amount of proposed filling. Some of these areas may benefit from being depressed.

R. LS-4: Comment noted.

CC. LS-4: Are any modifications to the plans to be implemented?

CC. LS-4: No response provided

Sheet 7 Site Plan-Grading

GR-4: The FEMA FIS profile of the Nowalk River indicates that the 10-year storm flood elevation is ±144.9. The western portion of the site, including the infiltration areas and the storm drainage detention systems will be under water. How will they perform in the flooded condition? Approximately 60% of the vehicles parked in the garage will be within the area of flood and the cars parked in the eastern portion of the garage may become trapped.

R. GR-4: The infiltration basins and chambers are primarily designed for water quality as the project results in a decrease in impervious cover. Water quality features are sized for the frequent, small storms and not the larger storm events. These facilities will be temporarily flooded but will drain as the storm flow recedes. The storm water system will be inspected and cleaned (if necessary) after each flood event. The storm system will continue

to function as designed after the flood event.

CC. GR-4: Impact of the 10-year storm on the parking was not addressed.

R. CC-GR-4: The proposed 10 year flood elevation of 144.9 has been delineated on the proposed grading plan.

CC. GR-4: Response Noted.

GR-6: Provide top of wall and bottom of wall elevations for all site walls, including at each step / change in elevation. Suggest providing elevation view for each wall. Walls not shown to correct width (24") as noted on the Stone Veneer Masonry Block Wall detail

R. GR-6: Top of wall and bottom of wall elevations for all site walls have been noted, including each change in elevation.

CC. GR-6: Provide TW elevations of Wall #2 & Wall #3 at building. Contour 154 meets the walls at the building but last TW el. = 151.5 @ #2 and 153.5 @ #3.

CC. GR-6: Not addressed. No response offered.

GR-8: Construction of Wall #4 will trap water from adjacent site that in the existing condition flows southeasterly across the site. In the proposed condition it will flow westerly between Wall #4 and the existing wall on the adjacent site and discharge onto the adjacent site. Suggest adding a yard drain at the western end of the existing wall and connect to CCB-28.

R. GR-8: All water that does not infiltrate in the grass area will continue to flow west towards the Norwalk River.

CC. GR-8: BW elevation (147.5) indicates a fairly flat grade on the north side of the wall and is lower than the existing grade in some locations. Provide proposed grading along north side of Wall #4 to show how runoff will be directed.

CC. GR-8: Not addressed. No response offered.

GR-9: Wall #4 height is greater than 6 feet at its highest point. Review typical wall section. Concrete cantilever retaining wall or geotextiles may be required for walls with greater heights. Suggest fence along top of wall to prevent falling, etc.

R. GR-9: A fence has been added to the top of the retaining wall on Sheet LA and a detail added to Sheet SD-7. Final wall design will occur with building permit submission and wall structural design will likely vary depending on the constraints.

CC. GR-9: Proposed geotextile may conflict with utility pad foundations. Typical length of geotextile from wall is 10 feet. Provide detail for fence installation on wall. Typically, modular block walls do not allow for installation of fence directly on wall.

CC. GR-9: Not addressed. No response offered.

GR-11: Provide greater detail of grading of street sidewalk, particularly in relation to front wildflower meadow. Will wildflower meadow overtop and drain onto street? At the south end of the "meadow, the sidewalk drains to the street; in the middle, it drains to the "meadow"; at the north end the sidewalk drains to street. Suggest consistency in draining in one direction or the other. Suggest providing a greater buffer between the "meadow" and the streetline. See note UT-2.

R. GR-11: Additional spot grades have been added to the plans.

CC. GR-11: Additional spot grades between “detention area” and street may be required to make sure runoff has adequate pitch. Proposed sidewalk has been relocated to inside the property. Provide sidewalk easement to the Town of Wilton.

CC. GR-11: Not addressed. No response offered.

GR-12: Show grading south of Retaining Wall #1 to property line.

R. GR-12: Grading south of Retaining Wall #1 to property line has been added to the plan.

CC. GR-12: Review grading in this location. Contours are incorrect between proposed wall and existing stone wall. Low area appears to be created. 147 contour appears incorrect (there are 2).

CC. GR-12: Not addressed. No response offered.

GR-15: Show transformers and switch gear on grading plan. Provide top of slab elevations.

R. GR-15: Transformers and switch gears are now shown on Sheet ‘GR’. Spot grades have been added to the transformer slab.

CC. GR-15: Some spot grades appear to be incorrect in relation to top of curb elevations (assuming 6”) and TW elevations. Also, are generator pad and transformer pads flush with adjacent concrete pad or are they elevated? Typically, transformer pads are set level, but proposed adjacent concrete pad is sloped.

CC. GR-15: Not addressed. No response offered.

GR-16: Show generator pad and provide top of slab elevation.

R. GR-16: Generator pad is now shown on Sheet ‘GR’. Spot grades have been added to the generator slab.

CC. GR-16: Is the generator pad flush with adjacent concrete pad or are they elevated? Typically, transformer pads are set level, but proposed adjacent concrete pad is sloped. Provide generator pad detail. Typically, haunch depth is to frost (3’-6”).

CC. GR-16: Not addressed. No response offered.

GR-17: Grading at storm drainage outlet (endwall) is not shown correctly. Proposed contours are too close together. Either extend the endwall or use wingwall type endwall.

R. GR-17: Grading at storm drainage outlet has been revised.

CC. GR-17: Grading is incorrect. 141 contour between 140 contour and 141.20 spot grade required.

R. CC-GR-17: Grading has been revised at the storm drainage outlet.

CC. GR-17: Response Noted.

GR-19: Proposed 143 contour missing at northwest corner of the site.

R. CC-GR-19: Grading has been revised in the northwest corner of the site.

CC. GR-19: Response Noted.

GR-20: Rain Garden @ NW corner.

Ex. grade +/- 142.5;
Per SLR-5 data, GW @ 3.5' deep (El. 139.0);
Prop. Bottom of RG = 139.0;
Bottom of Gravel = 136.0;

Rain Garden will not function as the underlaying materials will be below groundwater.

R.CC-GR-20: An underdrain has been added to the rain garden. Only a small portion of overland flow reaches the rain garden, so it is not expected affect the function of the rain garden for water quality storage during the first flush of storm events. Rain garden detail has been revised. The overall water quality volume provided is 35% greater than what is required by the new CT DEEP stormwater manual. Rain garden detail has been revised.

CC. GR-20: Detail refers to plan for location of underdrain. Not shown on plan at SW corner. Is underdrain to be wrapped in filter fabric? Is underdrain to be in existing soil or bedding material. Provide detail for underdrain.

Sheet 8 Site Plan-Utilities

UT-1: The plan appears to indicate only one stormwater discharge from the building (located on south side Inv=143.2). Other connections to the underground drainage system may be necessary at other parts of the building. Note all drainage piping from building and note if it is roof drainage only.

R. UT-1: The final number of connections will not be determined until a plumbing engineer is engaged for the building permit submission.

CC. UT-1: As these connections relate to the stormwater system design, they should be indicated on the plans.

CC. UT-1: Not addressed. No response offered.

UT-3: Show garage floor drains and piping. Provide oil / grease separator for garage floor drains. Show connection to sanitary sewer.

R. UT-3: There are no drains proposed within the garage. The ground floor is pitched to flow to the cobble infiltration trench.

CC. UT-3: This may result in an icing condition as runoff from vehicles may freeze. Drains should be provided at adequate intervals to provide sufficient collection of runoff.

R.CC-UT-3: It is the design team's opinion that a drainage system is not needed for the garage.

CC. UT-3: The need for floor drains, oil / water separator and connection to sanitary sewer to be determined at the time of submission for the building permit.

UT-6: The elevation of the 12-inch HDPE inletting to CCB 18 should be confirmed at the crossing of the water and fire service to insure adequate separation.

R. UT-6: It is our opinion adequate separation will be provided.

CC. UT-6: Provide detail or note regarding crossing of water and gas mains and note minimum separation.

CC. UT-6: Not addressed. No response offered.

UT-7: The inlet pipe (12-inch) appears undersized to convey flow from the building roof (1.8 acres) to MH-13 and

into the detention chambers.

R. UT-7: The inlet pipe has been resized, but the final pipe size will be determined when a plumbing engineer is engaged for the Building Permit submission.

CC. UT-7: As noted above, roof drainage design impacts the design of the site stormwater system. Provide complete drainage plan, including roof drains.

CC. UT-7: Not addressed. No response offered.

UT-11: Show connection to underslab and / or foundation drainage.

R. UT-11: A foundation drain has been added to the plans.

CC. UT-11: Foundation drain not observed on the plans.

CC. UT-11: Footing drain "FD" shown at SE corner of building. Building footings may be much lower due to garage floor elevations. Suggest connecting footing drain to drainage lower than the proposed footings.

UT-17: Show any wall drains and connections to storm drainage system.

R. UT-17: Wall drains and connections to storm drainage system have been added to Sheet UT.

CC. UT-17: Suggest wall drain at Wall #4.

CC. UT-17: Not addressed. No response offered.

UT-19: Provide details for MH-15, MH-12 and MH-5 – f ft. dia. with weir.

R. UT-19: Details have been provided on Sheet SD-5.

CC. UT-19: Review details. MH-12 inverts do not match detail drawing or plan. MH-15 inverts do not match detail drawing. Weir elevations appear incorrect. 7" orifice shown, 6" orifice noted. MH-4 inverts do not match plan. Any revisions should be consistent with drainage report.

R.CC-UT-19: Outlet Control Structure details have been revised to conform with the plan and drainage report.

CC. UT-19: MH-15: Weir orifice elevations (143.64) are higher than inlet pipe invert (143.25). Similar at MH-4. How do systems drain?

UT-27: Show location of gas meter.

R. UT-27: This detailed information will be shown on the building permit submission once the architect and mechanical engineer has coordinated with Eversource.

CC. UT-27: Location of the gas meter is an important part of a site plan. It will require access, a concrete pad, modifications to the design of the walks, etc.

CC. UT-27: Gas meter location not shown on plans.

UT-30: Water meter vault shown adjacent to retaining wall. Wall footing and vault may be in conflict.

R. UT-30: The water meter vault has been moved.

CC. UT-30: Water meter vault size does not match the detail. Provide correct detail. Coordinate location of proposed plantings with meter vault to provide access.

CC. UT-30: Not addressed. No response offered.

UT-33: Has a subsurface soils investigation (borings, test pits) been conducted in the area of infiltration areas and subsurface stormwater storage systems? What is depth to rock / ledge? What is the soil type? Will soil provide infiltration (well drained) or will it retain water (silt / clays). Total depth to bottom of stone from existing grade is up to 7.5 feet.

R. UT-33: Boring data has been added to Sheet NL and infiltration tests added into the Drainage Report.

CC. UT-33: Boring data on Sheet NL does not correspond with boring logs and test data. Per Tri-State test data, the borings contained more silt than described on Sheet NL.

SLR-5: 23.4% passing #200 sieve is Some Silt, not "Trace Silt".

SLR-6: 12.0% passing #200 sieve is Little Silt, not "Trace Silt".

SLR-7: 21.5% passing #200 sieve is Some Silt, not "Trace Silt".

SLR-8: 13.2% passing #200 sieve is Little Silt, not "Trace Silt"

R. CC-UT-33: Boring data has been revised.

CC. UT-33: Response noted.

UT-35: Provide manifold to connect underground detention system rows. The underground detention systems should be labeled to prevent confusion since they are located on the south side and two are close to the same size.

R. UT-35: Manifolds have been added to the underground chamber systems and the systems have been labeled.

CC. UT-35: Typically, the manifold is connected to each row of chambers.

R. CC-UT-35: Manifold pipes have been revised to show connections to each row of chambers.

CC. UT-35: Response noted.

UT-38: Suggest providing a sump at MH-9, MH-16 & MH-22 at inlets to isolator rows. Provide detail.

R. UT-38: A sump is not needed at MH-9, MH-16, & MH-22. The isolator row will collect sediment and provide water quality.

CC. UT-38: Per Stormtech SC-740 Isolator Row Detail, a 24" sump is recommended at the inlet manhole.

R. CC-UT-38: All manholes prior to the isolator rows are now hydrodynamic separators to assist with the collection of sediment.

CC. UT-38: Response noted.

UT-39: OVFL-25 -Consider considerably shortening the 8" HDPE and using a manhole to the east of the infiltration area and matching crowns with the 15" pipe.

R. UT-39: Manhole 25A has been added to the plans.

CC. UT-39: Suggest keeping stormwater that has been treated separate from the stormwater that has not been treated, otherwise, the "clean" stormwater will become compromised and require cleaning. This also will increase

the size of the required treatment measure.

R.CC-UT-39: Due to the site layout, keeping treated stormwater separate would be difficult, but the hydrodynamic separators are sized accordingly for the full flow.

CC. UT-39: Drainage layout continues to combine “clean” stormwater with untreated stormwater. Suggest installing a separator between CCB-26 and MH-25A. Connect MH-22 to a manhole between MH-2 and the outfall. MH-2 would treat stormwater from CCB-6 only. It appears that MH-2 is not sized to handle 100% of the runoff from the site.

UT-40: Consider backflow preventers or check valves to 8” HDPE outlets from infiltration areas to protect the stormwater system from the river during flooding.

R. UT-40: The plans call for a flap gate at the outlet to the Norwalk River.

CC. UT-40: The drainage system could still get floodwater if the river elevation rises above 141.1 (at OVFL-3) and 141.3 (at OVFL-25).

R. CC-UT-40: Backflow preventers have been added to the pipes.

CC. UT-40: Response noted.

UT-44: The outfall, including the required grading and riprap splash pad, require work directly within the limits of the inland wetlands. Provide calculations to show that the remaining streambank will be stabilized and not subject to erosion due to the discharge of stormwater. The riprap pad may need to be installed further towards the river.

R. UT-44: The riprap has been sized properly based on size of outlet pipe, velocity, and flow. Calculations can be found in the. Riprap will be provided on all disturbed side slopes from the headwall to the river.

CC. UT-44: See CC-RPT-3. The Norwalk River tailwater should be part of the design. The pad seems to be larger than necessary. Possibly the 24” pipe could be shortened to reduce impacts to the OHW.

CC. UT-44: Not addressed. No response offered. Outlet pipe size changed from 24” dia. to 36” dia. Revise grading to acc 36” Dia. RCP. Top of endwall elevation = 141.8. Top of pipe @ endwall = 140.6±.

UT-45: MH-13 (CASCASE CS-4): MH-13 is connected to roof drains. A separator is not necessary as roof drainage is typically considered “clean”. Also, it is a “CASCADE CS-4”. MH-5 should be a hydrodynamic separator as it discharges run-off from the surface drainage system to the infiltration units. Isolator rows are difficult to maintain and clean. Silt can infiltrate into the stone layer, limiting the infiltration capacity of the systems.

R.CC-UT-45: The Hydrodynamic separator has been removed from MH-13. A hydrodynamic separator has been added to MH-2, MH-5, and MH-21.

CC. UT-45: Response noted.

UT-46: Foundation drain at SE corner of building inv. = 152.2. Fin. Grade = 152.7 +/- . Provide invert for FD at MH-16.

R.CC-UT-46: Inverts have been revised and provided for the foundation drain.

CC. UT-46: Response noted.

UT-47: MH-5: Invert to isolator row should be lower than invert to north to allow for treatment of the first inch of

runoff (“first flush”).

R.CC-UT-47: The invert to the isolator row has been lowered to allow for treatment of the first flush.

CC. UT-47: Response noted.

UT-48: 24” HDPE from MH-5 to isolator row: Cover less than 2 feet.

R.CC-UT-48: The invert has been lowered to maintain 2 feet. Of cover.

CC. UT-48: MH-5 TF = 144.50. Inv. 24” HDPE = 141.24. Top 24” HDPE = 143.40. 1.1 ft. of cover provided.

UT-49: Provide inverts of 6” curtain drain along Wall #1. Based on wall detail, the invert at the west end of the wall = 144.7. Fin. Grade = 145.9. Cover < 1 ft. Suggest connecting curtain drain to CCB 7, 10, 14 to shorten segment lengths.

R.CC-UT-49: Inverts have been added to the end of the 6” curtain drain along Wall #1, and to the tie-in to CCB-6.

CC. UT-49: Response noted.

UT-50: MH-2: Invert in N (137.6) is lower than invert out W (137.8). Suggest raising invert of 12” HDPE from CCB-6 to match crown of outlet pipe.

R.CC-UT-50: Inverts in MH 10 have been revised. Due to the site elevation constraints, we are unable to match crowns.

CC. UT-50: Inv. 36” RCP = 137.6. Top of pipe elev. = 140.93. TF MH-2 – 142.1. Cover = 1.17 ft.

UT-51: Review invert of 8” HDPE from OVFL-3 at connection to 24” HDPE. It appears the invert of the 8” HDPE at the 24” HDPE is higher than the invert at OVFL-3.

R.CC-UT-51: The invert at OVFL-3 is 137.8. The invert at the 24” HDPE is 137.65.

CC. UT-51: With a TEE connection, the invert of the 8” HDPE at the 4” HDPE is ±8” higher than the invert of the 24” HDPE. Therefore, the invert of the 8” HDPE @ the 24” HDPE is ±138.3.

UT-52: Riprap splash pad: Provide additional information. Note size of stone. Note depth to bedding layer. Detail calls for RCP pipe and culvert end. Coordinate with plan. Is filter fabric / geotextile included in the installation?

R.CC-UT-52: See Rip Rap Splash Pad detail on Sheet SD-4 for all requested information. Detail has been revised for RCP or HDPE flared end section. Filter fabric is not included in the installation.

CC. UT-52: Revise detail. It appears W2 dimension (9 ft.) is incorrect for 36” pipe. 6” riprap is not adequate for a splash pad along the Norwalk River. River velocities will displace the material. Design the outlet splash pad based on the velocity of the river.

UT-53: MH-13: Inv out S (144.0) is higher than Inv out W (143.1). Recommend inverts to be the same.

R.CC-UT-53: Inverts in MH 13 have been revised.

CC. UT-53: Response noted.

UT-54: CCB-18: Inv out S (145.9) is higher than Inv in N (145.6).

R.CC-UT-54: Inverts in CCB 18 have been revised.

CC. UT-54: Response noted.

UT-55: 12" HDPE from CCB-29 to CCB-28 passes under the generator. Suggest adding a structure to avoid having the pipe under the generator. Also, this pipe appears to conflict with a light pole base in parking lot.

R.CC-UT-55: 12" HDPE has been revised to avoid the generator and light pole.

CC. UT-55: Response noted.

UT-56: In general, good hydraulic design is when the inlet pipe is smaller than the outlet pipe, the inverts should be the difference in the diameter (min.).

R.CC-UT-56: Due to the flat nature of the western portion of the site and limited elevation change before discharging to the Norwalk River, it is not possible to match pipe crowns. Hydraulic models and pipe computations have been performed to show that the pipes will be able to accommodate the flows and there are no hydraulic grade line issues for the design storm within the system. All pipes have been sized according to the design flow required in the pipe.

CC. UT-56: Response noted.

UT-57: Wall #4 – show wall drain or note that weeps are to be provided per the detail.

CC. UT-57: Not addressed. No response offered.

UT-58: Provide water service shut-off at streetline.

CC. UT-58: Not addressed. No response offered.

UT-59: A light pole base in parking lot along curb line appears to conflict with 12" pipe from CCB-27 to CCB-28.

CC. UT-59: Not addressed. No response offered. Light poles not shown on plans.

UT-60: The drainage report uses a 6-inch stone base for the S-1 detention system, but the detail calls for a minimum 12 inches.

R.CC-UT-60: The Stormtech SC-740 Typical Cross Section detail has been revised. S-1 and S-3 will have 6 inches of stone base and S-2 will have 12 inches of stone base.

CC. UT-60: Response noted.

Sheet 9 Sediment and Erosion Control Plan

SE-1-4: Proposed silt fence and straw wattles at drainage endwall cross riprap splash pad. Suggest turbidity curtain along river in this location due to excavation along river bank.

R. SE-1-4: No riverbank excavation is needed except for where the outlet pipe is proposed. We believe the turbidity curtain would not be appropriate with the flowing water.

CC. SE-1-4: Provide measures to protect the river during construction at the outlet.

R. CC-SE-1-4: Silt fence and straw wattles have been added at the outlet to protect the river.

CC. SE-1-4: Silt fence and straw wattles are located within the ordinary high water of the river. As noted in the original comment. An alternate measure to protect the river from sediment shall be submitted for review.

SE-1-7: Construction entrance pads are located in areas of fills up to 5 feet.

R. SE-1-7: The entrance pad in areas of fill will be rebuilt as the grade is raised and adjusted during construction.

CC. SE-1-7: Provide note / call-out.

R. CC-SE-1-7: A note has been added to sheet SE-1.

CC. SE-1-7: Response noted.

SE-1-8: Silt fence along southern property line is shown on top of the existing stone wall and within the existing swale.

R. SE-1-8: The silt fence has been adjusted.

CC. SE-1-8: Silt fence should be located at the bottom of the proposed slope.

R. CC-SE-1-8: Silt fence has been provided at the boundary of the area of disturbance.

CC. SE-1-8: Response noted.

SE-1-9: The location of sediment traps and dirt bags should be located out of the floodplain. Grading of sediment traps should be mindful of groundwater elevations.

R. SE-1-9: It is necessary to have the sediment traps within the lower portion of the site to be the most effective and to capture the entire watershed.

CC. SE-1-9: As the lower portion of the site is subject to flooding even during a 10-year storm event (per FEMA), provide measures to protect the sediment traps from flooding and depositing sediments into the river during storm events.

R. CC-SE-1-9: A layer of straw wattles have been added to the river side of the proposed sediment traps.

CC. SE-1-9: Silt fence and straw wattles will not protect the river during flooding events. Provide measures that will prevent the deposit of collected sediments from the basins into the river during storm events.

Sheet 10 Sediment and Erosion Control Specifications and Details

SE-2-3: Provide inlet control detail for domed yard drains.

R. SE-2-3: The inlet control detail for the domed yard drains would be the same as all other inlet protection details.

CC. SE-2-3: Inlet Protection (“Silt Sack”) detail does not apply to 18” dia. pipe. Provide detail or call-out.

R. CC-SE-2-3: Pipe stopper by Silt Saver has been added to the plans for use in the 18” diameter pipes. Detail has been added to sheet SE-2.

CC. SE-2-3: Response noted.

SE-2-5: The dewatering plan requested by the town should have associated dewatering details such as a settling basin for dewatering discharges.

R. SE-2-5: A dewatering plan will be prepared with the building permit submission.

CC. SE-2-5: As the Town's comments are related to this application, the dewatering plan should be submitted at this time.

R. CC-SE-2-5: Dewatering details have been added to the plans. The contractor will prepare the dewatering plan during the building permit phase. The Town Engineer's comments have acknowledged that the dewatering plan will be submitted during the building permit phase.

CC. SE-2-5: Response noted.

Sheet 11 Site Details SD-1

SD-1-1: The sheet shows details for stamped & colored sidewalk, concrete pavers along integral concrete walk. It is not clear on the plans where these are going to be installed. Additional call outs seem appropriate.

R. SD-1-1: Callouts have been added to the plans to coordinate with the details.

CC. SD-1-1: Where is integral concrete sidewalk and curb? Not observed on plans.

CC. SD-1-1: Not addressed. No response offered. Integral sidewalk and curb should be identified on the plans.

Sheet 12 Site Details SD-2

SD-2-4: Provide transformer pad detail.

R. SD-2-4: Utility pad detail has been added to Sheet SD-1.

CC. SD-2-4: Concrete Utility Pad detail is not a transformer pad. Transformer pads are typically 2'-7" to 3' deep. Coordinate pad size with Eversource.

CC. SD-2-4: Not addressed. No response offered.

Sheet 13 Site Details SD-3

SD-3-4: Concrete Ramp at Building Face – Suggest detail for entranceway. We do not recommend pavers at the doorway as pavers may move as a result of frost, etc. and prevent the door from opening.

R. SD-3-4: Pavers will be set on concrete and will not heave as a result of frost.

CC. SD-3-4: Note on Sheet LA where pavers are to be set on concrete.

CC. SD-3-4: Not addressed. No response offered.

Sheet 14 Site Details SD-4

SD-4-2: Provide flap gate detail.

R. SD-4-2: A flap gate detail has been added to Sheet SD-4.

CC. SD-4-2: Note which gate is to be provided.

R. CC-SD-4-2: AF-41 Flatback, 24" flap gate to be used. A note has been added to the detail.

CC. SD-4-2: Outlet pipe is 36" RCP. Gate appears to be in incorrect location on the detail.

SD-4-5: Provide riprap splash pad detail for endwall outlet.

R. SD-4-5: Riprap splash pad has been sized for the end wall outlet..

CC. SD-4-5: Note riprap size. Modify depth as required. Note depth of bedding. Note if non-woven filter fabric is required.

R. CC-SD-4-5: All requested information is provided in the Outlet Protection table.

CC. SD-4-5: Response noted.

SD-4-7: Storm Trench Detail – Note Final Backfill material if existing material is deemed unsuitable.

R. SD-4-7: A note has been added to the storm trench detail.

CC. SD-4-7: It should be noted that the backfill material shall be approved by the Engineer.

R. CC-SD-4-7: Note has been added to the Storm Drainage Trench detail.

CC. SD-4-7: Review notes. Note 2. appears to be incomplete.

Sheet 15 Site Details SD-5

SD-5-1: Provide water meter pit detail.

R. SD-5-1: A water meter pit detail has been provided on Sheet SD-6.

CC. SD-5-1: Water meter vault detail does not match vault shown on Sheet UT. Verify that a 2" meter appropriate for a 4" dia. water service.

SD-5-3: CTDOT Trench Repair Detail – Typically, state road sections include 9 inches of pavement. Provide verification that CTDOT has approved the pavement repair detail

R. SD-5-2: The final pavement section will be determined by the CTDOT as part of the Encroachment Permit process.

CC. SD-5-2: Include CTDOT standard pavement section as part of this submission.

Sheet 16 Site Details SD-6

SD-6-1: Sanitary Cleanout Detail: Size not provided. Suggest not installing steel rod as may cause damage to mowers, etc. Suggest using a cast iron valve cover.

CC. SD-6-1: Not addressed. No response offered.

SD-6-2: Provide water meter vault detail for 4" service.

CC. SD-6-2: Not addressed. No response offered.

Sheet 17 Site Details SD-7

SD-7-1: Solid Board Privacy Fence: Are posts to be set in concrete? Provide detail.

CC. SD-7-1: Not addressed. No response offered.

Site Plan – Alternative Compared

A description of the alternatives should be provided. Although only a sketch is required for the alternatives, additional details such as any proposed plantings, storm drainage, rain gardens or other stormwater treatment measures, etc. should be called out.

R: The alternative plan was provided for discussion, and we believe the proposed plan is superior to the alternate plan. We are ready to discuss further with the Commission if requested.

CC: Provide additional detail for the alternative plan to allow for a better understanding of what is being proposed.

CC: Not addressed. No response offered.

Flood Preparation Plan – 2/8/24 Comments

R. Development in Floodplains in the Town of Wilton falls under the jurisdiction of the Planning & Zoning Commission vis-à-vis Section 29-9.F. of the Wilton Zoning Regulations "Development in Floodplains". The reviewer's comments are appreciated and will be incorporated into the currently DRAFT Flood Preparedness Plan if appropriate and feasible. The applicant proposes a project that complies with Zoning Regulation, and National Flood Insurance Program Standards, which requires the first floor and supporting mechanical systems to be elevated above the Base Flood Elevation and permits the parking of vehicles below the Base Flood Elevation.

CC-FPP: As stated during our reviews, some of our comments may not be applicable to the Inland Wetlands application, but may be applicable to other pertinent matters for the project or related to engineering design practices/standards. With that said, the applicant stated that a Flood Preparedness Plan was prepared when responding to two public comments in the Inland Wetland application process (January 31, 2024). We request a copy of the revised Flood Preparedness Plan so that it can be reviewed with regard to public comment response.

Construction Management Plan – 2/8/24 Comments

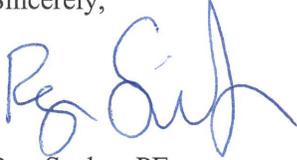
R. It is our professional opinion the Sediment and Erosion Control Plan is adequate to protect the Norwalk River from the temporary impacts and disturbances associated with construction activities. The reviewer's comments are appreciated and will be incorporated into the currently DRAFT Construction Management Plan if appropriate and feasible once a contractor is selected and prior to the commencement of construction.

CC: The Construction Management Plan has been submitted as part of the Inland Wetlands application and comments on the plan should be addressed during the local wetlands permitting process. Although several comments were submitted as part of our review, all of the comments aren't equal in importance as relates to

protection of the existing wetlands and watercourses. Comments CMP-01, CMP-06, and CMP-08 can be considered most important. CMP-01 relates to phasing or demonstration that soil disturbance is minimized over the construction period. Comment CMP-06 directly relates to wetland impacts and CMP-08 is directly related to floodplain storage. Responses to CMP-01, CMP-06, and CMP-08 should be submitted along with revisions of the engineering plans independent of the contractor selection process. Related to this, additional detail for the protection of the Norwalk River at the 36" dia. RCP outfall and for protecting the work at this location from impacts of the river during construction should be provided.

Based on our comments, we anticipate that the applicant will need further revisions to the current plan set along with the Flood Preparedness Plan and Construction Management Plan as part of the town's inland wetlands permit process. We anticipate that additional review will be required once these revised materials are submitted. If you have any questions or require additional information, please feel free to contact us at 203-238-1969.

Sincerely,



Roy Seelye, PE
Senior Project Manager



Darin Lemire, PE, CPESC, CPSWQ
Senior Hydraulic Engineer