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February 8, 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 December 14, 2023.

Reviewed application documents received on January 31, 2024 include:

- Response to public comment letter. dated January 31, 2024. Agent: Craig Flaherty, Redniss & Mead.
- Preliminary Construction Management Plan, dated January 30, 2024, Prepared by AMS Construction Management, LLC.
- Flood Preparedness Plan, dated January 31, 2024, Prepared by Redness & Mead.

Based on a review of the above application documents, we offer the following comments for your consideration. This report was prepared to provide comments during the Inland Wetlands and Watercourses Agency application process. Some of the comments may not be applicable to the Inland Wetlands Application, but may be applicable to consistency with the 2004 Connecticut Stormwater Quality Manual, CTDOT Drainage Manual, 2002 Connecticut Guidelines for Erosion and Sediment Control, NPDES/MS4 standards, State Statutes, and current civil engineering design practices/standards.

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 relocation of vehicles to public facilities during storm events is not allowed. If an

event happens during a weekday, then the schools are already used up, same with the other locations. Comstock Community Center is an emergency shelter and the schools may also be used as emergency shelters. Municipal lots are also used for brush management in an emergency. An alternative relocation plan, including a type of agreement with private parking lots out of the flood zone is required. Copies of the executed agreements shall be submitted prior to issuance of building permits.

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

Redniss & Mead 1/31/24 Public Comment Response Letter

PCR-01: Question 1 – Post Construction Changes in Flood Pattern and Vehicle Relocation: Vehicle access is limited if not completely unavailable during flooding events. The access drive to the under-building parking area is subject up to 3 feet of flooding during the 100-year storm event. Notification for relocating vehicles is left primarily to the residents themselves and relies on the availability of parking at town-owned facilities. Use of public facilities for parking during storm events is not permitted and an alternative plan for relocating vehicles is required.

PCR-02: Question 2 – Control of Flood Water: The public comment response by Redniss & Mead references the floodplain analysis report (Floodplain Analysis prepared by SLR, dated November 27, 2023) prepared for the project. Cardinal issued comments to the Town of Wilton on that report on January 19, 2024 and is awaiting a response showing the comments have been addressed. The Cardinal comments requested included revised limits of the 100-year and 500 floods on the plans, additional details/written description on the modeling conducted, additional hydraulic modeling of the river (using HEC-RAS), and revised earthwork calculations.

PCR-03: Question 3 – Emergency Access During Storm Events: The response only includes that access is provided across the front of the site. However, during the 100-year storm event, the area at the rear of the building will be flooded as much as 4 feet, including approximately 3 feet of water at the garage level entrance / exit. In addition, the stabilized turf emergency route has dimensions (larger width with wider turn radii) that accommodates larger emergency vehicles so the front entrance appears to need to be consistent with the more accommodating design. A second lane in front may be warranted so a parked emergency vehicle doesn't prevent egress from the site.

PCR-04: Question 4 – Relocation of Vehicles During Flood Events and Impact on Route 7: What guarantees are there that all tenants will be presented with a copy of the Flood Preparation Plan (FPP) prior to the signing of a lease? The FPP relies on the tenants to be proactive in signing-up for the Town of Wilton notification system, monitoring weather reports, etc. History has shown us that events such as Hurricane Irene, Superstorm Sandy and recent events in Norwich can provide little advanced warning of significant flooding events. It is our understanding that many of the tenants may work outside of Wilton, NYC in particular, and may not be able to return in time to move vehicles during a rapidly changing flooding condition. As the site is subject to flooding for smaller storms such as the area is subject to up to 18" of water during a 10-year storm, what precautions are proposed for these situations? As noted

above, the use of public facilities for parking during storm events is not permitted by the Town of Wilton. Alternative plans, including agreements with privately owned parking facilities, shall be submitted.

PCR-05: Question 5 – Building Egress during Flooding Events: As noted above, the FPP relies heavily on the tenants to be informed of anticipated storm events. Provide location and details of permanent signage within parking areas noting the areas subject to flooding.

PCR-06: Concluding Paragraph: It is stated that the plan for 131 Danbury Road is similar to the plan for the adjacent property, 141 Danbury Road. This is not entirely true as the adjacent site is higher than 131 Danbury Road, therefore subject to less flooding. Also, the majority of the under-building parking at 141 Danbury Road has egress available on the north side of the building above the limits of the 100-year flood while the entire parking area under the building for 131 Danbury Road is subject to flooding and the access point may be flooded to a depth of approximately 3 feet.

Preliminary Construction Management Plan

CMP-01: Page 2 of the narrative under project phasing describes a single phase construction period lasting 2.5 years which is not reasonable. Due to the long duration of the project, the project should be broken down into phases. The phases should demonstrate that the area of soil disturbed at one time is minimized. There should be some description how the phases related to the stages.

CMP-02: The Logistic Plan needs to be revised with revised temporary soil stockpile areas in front of the building. The latest set of civil drawings shows different layout (2 smaller piles instead of 1 large pile). The plan also conflicts with location of E&S controls such as the sediment trap TST 1, and the stone check dams.

CMP-03: Under description of E&S measures in Stage 1, the other measures to be used should be included (e.g. sediment traps, straw wattles, inlet protection, etc.)

CMP-04: Under the description of Stage 1 in the narrative or in the site security section, it should be specified that it will be a chain link fence and type (posts driven, supported by sand bags, etc.). The layout of the construction fencing at the gates on the logistic plan should be pushed into the site so construction vehicles can pull up to each of the gates on the site without their back end extending out into the roadway and causing traffic issues.

CMP-05: Under the stage 1 description in the narrative, it mentions temporary offices will be constructed, but it appears that would only consist of a construction trailer that will be located on the south side. The language should be consistent with the logistic plan.

CMP-06: There doesn't appear to be a good reason to extend the temporary fencing into the wetlands and down the banks of the river which could have additional impacts.

CMP-07: The installation of the walls at the site should be included in the stage writeup. There is approximately 700 feet of walls on the site and it is a significant part of the grading effort at the site.

CMP-08: The logistic plan should not show material staging in the floodplain. This occupies flood storage capacity. Once the existing building is removed, the former footprint could be used for storage.

CMP-09: The 50-foot buffer to the Norwalk River is mentioned which is a good step, but it should be carried through to the logistic plan and described how it will be implemented at the site. It is recommended to put up temporary fencing along this section so the area would not be encroached upon during the long construction period.

CMP-10: The construction narrative should include additional information related to the removal of the existing building. Items that should be addressed include how building materials are going to be removed from the site (truck logistics is listed, but there is no description including where trucks would be loaded), construction equipment storage, if abatement needs to be performed, and if protective netting or other barriers are going to be used to prevent the offsite migration of materials. Some of these items might be addressed in comments related to the plan set that have yet to be submitted.

CMP-11: The narrative should include the handling of any building fuel or waste oil tank contents. These contents need to be pumped out and the contents brought to an approved disposal area by a licensed waste hauler. This includes the contents of the aboveground storage tank on the south side of the building.

CMP-12: Under stage 2, utilities are mentioned, but without significant detail. The utilities should be listed with the name of the utility and contact information if available.

CMP-13: Under stage 3 utilities, there is no description of the transformers and the gas generator.

CMP-14: Storage areas on the logistics plan should include dimensions or note sizes in feet so they are significantly large. Note earlier comment about conflicts with engineering plans.

CMP-16: In stage 7, it mentions landscaping will be completed, but this is season dependent so landscaping may need to wait until there is suitable weather.

CMP-17: Temporary sanitary facilities should be shown on plan.

CMP-18: Under Soil & Sedimentation Controls, it lists that the site will be prepared for significant rainfall events. The Flood Preparedness Plan should be referenced since it describes those procedures.

CMP-19: Confirm whether a SWPPP has been prepared and implemented. The site is disturbed less than 5 acres and it is our understanding that a Construction Stormwater GP is not being

submitted.

CMP-20: It should be included that site inspections log will be available at the site.

Flood Preparedness Plan

FPP-01: See critical comments above as relates to the relocation of vehicles to public facilities during storm events. The selection of locations should be given preference to locations east of the Norwalk River if the expected crossing may be overtopped by the river.

FPP-02: The orientation map shows only the immediate site and surrounding area. Additional maps appear necessary to show more of Norwalk since part of plan is to move vehicles off site. Maps used should have an approximate scale and north arrow

FPP-03: The table of contents should be updated to show which storms are shown on Figure 1.

FPP-04: The property description in the introduction should indicate what is a severe flood for the site. Obviously, the site is very prone to flooding at storm events that happen more frequently than the 100-year storm.

FPP-05: The plan should include the FEMA flood map.

FPP-06: The plan should include a table with the flood elevations at the site for the different flood events (e.g. 10, 25, 50, 100, 500 year). The precipitation amounts correlating to the storms should be provided for the 6-hour and 24-hour storm events. In the past few years including the storms in 2021 (Tropical Storm Elsa and Tropical Storm Ida), the storms have been 6-hour storm events (quick and intense storm events).

FPP-07: A table of important flood elevations should be provided to allow elevation data to be quickly determined during an emergency.

FPP-08: The plan would benefit from listing when emergency event has developed. That needs to be determined for the residents and they are to be notified there is an emergency event. Absolute values (rainfall amount at what location and river levels at which gage) need to be set of when an emergency will be declared.

FPP-09: The Flood Preparedness Plan (FPP) uses terms such as "should". Replace terms such as "should" with "shall".

FPP-10: The vehicle relocation exhibit should include a plan of each location where vehicles are going to be parked including where on the site the approved parking will be located.

FPP-11: The flood warning procedure is written in a manner that Town of Wilton Code Red notification system. It should be indicated that this should be monitored, but other emergency communications should be monitored simultaneously.

FPP-12: The plan would benefit to having a section in the beginning of the roles and responsibilities of residents, building owner, and property management. There is implied roles and responsibilities in the document and they should be more explicitly stated.

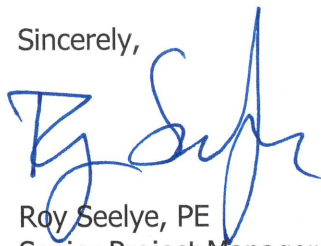
FPP-13: The plan would benefit from a table listing emergency service contacts that may need to be contacted during a flooding emergency (e.g. Town of Wilton emergency operations, Wilton Police, Wilton Fire Dept, Owners engineer, etc.)

FPP-14: Recommend including WTNH Channel 8 news for additional television station.

FPP-15: A USGS gage in Norwalk is listed, but it should be clear that this is downstream and the water surface at the gage is significantly different than the site. The elevation at the site in relation to the gage should be determined and provided.

Based on our comments, we anticipate that the applicant will need further revisions to the Construction Management Plan and the Flood Preparedness Plan. Revisions will also be expected to make them consistent with the revised engineering plans. Based on this, we anticipate that an additional review will be required after the revised plans are prepared. 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