

January 8, 2024

Frank Smeriglio, P.E.
Director of Public Works / Town Engineer
Town Hall
238 Danbury Road
Wilton, CT 06897

RE: Response to January 5, 2024, memo to the WPCA
Project Address: 131 Danbury Road
Applicant: 131 Danbury Wilton Dev AMS LLC, an affiliate of AMS Acquisitions, LLC

Dear Mr. Smeriglio,

We are in receipt of your memorandum to the Water Pollution Control Authority dated January 5, 2024, and provide the following response.

A summary of the proposal and background is bulleted below:

- 131 Danbury Road is and has been connected to the public sanitary sewer system since approvals were granted in 1978. Based on town records there are two, six-inch pipes exiting the building and connecting to the 24-inch main in Danbury Road.
- The proposal seeks to demolish the existing commercial structure (50,953sf) on the site and replace it with an apartment building (208 apartment with 329 bedrooms). The proposal complies fully with the Wilton Zoning Regulations requirements for the DE-5R zone, which zone is eligible to be applied to the subject property. No zoning text amendment or variance is requested. The two existing connections to the street will be abandoned and replaced with one connection.
- An analysis by Tom Daly, PE of SLR Consulting dated November 16, 2023, concludes that there is ample capacity in the existing 24-inch main in Danbury Road to accommodate the development.
- This proposal is similar in scope to 141 Danbury Road which included the demolition of a 47,040sf commercial building and construction of an apartment building with 173 apartments with 312 bedrooms. Erik Lindquist, PE of Tighe & Bond prepared a Sewer Study dated January 3, 2022, that concluded the existing sewer main in Danbury Road will have ample capacity to receive the additional flow being generated from the 141 Danbury Road development.

- 131 Danbury Road is immediately adjacent to 141 Danbury Road and connects to the same sewer main.
- On February 14, 2022, the WPCA approved, with conditions, the continued connection of 141 Danbury Road to the sanitary sewer system for the proposed 173 apartments with 312 bedrooms including a pool for resident use.

Specific responses to numerated items of your memorandum are provided below:

1. Noted
2. To be clear, the analysis of the physical capacity of the receiving sewers and the design and sizing of the proposed building lateral presented by SLR and submitted with this request assumes a Design Flow of 150 gallons per day, per bedroom. No change to this Design Flow is proposed. This is now a conservative standard since the Connecticut Public Health Code Standards on Subsurface Sewage Disposal System was recently updated in January 2024 to lower the Design Flow to 125 gallons per bedroom per day for multi-family residential buildings (after the first three bedrooms).

The referenced flow of 55 gallons per day per bedroom is from a Water Use Study prepared by this office dated November 3, 2023, and is the actual Average Annual Water Use per bedroom per day measured at 15 different properties housing a total of 1,784 apartments and 2,428 bedrooms. The Average Annual Water Use is not the same as the Daily Design Flow. In fact, these numbers are very different in use and scale. The Daily Design Flow is used to ascertain the peak use and rate of water discharge on a single day. The Average Annual Flow is the total water use over an entire year. This number was studied and presented in relation to the language of Wilton's Interlocal Agreement with Norwalk which, in Exhibit C, cites a limit based on 'annual average daily' flow which is the Annual Water Use divided by the number of days in a calendar year. The Design Flow is used to determine and size the physical capacity of the sewer system and associated infrastructure. The Average Annual Water Use is best used in relation to the language of the Interlocal Agreement.

- a. See item 3 below.
 - b. No limit of building or apartment occupancy is proposed or appropriate.
 - c. See above.
 - d. The ancillary discharges from building support staff and administration are captured in the conservatively used Design Flow as well as the Water Use Study.
3. The proposed pool will utilize a cartridge-based filtration system which does not require backwash. Therefore, there will be no regular discharge from the swimming pool to the sewer system. Swimming pools are only emptied when rare maintenance conditions so require (once

every several years). Should such maintenance be required, the applicant will follow the timing requirements determined to be most appropriate by the Wilton WPCA.

4. Calculations were provided indicating that a six-inch pipe has sufficient capacity to accommodate peak flows from the proposed building. However, given the comment from the Norwalk WPCA, the lateral size has been changed to an eight-inch diameter as indicated on the updated plan dated January 5, 2024. Also indicated on the updated plan is a manhole at the connection point to the sewer main in the street.
5. See item 4 above.
6. No drains in the parking area below the building are proposed or required.

All other comments are noted.

Included herewith for your consideration is the updated Site Utility Plan and Site Details by SLR revised through January 5, 2024.

We look forward to presenting our request to the Authority at the upcoming meeting on January 10, 2024.

Sincerely,



Craig J. Flaherty, P.E.

cc: Frank Smeriglio, Town Engineer