

May 7, 2025

Planning and Zoning Commission
Town of Bethel
Clifford J. Hurgin Municipal Center
1 School Street
Bethel, CT 06801

SLR Project No.: 141.14494.00018

**RE: Site Plan Application Review Comments
72 Reservoir Street
Bethel, Connecticut**

Dear Commission Members,

SLR International Corporation (SLR) has reviewed application documents submitted to the Town of Bethel Planning and Zoning Commission (the "Commission") by One Knollwood Drive, LLC (the "Applicant") for the application to construct a 3-unit multi-family residential (8-30g) development at 72 Reservoir Street in Bethel, Connecticut.

SLR has reviewed the following application documents submitted by the applicant, in accordance with the Town of Bethel Zoning Regulations, the *2024 Connecticut Stormwater Quality Manual*, and the *2024 Connecticut Guidelines for Erosion and Sediment Control*, as well as general best management practices, as applicable:

- Planning & Zoning Commission application forms dated March 6, 2025.
- First Division Map prepared for One Knollwood Drive, LLC by New England Land Surveying, P.C. dated August 15, 2018 (pdf copy).
- Property Survey Map prepared for One Knollwood Drive, LLC by New England Land Surveying, P.C. dated February 21, 2025 (pdf copy).
- Site Plans prepared by Trinkaus Engineering, LLC dated February 11, 2025 (pdf copy not signed/sealed).
- Stormwater Report prepared by Trinkaus Engineering, LLC dated February 11, 2025 (pdf copy).
- Architectural Plans prepared by BBS Design, LLC revised September 27, 2017 (pdf copy).

Based on our review of the application documents received to date, we offer the following comments for consideration by the Commission and the Applicant:

1. The application forms and design documents refer to the applicant's property as 72 Reservoir Road. According to the survey plans provided by the applicant the property is recorded on town land records as 72 Reservoir Street. The application forms and design documents should be revised to reflect the property address as 72 Reservoir Street, as recorded in the town land records.

2. The submitted plans do not reference the source of the topographic survey information and elevations included on the existing conditions plan.
3. Provide field measurements of sight distances from proposed driveways.
4. Duplex building #1 is located only ± 13.5 feet from the edge of roadway pavement at the east side of Reservoir Street and ± 3.5 feet from the right-of-way line. At this distance there is a potential for snow, roadway deicing products and objects in the roadway that are contacted by town snow plows to be thrown onto the side of the building causing damage and/or degradation to the building. The property is located in a R-40 zone which has a 50-foot building setback from the property line along Reservoir Street. If the building was located in accordance with the 50' building setback it would be over 60 feet from the edge of roadway pavement.
5. SLR recommends the Bethel Police Chief review the location of Duplex building #1 relative to the edge of roadway on the east side of Reservoir Street to determine if a vehicle barrier is warranted between the roadway and building due to the close proximity of the building to the edge of the roadway pavement (± 13.5 feet). The property is located in a R-40 zone which has a 50-foot building setback from the property line along Reservoir Street. If the building was located in accordance with the 50' building setback it would be over 60 feet from the edge of roadway pavement.
6. The site plans show significant retaining walls proposed within the town-right-of-way which cannot be permitted without approval from the Town, including associated easement and maintenance agreements.
7. A line is shown on the site plans representing a rock cut as close as 3 feet to the adjacent property line shared with 74 Reservoir Street. Is ledge found to be at the surface in this area? Any overburden (soil) at the top of the ledge must be sloped back from the ledge at maximum of 2' horizontal to 1' vertical and stabilized with erosion control blankets to prevent slopes eroding across the property line.
8. A vertical rock cut up to 20 feet high is proposed within the town's right-of-way and within 1-foot of the property line between the town right-of-way and 1 Knollwood Drive. The rock cut abuts the south side of the proposed driveway for Duplex #3. This poses a significant safety concern and liability for the town.
9. A 10-foot building separation is provided between Duplex #1 and Duplex #2 and a 9' building separation is provided between Duplex #2 and Duplex #3. Both separations also include boulder retaining walls. SLR recommends the Bethel Fire Marshal review these building separations to determine whether minimum building spacing is achieved based on the proposed site conditions and to determine if adequate accessway width is provided between each building and the retaining walls between these buildings.
10. The driveway layouts for the 3 proposed buildings are almost entirely located within the Town of Bethel right-of-way with no parking areas on the applicant's property.



- All vehicles parking anywhere in the driveways serving these residences will be parking on town property, not on private property. Will the town be responsible for maintaining and eventually repaving these driveways? Will the town be liable if something happens to these vehicles or if people slip and fall on the proposed steep (6%-12%) driveway grades getting in and out of parked vehicles and walking on the driveways?
11. An existing utility pole (Pole #2465) is located with the proposed driveway for Duplex #1. The site plans should show this pole being relocated.
 12. An existing pad mounted electric transformer and communications access structure are shown locate within the proposed driveway to Duplex #3. This equipment should be separated from the driveway by at least 5' and be protected by vehicle bollards, or these structures should be relocated.
 13. Proposed elevation contours are missing from the proposed driveways. Proposed elevation contours must be shown connecting to the existing 388, 390 and 392 contours at the west curb line of Knollwood Drive. Similarly, the proposed 390 elevation contour is missing and not connected to the existing contour on the east side of Reservoir Street.
 14. The proposed elevation contour 388 and proposed contour 392 are shown joining together between Duplex #1 and Duplex #2 at the same point at the end of the retaining wall, which is not feasible. The proposed retaining wall between these buildings will need to extend further into the town right-of-way to allow for a surface graded transition between the proposed 388 and 392 contours at this location. The same issue applies at the other end of this retaining wall where the proposed 388 and 392 contours are joined at the same point at the end of the wall. Additionally, this issue exists for the proposed retaining wall between Duplex #2 and Duplex #3, where the proposed 392 contour joins the proposed 394 contour both ends of the wall in front of the buildings and behind the buildings.
 15. Retaining walls must be designed by a Connecticut licensed structural engineer. Rock cuts including catchment ditches and/or netting must be evaluated by a licensed geotechnical engineer.
 16. Fall protection fencing and/or rails should be provided along the top of all rock cut areas and retaining walls in accordance with Building Department requirements during and after completion of construction.
 17. The site plan shows proposed steep ground slopes of 2' horizontal to 1' vertical (2:1) within the town's right-of-way. A maximum slope of 3' horizontal to 1' vertical should be provided within the town's right-of-way to minimize the potential for soil erosion and provide a safe slope for maintenance equipment.
 18. Show roof drain piping from each building connected to the stormwater management system.



19. Provide drains between the bottom of the retaining walls and Duplex #1 and Duplex #2.
20. Show foundation drain discharge pipe locations for each building.
21. Show limit of disturbance.
22. Will the existing driveway encroachment onto 72 Reservoir Street from 74 Reservoir Street be removed? If not, a vehicle barrier should be placed west of the rock cut at this location.
23. All proposed retaining walls, stormwater drainage piping and drainage structures (except for the outlet pipe P7 and MH C) should be located on the property of 72 Reservoir Street and not within the town's right-of-way unless an easement is acquired for these facilities from the town by the property owner.
24. Note 3 on Sheet 6 of 6 on the site plans should reference the current *2024 Connecticut Guidelines for Erosion and Sediment Control*, which supersedes the *2002 Connecticut Guidelines for Erosion and Sediment Control*.
25. The drainage report calls for a row of 4 Stormtech SC-800s to be used for the isolator row. The plan calls for Cultec R-330 XLHD units, with a row of 5 for the isolator row. Provide revisions to address this discrepancy.
26. The stormwater management system outlet control is modeled incorrectly. The 12" HDPE pipe out of the structure must be included and designated as the primary outlet, while the 2" and 4" orifices must be set to route through the 12" HDPE, since they are not separate outlets of the system.
27. Provide pre-development and post development watershed maps and time of concentration pathways.
28. Revise the pre and post-development hydrographs to be computed based on the NOAA_D storm distribution. According to the *2024 Connecticut Stormwater Quality Manual*, "The NOAA_D rainfall distribution replaces the NRCS Type III distribution, which has historically been used in Connecticut and other Atlantic coastal areas, as well as the Northeast Regional Climate Center (NRCC) regional rainfall distributions developed in 2015."
29. The proposed impervious driveways should be included in the stormwater calculations. These driveway areas total approximately 3,785 square feet and their impact to stormwater runoff rates need to be analyzed.
30. The proposed open bottom underground stormwater detention structures are located within 2 feet of a crawl space and basement. According Table 10-3 of the *2024 Connecticut Stormwater Quality Manual*, stormwater systems that allow for infiltration should be located a minimum of 10 feet of building foundations



- (basement or slab). The design should also consider whether stormwater infiltration from the system could adversely impact the foundation.
31. Silt fence should not be used within the town's right-of-way in order to minimize the potential for sight line impacts at the intersection of Reservoir Street and Knollwood Drive.
 32. Silt sack erosion control devices with integrated high flow bypass should be installed and maintained within town catch basins (CB #1, CB #2 and CB #3) throughout construction.
 33. Separate gravel construction entrances along Knollwood Drive should be installed for the driveway to each building once rough grade is established.
 34. Provide a design detail showing how much loam fill and topsoil will be replaced over top of the excavated ledge areas to restore the hydrologic soil group (HSG) classification of these areas to HSG C soils as proposed in the stormwater analysis.
 35. Provide a plan for proposed planting and landscaping.

It is SLR's opinion that the above site plan review comments include significant concerns related to the proposed site design. The Commission should require the Applicant to sufficiently address these concerns prior to approval of the application by the Commission.

If you should have any questions, please feel free to contact me directly.

Regards,

SLR International Corporation



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