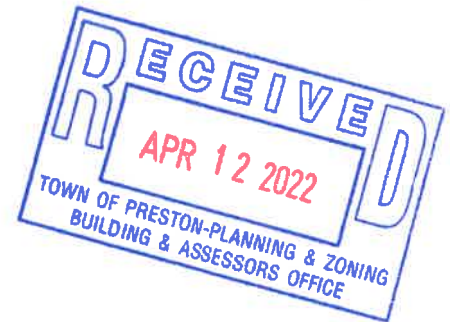




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April 7, 2022

Ms. Kathy B. Warzecha
Town Planner
Town of Preston
389 Route 2
Preston, CT 06365



RE: Blue Water RV Park Proposal

Dear Ms. Warzecha:

Following please find our responses, in *italics*, to your comments dated March 30, 2002

1. Flood Impact Study

- a) A registered professional engineer should determine the BFE in accordance with accepted hydrologic and hydraulic engineering practices and document the technical methods used. Studies, analysis, and computations should be submitted in sufficient detail to allow thorough review. FEMA developed a guide to assist in determining the BFE, the link is as follows:
https://www.fema.gov/sites/default/files/documents/fema_approx-zone-a-guide.pdf

Response – A base flood elevation analysis has been performed and is attached to this response letter. The issue of compliance with the requirements of the municipal flood hazard regulations has been reviewed by and determined in compliance by the Town Engineer.

- b) The flood impact statement is vague and needs clarification. Based on the sketch provided, it appears that the two cut areas are within the current flood hazard area. Please verify that this addresses compensatory storage even though the compensatory storage is provided in the floodplain. Also, ground water levels should be investigated in the area of the excavation and noted in the flood impact study. Highlight the compensatory storage location on your map.

*Response – the flood impact analysis methodology was reviewed with the town's consultant engineer prior to the analysis and done in accordance with pre-design discussions with him. It was reviewed by, and accepted by, the town's consultant engineer. Compensatory storage is always placed in the floodplain. Our engineers at Benesch, with over 100 years' experience, have never not placed compensatory storage in a floodplain. The town's consultant engineer, with over 40 years' experience, has never not placed compensatory storage in the floodplain. Compensatory storage would not be allowed to be placed in a **floodway**, without performing an equal conveyance analysis, but there are no floodways on this property so that is not applicable. A **floodway** is not the same thing as a floodplain. Regarding groundwater, the compensatory storage areas were designed with full coordination with the soil scientist, Mr. Logan and this design was reviewed and approved by both the town consultant engineer and the town consultant soil scientist, Mr. Theroux. As requested in your comment, it is my professional engineering opinion that this design addresses regulatory compensatory storage requirements.*

The newly created wetlands areas were designed specifically to address compensatory storage requirements. However, those areas were not analyzed in a vacuum. A surface-to-surface comparison (existing vs. proposed) within the floodplain was performed to ensure compensatory storage requirements are met. The two (2) areas of created wetlands are highlighted on the plan. A colored depiction has been included in the base flood elevation analysis attached to this response letter.

- c) During the times of a flood event, it may be necessary to have a temporary storage area for the RVs that are located in the flood area or prohibit camping within the flood zone. I can't imagine that anyone would want to be camping in a flooded area.

Response – Our analysis indicates the 100-Year BFE is approximately elevation 118.8. The elevations of the proposed roadway and RV pads within the BFE range between 118.5 – 118.9, therefore in a 100-year flood event water would pond up to six inches above the ground, which is well below a floor elevation of an RV in that area. That being said, it is highly unlikely that anyone will be camping anywhere during a 100-year storm. These storms do not sneak up on us and campers would know days in advance if one was anticipated. During a 100-year storm event there would be ample other empty RV pads on the site where these RVs could be moved to.

2. Viewshed. Please illustrate what will be seen from the residents on Lynn Drive. It is noted that there is a 100-foot buffer along the pond, and the vegetation will remain. The project most likely will not be visible from the Lynn Drive properties during the summer months. Please illustrate this, if possible. Also, planting some evergreens will eliminate the visibility during the winter months of the structures on the site. This will be of particular importance for the properties on the south side of Lynn Drive due to their proximity to the site.

Response – viewsheds have been added and can be seen on Sheet C-2.6.

3. Please show trash receptacles in the area of the welcome center.

Response – trash receptacles have been added and can be seen on Sheet C-2.1. For rodent and insect control, please see the operational plan prepared by REMA Ecological Services, LLC.

4. Please provide the cost estimate for the construction of the entire project and update the Erosion and Sediment Control plan, including funds for reclamation in the event the project is not completed.

Response – the erosion control estimate has been updated and is attached to this response letter. The overall anticipated construction cost is \$20M - \$25M.

5. Please add the density standards to the zoning chart.

Response – the zoning chart on Sheet C-2.0 shows the maximum density allowed per zoning (5 sites/acre) as well as the proposed density (4.28 sites/acre.)

6. There is a note on the plan that indicates “caretakers will be on the site year-round,” please clarify that caretakers will not live on the grounds (unless they will).

Response – The note has been revised to indicate such.

7. There is a note on the plan that kayak and canoe storage will be in the maintenance building. How will the kayaks and canoes access the pond? Or remove the not if there will be no canoes or kayaks.

Response – the note has been removed.

8. Why isn't fencing being provided around the playground, bocci courts, or the volleyball court? At the least, it should be provided around the playground.

Response – the location of the bocce courts and the playground have been flipped and fencing has been revised to enclose the playground. This can be seen on Sheet C-2.1.

9. Do you think it is necessary to install short, separator fence (with reflectors) along the rubble wall? Like a split-rail fence. The drive is so close to the slope—or a 4-foot high, green-coated chain-link (maybe with a gate)—that could be provided along the 100-foot buffer of the pond which could be used for safety in addition to the protection of the 100-foot buffer area. A sign could be added to the fence that indicated that the area is a conservation zone. This will keep patrons from walking within this sensitive buffer area and keep any debris out of the area. The 100-foot buffer area should remain in its natural condition, except for the planting of evergreens and including keeping undergrowth and falling trees for wildlife.

Response – a timber fence will be placed between the top of the wall and the drive aisle with conservation area markers attached at 100 foot intervals. The rail can be seen on Sheet C-2.1 and the detail can be seen on Sheet C-6.4.

10. Can you show the planting of the trees within the grading of the berm slope? The slope is so steep, will the trees grow properly? Provide a detail on how the trees will be planted. What type of ground cover will be used on the berm slope?

Response – the berm slope is designed with a 2:1 side slope, which is well within industry acceptable gradients to plant trees. The groundcover will be typical grass.

11. Please note on the plan that the emergency access shown on the east side of the site requires approval by OSTA and will only be installed if approved by OSTA.

Response – A note is placed on Sheet C-2.2 stating such.

12. There is a note on the plan that no camper shall be able to occupy any camp or tent site for more than 90 days. Why?

Response – this is a requirement of the zoning regulations, specifically Section 10.4.11 and it applies only to campgrounds in the RC district. The note has been revised to state such. The note has been revised to indicate that this requirement is not applicable to sites in the R-60 Zoning District.

13. Thank you for providing the letter read into the record regarding the water supply.

Response – you are welcome.

14. Please note on the plan that Blue Water Development will work with the Tribe's Historical Preservation Officer and State Archaeologist.

Response – In response to the correspondence from the State office of Archeology dated March 10, 2022, it should be noted that the development initiative has removed all activity from the 100-foot periphery of Avery Pond, including the northwesterly peninsula, which areas are identified by the State Archaeologist as the areas of greatest sensitivity. A vast majority of the remainder of the site has historically been

disturbed by agricultural activity. Bluewater has already engaged with the Tribal Historic Preservation Officer and sensitive locations, as identified by him, have been protected from disturbance by conservation area designation. In the event that identified historic resources are encountered during construction, the applicant will contact the State Office of Archeology for assistance in identifying and preserving such resources. Note 20 on C-2.0 has been added to reflect this requirement.

15. Is there a possibility that the check-in time for campers can be coordinated with the school so there are no conflicts with the bus schedule? The last bus leaves at about 3:15 p.m. – so it is recommended that the check-in time during the school year be after 3:30 p.m. or between 10:00 a.m. to 12:00 p.m.

Response – Blue Water's published check in time for campgrounds are between 3 pm and 4 pm. During shoulder season (the months of April/May and early June and September/October), the majority of check in times occur between 4 pm and 7 pm Thursday and Friday, which occur after school hours.

16. A loading space should be added and could be used temporarily during the times that loading will occur in the morning. Just place a no RV can park during loading times.

Response – there is ample space on bituminous pavement adjacent to the maintenance building that will be utilized for drop off of products during loading times. The number of drops is typically once or twice per month.

17. Please provide a rodent/insect control plan. I will be asking the CT DEEP to review the plan to ensure there will be no adverse environmental impact.

Response – A rodent/insect control plan is being prepared by REMA Ecological Services, LLC and will be provided prior to the next public hearing.

18. Please provide an E&S control report to the town planner/ZEO monthly and after major storm events during the construction. Also, the plan provides a schedule for maintenance of the stormwater system. If the application is approved, it will be required that an annual maintenance report, outlining compliance with the maintenance schedule, be included with the renewal permit application. This would be a condition of approval.

Response – note 21 has been added to Sheet C-1.0 stating such.

19. Please provide photos of the safari tents, floor plan, and details of their installation. What is the durability during storm events or at times of intense windstorms? Also, the tents are in areas of very steep slopes, how will that work?

Response – safari tent details are shown on Sheet C-6.6. The decks are supported by posts on the back slope. These details are typical of many of Bluewater camp sites, and they are designed to meet all applicable codes.

20. Where will the temporary walkway over the wetlands and the dewatering straw basins be used?

Response – the temporary walkway and dewatering basin details have been removed.

21. Where is the minimum 40 feet to the rear yard?

Response – The zoning table contained the wrong rear yard setback “provided” and has been corrected on Sheet C-2.0.

22. The RV campsites extend into the roadway – please revise the road line.

Response – The regulations require minimum dimensions of 25' x 60' and minimum 1,500 square feet. Each of the spaces provides those minimum dimensions and area. The sides of some of the spaces are configured in a parallelogram and not a rectangle. The shaded rectangle shown on each space is simply indicative of a rectangular 25' x 60' space would look like and, in some cases, that rectangle extends into the roadway. But the actual dimensions of the spaces do not extend into the roadway.

23. Please note on the plan that the town may require verification on locations by a land surveyor of items during the construction, as necessary.

Response – note 19 on Sheet C-2.0 has been added to state this.

24. Where is the bike rack located?

Response – the bike racks are at the welcome center and the location has been added to Sheet C-2.1.

25. Change dates in the E&S control plan.

Response – the construction dates are anticipated and have been noted as such. If all land use approvals are granted this summer, we expect construction to begin this fall.

26. A preconstruction meeting will be conducted with the town staff. Please notify the town planner to schedule the meeting, and she will coordinate with the various town staff. All contact information will be provided at the meeting, including an emergency contact for after hours.

Response – this is required by notes 15 and 17 on Sheet C-1.0.

27. Note 20 on page C-10, please coordinate the traffic control with the resident state trooper prior to the start of construction to ensure that he is satisfied with any of the traffic control. I will be providing additional comments regarding the traffic plan.

Response – note 19 has been revised on Sheet C-1.0 to state such.

28. Please provide information regarding impact on Route 2A (Route 12) traffic.

Response – When determining what intersections to study for analysis, the guidelines used by the OSTA for determining which intersections should be studied are the site access drives and any other intersections where approximately 100 or more new trips during the peak hour are being added, or 50 or more new trips during the peak hour period to an individual intersection left turn movement.

The increase in number of vehicles along Route 2 west of Route 164 including the intersection of Route 2 and Route 2A are 13 vehicles in the weekday morning peak hour, 14 vehicles during the weekday afternoon peak hour and 14 vehicles during the Saturday Afternoon peak hour. The resort traffic will account for only 1.3%, 0.7% and 0.9% of the traffic along Route 2 north of Route 164 during each peak period, respectively. It is our professional opinion that intersections along Route 2 west of Route 164, including

the intersection with Route 2A, will not be adversely affected by the Bluewater development and do not warrant study based upon industry provided protocol.

Please note, that when using the ITE Trip Generation information, the data is based on real world studies done at similar facilities that match a particular land use. Therefore, using the ITE formulas for Land Use 416, "Campground / Recreational Park", the trip generation information accounts for all vehicles that enter or leave the site. This not only includes RVs, but also guests traveling to and from other destinations, employees, delivery vehicles, maintenance vehicles, etc.

29. Please provide a list of activities that will be planned for the park, including types of activities that will occur on weekends. Will there be evening movies? If so, what will the impact be on the neighbors of any amplifications.

Response – a typical list of activities has been attached to this response letter. There are no proposed outdoor activities that require amplification.

30. Please list any hazardous material that will be stored on the site. Provide a detailed procedure for cleaning and remediating any hazardous material or fuel and oil spills.

Response – cleaning products, pool products and fuel for lawn equipment will be stored indoors in the maintenance building and will consist of approximately 20 gallons or less. A spill kit will be kept inside the maintenance building and will be utilized if a spill occurs. There will be no floor drains in the maintenance building. These products and volumes are not dissimilar to those found at a single family home with a swimming pool.

31. There are several brands of smokeless fire pits, and that appears to be a solution to the issue of smoke emissions. Please note on the plan that only smokeless fire pits will be used within the park. Also, that no out-of-state wood will be used.

Response – Blue Water is committing to utilizing smokeless fire pits. They have not decided which brand to use, as they are researching different products, but they have committed to smokeless fire pits. This, as well as a requirement for no out-of-state wood, is now stated in note 21 on Sheet C-2.0.

32. In the area of the safari tents, note the width of the drive. One of the drives must be a minimum of 10-foot wide for ambulance access. Please identify on the plan.

Response – the minimum drive aisle will be 10 feet and this dimension is shown on Sheet C-2.4.

33. An exhibit has been submitted by Jerry Grabarek regarding the PFAS and PFOS present on the site. Thank you for providing a copy of the report. I will be sending it to CT DEEP to review the information.

Response – you are welcome.

34. Provide numbers on the campsites and provide a detail of how they will be identified in the field. A numbered map will be provided to the Fire Chief and Trooper, if approved.

Response – Each campsite will have its own numbered designation. This is shown on the Sheet C-2 series and the detail has been placed on Sheet C-6.0. A numbered map will be provided to the Fire Chief and Resident Trooper, if the project is approved.



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April 2, 2022

Ms. Kathy B. Warzecha
Town Planner
Town of Preston
389 Route 2
Preston, CT 06365

RE: Base Flood Elevation Analysis
Preston RV Park

Dear Ms. Warzecha:

As requested in your March 30, 2002, comment letter, we have determined the base flood elevation (BFE), utilizing the document "Managing Floodplain Development in Approximate Zone A Areas – A Guide for Operating and Developing Base (100-Year) Flood Elevations, April 1995, by the Federal Emergency Management Agency (FEMA)."

Following is our application of the Contour Interpolation Method, as detailed in the above document:

Step 1 – Obtain a topographic map showing the site being analyzed.

Benesch performed an A2/T2 boundary survey with 1-foot contours.

Step 2 – Reduce or enlarge the FIRM or topographic map as necessary so that the two are at the same scale.

See description under Step 3 below.

Step 3 – Superimpose the approximate Zone A (100-Year) floodplain boundary from the FIRM onto the topographic map.

As part of the February 4, 2022, revision set submitted to the wetlands commission, the FEMA 100-year base flood line was superimposed onto the survey and shown on the plan set.

Step 4 – Determine if this method is within the acceptable accuracy limits. The floodplain boundary must generally conform with the contour lines along the flooding source in question. The difference between the water-surface elevations determined on the right overbank and the left overbank must be within one-half of the map contour interval. For lacustrine flooding sources, the difference between the highest and lowest determined water-surface elevations around the flooding source must be within one-half of the map and contour interval. Otherwise, this method is not acceptable.

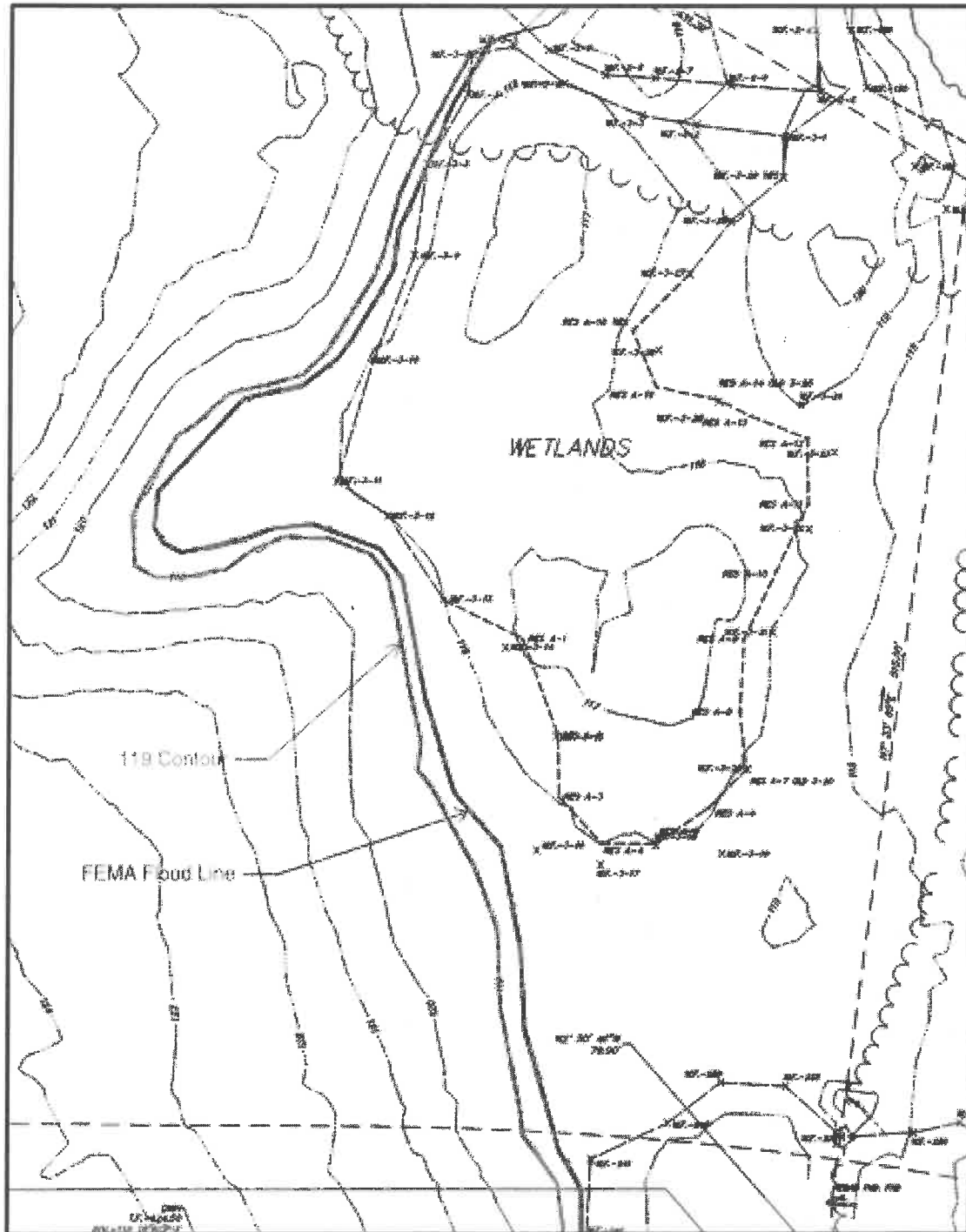
The floodplain line for the right overbank of Indiantown Brook lines up almost exactly parallel to the 119 contour and indicates a BFE of elevation 118.8. We do not have contour data on the left overbank as that is located on the adjacent property, and we did not perform topographical survey on the adjacent property. Given that near parallel nature of the FEMA BFE line and the 119 contour, it is our professional opinion that this method is acceptable.

Step 5 – If the method is acceptable, then determine the BFE.

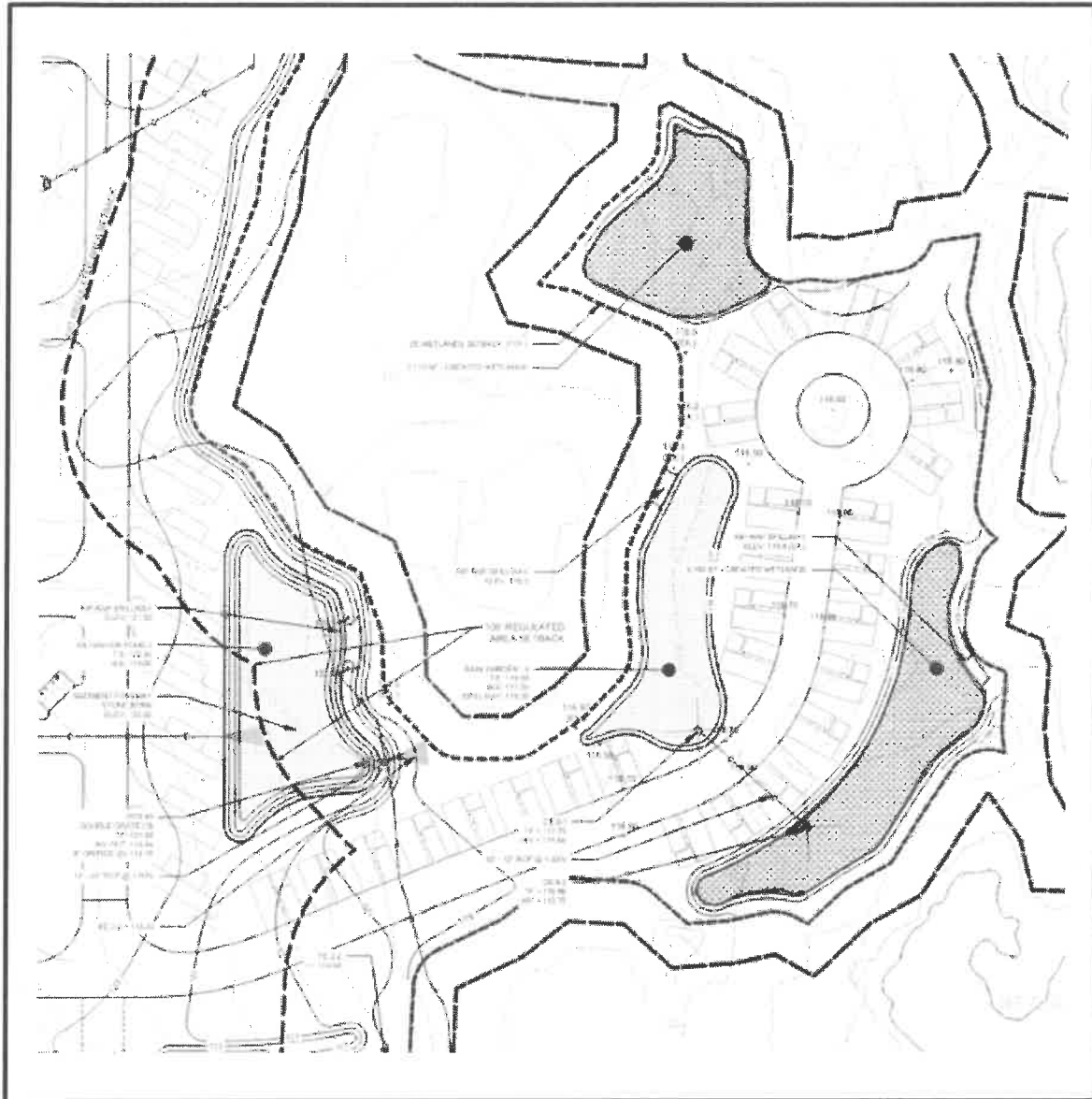
By interpolating between the parallel 119 contour and the FEMA BFE line, it is our professional opinion that the approximate BFE in this area is elevation 118.8.

Following are graphics depicting the comparison of the 119 contour and the FEMA flood line, as well as the areas of compensatory storage.

Comparison of 119 Contour and FEMA Flood Line



Compensatory Storage Areas



If you have any questions about this information, please call or e-mail me at 860-494-4359 or wwalter@benesch.com.

Sincerely,
Alfred Benesch & Company



Will Walter, PE
Senior Project Manager

Bluewater - Preston RV Park

EROSION CONTROL & RESTORATION COST ESTIMATE

Project: Preston RV Park
Project #: 70486.02
Project #:
Location: Route 2
Preston, CT

Computed By: WGW
Checked By:
Date: 11/04/21
Revised: 04/07/22
Revised:

MAJOR ITEMS

Item Description	Units	Quantity	Unit Price	Cost
Division 1 - General Requirements				
Silt Fence	l.f.	11,200	\$6	\$67,200
Filter Inserts	ea.	50	\$200	\$10,000
Temporary Stockpile Management	l.s.	1	\$18,000	\$18,000
Temporary Sediment Trap Construction	ea.	10	\$5,000	\$50,000
Temporary Diversion Swales/Water Bars	l.f.	3,600	\$3	\$10,800
Construction Entrance	ea.	2	\$2,500	\$5,000
Erosion Control Repairs	l.s.	1	\$45,000	\$45,000
Seeding	ac.	34	\$7,500	\$255,000
TOTAL:				\$461,000

Legend

s.y. = Square Yard ea. = Each
c.y. = Cubic Yard l.f. = Linear Foot
s.f. = Square Foot l.s. = Lump Sum

Sample Weekend Schedule for Foxwoods

Saturday

Time	Activity	Location
9 am	Tennis Court Open Play	Tennis Courts
3pm	Kids Club (enjoy arts & craft, outdoor games, and more!)	Welcome Center
6pm	Kids Karaoke (ages 17 and younger)	Welcome Center
7pm	Candy Bar Bingo (bring a candy bar in exchange for 1 bingo card and see how takes home the jackpot!)	Welcome Center

Sunday

Time	Activity	Location
9 am	Scavenger Hunt Find as many items as you can and win a prize!	Welcome Center
12 pm	Kids Club (enjoy arts & craft, outdoor games, and more!)	Welcome Center
3pm	Sunday Funday (pick up a bag of games to play with family and friends)	Playground
7pm	Family Paint Night (wine glasses, ceramics, canvases)	Welcome Center