



Connecticut Department of Housing
505 Hudson Street
Hartford, CT 06106
Attn: Evonne M. Klein, Commissioner

RE: **Application Insufficiency**
FMC/FME-201401124
Washington Village
Norwalk, CT

Dear Ms. Klein:

The department has reviewed the above referenced application and has identified the following insufficiencies:

1. Plans must be signed and sealed by a Professional Engineer registered in the state of Connecticut.
2. The elevation datum must be specified on the plan sheets.
3. The plans must show the existing condition of the site at all locations of proposed activity. The current plans do not clearly show the existing conditions.
4. Plans are required showing the building elevations including the pedestrian bridge between the buildings, all service facilities including electrical, heating and elevator systems.
5. The current application includes narrative on raising the profile of Raymond and Day Street such that the elevation of the intersection is above the 100-year flood event and construction of a walkway in Ryan Park above the 100-year flood elevation both to provide dry egress from the proposed buildings. Plans are required showing the proposed roadway work at Day Street and Raymond Street and the Ryan Park walkway. The plans must clearly demonstrate the raising of the roadway and walkway to the base flood elevation and the limits of the proposed work. If there are any modifications to the stormwater drainage systems that work must also be shown with any supporting calculations.

6. The soil stockpile areas shown on the plan sheets must include floodproofing to the 100-year flood elevation. Section 25-68h-2(d)(1) of the Regulations for Connecticut State Agencies (RCSA) prohibit the storage of any materials that could be injurious to human, animal or plant life below the elevation of the base flood for a critical activity (i.e. the 500-yr base flood elevation). The applicant shall confirm that no such materials—including fuels, maintenance fluids, or hazardous waste—will be stored below the 500-yr elevation during construction activities, and that any such materials will be elevated to above the 500-yr BFE or shall be removed to an upland location at the end of each day. The information must be documented on the plan sheets.
7. Documentation is required showing that the soils support proposed infiltration for the proposed infiltration galleries and stormwater BMP's.
8. Documentation is required from the city that they are accepting stormwater from the development into the city system.
9. Documentation is required showing that there is safe egress from all proposed buildings located within the flood hazard zone. Your documentation may include a detailed Emergency Operations Plan and Flood Contingency Plan, which assures the safe evacuation of all residence from their homes. If dry access is proposed, the access route including elevation must be shown on the plans included in this application.
10. As part of the Flood Contingency Plan the applicant must show the flood warning capabilities.

The items identified above must be received by the department within thirty days of the date of this letter. If all of the items listed above are not submitted within the timeframe identified your application will be rejected in accordance with section 22a-3a-2(e) of the Regulations of Connecticut State Agencies.

In addition the following issues have been identified in your application:

1. When an exemption is requested, the applicant (Department of Housing) must clearly demonstrate that the activity or critical activity within the floodplain “(1) is in the public interest, (2) will not injure persons or damage property in the area of such activity or critical activity, (3) complies with the provisions of the National Flood Insurance Program, and (4) in the case of a loan or grant, the recipient of the loan or grant has been informed that increased flood insurance premiums may result from the activity or critical activity.” Most importantly, the Department of Housing must provide sufficient documentation to demonstrate that the proposal will not injure persons by placing residential housing in the floodplain. Because this office has concerns with placing residential structures in a floodprone area and that the exemption process provides the public with an opportunity for a hearing where such demonstration would be scrutinized, it is imperative that your agency provides all documentation required to make conclusions that siting of residential structures within a floodplain, where no dry access currently is available will in no way injure persons.

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If you have questions regarding the application, you may contact Sharon Yurasevecz at 860-424-3861, or sharon.yurasevecz@ct.gov. All correspondence regarding the application should reference the application number identified above and be addressed to Sharon Yurasevecz, Inland Water Resources Division, Bureau of Water Protection and Land Reuse, Department of Energy and Environmental Protection, 79 Elm St., Hartford, CT 06106-5127.

4/24/14

DATE



Cheryl A. Chase, Director
Inland Water Resources Division

CAC/SKY