SLR International Corporation
99 Realty Drive, Cheshire, Connecticut, 06410

September 9, 2025

Dr. Michael Klemens, Chairman
Planning & Zoning Commission
Town of Salisbury
27 Main Street
P.O. Box 548
Salisbury, CT 06068

SLR Project No.: 141.22100.00001

RE: Responses to Uploaded Documents (September 9, 2025) Responses to Miller, REMA, and Allyn
PZC Application #2025-0287
Wake Robin Inn Redevelopment
104 & 106 Sharon Road
Salisbury, Connecticut

Dear Dr. Klemens and Members of the Commission:

SLR International Corporation (SLR) is in receipt of correspondence uploaded earlier today, September 9, 2025, from the public regarding the above-referenced application. We apologize for the repetitiveness of our responses provided, however for the purposes of the completeness of this application's record, SLR offers responses to the following public comments.

Miller Planning Group Additional Comments:

Miller Comment A (excerpt from letter):

…This development would change a low-intensity "grandfathered" use into a large commercial enterprise within a rural residential neighborhood within the RR-1 zone. The proposed development would be much larger and more intensive than the current use in many ways…

SLR Response to Miller Comment A:

The Planning & Zoning Commission, when it adopted a regulation to permit hotels, contemplated the introduction of a non-residential use in the RR-1 zone. The Commission set regulatory requirements, approvable via a Special Permit, that are achieved by this application. Although the applicant, recognizing neighbors' concerns, has self-imposed restrictions for number, size, and timing of events, in actuality, the number and size of events is immaterial since that same number, or much greater, are allowed as of right to occur on the property now. It is also important to note that this non-residential use has been in use and operational for decades upon decades.

Miller Comment B (excerpt from letter):

…The 2025 application is only slightly smaller than the 2024 application and would have the same impact on the neighborhood…

SLR Response to Miller Comment B:

The current application is not only smaller than the 2024 application as stated by Mr. Miller, it emphasizes how the applicant also listened to the Commissions' comments and made significant changes to the:

- Location of the event space, essentially tucking it into the hillside (like a bunker), behind the proposed Inn extension
- Location and number of the proposed cottages, essentially creating a residential feel and character along Wells Hill Road with the proposal of only two cottages

Miller Comment C (excerpt from letter):

… The issues addressed in the McDermott report included terminology, the location of information, and, of course, differences in our perspectives. Again, I offer the following comments…

SLR Response to Miller Comment C:

Mr. Miller re-explains in his comment letter that, "McDermott's response was very similar to his response last year, which is understandable, as my report had not changed much either." SLR concurs that most, if not all, of the information in Mr. Miller's current letter is the same discussion that he has made in previous letters and does not want to waste the Commissions' time in re-responding to the same comments. We would like to highlight several comments made by Mr. Miller in his letter and they are the following:

- **"He (Mr. McDermott) commented that I did not use specific data in my report. I acknowledge that I am not an expert in noise, lighting, engineering, or soil science."**
- **"A significant section of the McDermott report addressed terminology that I used, such as "mixed-use," "spot zoning," and "commercial center," to the extent that he quoted definitions from professional resources. I concede that the terms used do not conform to some definitions found within some professional sources."**
- **"It is up to the applicant to provide all the information necessary."**

SLR and the applicant team of professional experts provided the required data, detailed analysis, and additionally requested information. This information analysis and data was all supported by the Town's own third-party reviewing consultants.

Miller Comment D (excerpt from letter):

…I discussed affordable housing, as I am aware it is an issue in Salisbury. The Commission bears the responsibility for the consideration of the range of potential impacts of a development,

which was my purpose for inclusion. I now regret bringing it up, as it is being used in a threatening tactic, which is a poor example of planning and decision-making…

SLR Response to Miller Comment D:

Consideration of feasible and prudent alternatives were discussed during the public hearing process and are a very good example of how planning and decision making should occur. It is noted that the applicant, and Mr. Miller, were specifically asked by the Commission to elaborate and provide more discussion and opinion as to the feasibility of affordable housing on the property.

Miller Comment E (excerpt from letter):

…The MacDermot report challenged my analysis of the sanitary sewer situation. Last year, concerns were expressed that the entire system might be at or near capacity for other planned priority projects. McDermott responded that he "assumed" that the issue was settled. Perhaps it was, and I was just unaware…

SLR Response to Miller Comment E:

The official Town of Salisbury Water Pollution Control Authority (WPCA) approval for this proposed project was part of the application information submitted and was stated on the record several times.

SLR Response to REMA Letter:

It should be noted that the REMA letter was dated September 4, 2025, however it was not submitted to the Town for upload until September 9, 2025, limiting the time for the applicant to review. Fortunately, similar to the Miller letter discussed herein, the REMA letter also reiterates most, if not all, of the same comments previously addressed by the applicant. As stated numerous times on the record through written documentation, calculations, reports, field testing, professional testimony from professional engineers, and the Town's third-party professional engineering reviews and signoffs, the applicant meets and exceeds the protection of stormwater quality, storm water management, and erosion and sedimentation controls per the guidelines and recommendations of the State of Connecticut.

As stated at the last public hearing, the project stormwater design engineer, Todd Ritchie, is a licensed professional civil engineer in the State of Connecticut. Mr. Ritchie is also a licensed professional civil engineer in 7 other U.S. states and has the following national credentials:

- **Certified Professional in Stormwater Quality (CPSWQ)**
- **Certified Professional in Municipal Stormwater Management (CPMSM)**
- **Certified Professional in Erosion and Sediment Control (CPESC)**
- **Certified Erosion, Sediment and Stormwater Inspector (CESSWI)**
- **Board Certified Environmental Engineer (BCEE)**
- **Certified Floodplain Manager (CFM)**

- **Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS)**
- **Leadership in Energy and Environmental Design Accredited Professional (LEED AP)**
- **Envision Sustainability Professional (ENV SP)**

REMA additional Comments: (excerpt from letter)

"We should also point out that in calculating their unrealistic percentages of stormwater pollutant removals they used "BMP Performance Curves for Soil Infiltration Rate: Infiltration Trench" from a report prepared by Tetratech for the US EPA (Region 1), entitled "Stormwater Best Management Practices (BMP) Performance Analysis," dated March 2010. We note that they should at least have used the tables and graphs for "infiltration basins" included in that report."

SLR Response to additional REMA Comments:

SLR chose to use the most conservative performance curves that most accurately represent the stone bottoms of the infiltration basins. The stone bottoms of the infiltration are in fact comparable in functionality to stone-filled infiltration trenches.

With regards to the continued comments from REMA regarding a lack of Connecticut Department of Energy & Environmental Protection (CTDEEP) Natural Diversity Database (NDDB) coordination, regarding the relocation plan for the *Carex oligocarpa.* It has been stated on the record that the applicant has been in constant coordination with the CTDEEP State Botanist and that they have accepted the SLR Botanists report, accepted the preliminary relocation plan and are just finalizing the language for the 'Deed Restriction' with the CTDEEP staff. CTDEEP has reviewed all listed species survey materials for this project site and do not require any additional species survey efforts.

With regards to REMAs continued discussion on the northern long-eared bat (NLEB), and as stated by SLR professionals on the record and in writing, SLR has completed the United States Fish and Wildlife Information Planning and Consultation determination key and has received concurrence that the project <u>may affect - not likely to adversely affect</u> (NLAA) for NLEB. The determination key requires that a time of year restriction be implemented to protect the NLEB. The TOY language shall include <u>"no drilling/blasting or tree cutting/trimming between June 1 and August 15".</u> No additional coordination efforts for the NLEB are anticipated. The applicant will implement the TOY restriction and will add a note to the construction plans upon approval by the Planning & Zoning Commission.

Allyn Letter Comments (excerpt from letter):

…At the request of Salisbury resident Kerry Noble, and echoing concerns of the Salisbury Conservation Commission and other interested parties within your town, I write to you concerning Japanese Knotweed infestation at your Municipal Sewer Treatment Facility on Walton Street as it relates to any possible expansion or alteration due to the Wake Robin Inn proposal…

SLR Response to Allyn Letter:

The project received formal WPCA approval based upon existing and proposed adequacy of the current wastewater system. No improvements are required or proposed

to the wastewater treatment plant or facility as part of the Wake Robin Inn Redevelopment project.

Please feel free to contact us at (203) 271-1773 if you need additional information regarding the above responses.

Regards,

SLR International Corporation

Mark Arigoni, PLA
US Sector Leader – Built Environment
marigoni@slrconsulting.com

Vincent C. McDermott, FASLA, AICP
Senior Principal Landscape Architect
vmcdermott@slrconsulting.com

Todd Ritchie, PE, BCEE, CFM, REHS/RS
Principal Civil Engineer
tritchie@slrconsulting.com

Matthew J. Sanford, MS, PWS, RRS
US Manager of Ecology
msanford@slrconsulting.com

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