

INLAND WETLANDS PERMIT APPLICATION FOR REGULATED ACTIVITIES

APPLICANTS:

COSTCO WHOLESALE CORPORATION
ORCHARD HILL PARTNERS, LLC

RECEIVED

SEP 09 2015

PROJECT NARRATIVE

Inland Wetlands Agency

This is an application by Costco Wholesale Corporation and Orchard Hill Partners, LLC, for an inland wetlands permit to conduct regulated activities. Two other applications for inland wetlands permits to conduct regulated activities on adjacent properties are being submitted simultaneously by 595 Corporate Circle (the "595 Application") and Peter G. Mandragouras, Trustee (the "Trustee Application"). The applicants' intent is that the three applications be reviewed concurrently.

Background

On July 9, 2015, the Branford Planning & Zoning Commission approved an application by Costco Wholesale Corporation, 595 Corporate Circle, and Orchard Hill Partners, LLC to rezone approximately 44 acres of land from IG-2 to Planned Development District (PDD). The PDD area is located between East Main Street (Route 1), East Industrial Road, and Leetes Island Road, north of the Interstate 95 Exit 56 southbound entrance and exit ramps. The PDD is depicted on Sheet EX-1 of the Application materials.

As described by the applicants during the proceedings on the PDD application, the first phase of development within the PDD is anticipated to be the development by Costco Wholesale of a new discount club with an accessory gasoline fueling facility on the Cooke Parcel and a small portion of the 595 Corporate Circle Parcel. As part of this phase of development, an access drive would be built from East Industrial Road, located at the I-95 Exit 56 southbound entrance and exit ramps, north to East Main Street (the "Access Drive"). A portion of the Access Drive would be located on a new parcel to be created from land now currently part of the Connecticut Shellfish Parcel and the Trustee Parcel. Also included in this phase of development is the construction of a connector driveway from the Access Drive to the west, intersecting with East Industrial Road.

Later phases of development within the PDD would include construction of other uses allowed within the PDD on the property owned by 595 Corporate Circle (the "595 Property") and the property owned by Peter G. Mandragouras, Trustee (the "Trustee Property"). This Application, together with the 595 Application and the Trustee Application, includes all of the land within the approved PDD, other than the parcel owned by AHB, LLC, on which no construction activity is proposed. It is the applicants' intent that all three applications be reviewed concurrently.

Land Involved in this Application

The land involved in this Application (collectively referred to as the “Property”) includes all or a portion of the following four parcels:

1. *573 East Main Street (Map J4, Block 2, Lot 1) (entire parcel)*: this parcel is owned by NF + W Cooke Limited Partnership and the Cooke/Harrison Family Partnership and is approximately 22.36 acres in size (the “Cooke Property”). The Cooke Parcel has street frontage on East Main Street. The Cooke Parcel has historically been farmed.
2. *569 East Main Street (Map H4/J4, Block 2, Lot 1.3) (portion of this parcel)*: this parcel is owned by 595 Corporate Circle and is approximately 16.56 acres in size. The 595 Property has street frontage on East Main Street, Leetes Island Road, and East Industrial Road, and is currently vacant.
3. *20 East Industrial Road (Map J5, Block 1, Lot 6) (portion of this parcel)*: this parcel is owned by Peter G. Mandragouras, Trustee of the CVP Trust, has direct street frontage on East Industrial Road, and is approximately 1.73 acres in size. The Trustee Property is currently vacant.
4. *26 East Industrial Road (Map J5, Block 1, Lot 7) (portion of this parcel)*: this parcel is owned by Connecticut Shellfish Company, has direct street frontage on East Industrial Road and is 2.41 acres in size (the “Connecticut Shellfish Property”). The Connecticut Shellfish Property is currently developed with a wholesale shellfish processing facility, including a building, truck loading areas, parking, and related improvements with direct access and a curb cut onto East Industrial Road.

Overall Summary of Development Included in this Application

The overall scope of development included in this Application is as follows:

1. A building of approximately 158,000 square feet in size housing a discount club intended to be occupied by Costco Wholesale is proposed on the Cooke Property. A gasoline fueling station associated with the discount club and for the benefit of discount club members (not to include facilities to serve large trucks), would also be developed. The fueling station canopy and operator booth would be approximately 4,000 square feet in size. Drive aisles, parking, utilities and landscaping would also be installed as part of this phase. Before a building permit for the project is issued, two lot line modifications would be completed whereby the 595 Property would convey a strip of land to the Cooke Property, and the Cooke Property would convey a small strip of land to the Connecticut Shellfish Property. These conveyances are needed to comply with the conditions of approval for the PDD.
2. An access drive parcel would be created and an access drive would be built from East Industrial Road to the Cooke Property. This new driveway would create direct access from the Exit 56 southbound ramps to the Cooke Property. No buildings are proposed to be built within the Access Drive Parcel. The Connecticut Shellfish Property is currently developed with two buildings serving the existing wholesale shellfish processing business. The existing driveway access and parking on the Connecticut Shellfish

Property would be modified slightly to accommodate the modified traffic signal and new access drive connecting East Industrial Road and the Cooke Property. No new buildings are contemplated to be built on the Connecticut Shellfish Property.

3. A driveway would be built from the proposed Access Drive to the west, intersecting with East Industrial Road.

Wetlands and Watercourses Delineation

Wetlands and watercourses were delineated across the entire PDD area, including the Property included in this Application, by Environmental Planning Services, LLC (“EPS”). Michael S. Klein, James Cowen and Eric Davison of EPS are all registered soil scientists and certified professional wetland scientists with EPS. The plan sheets included in this Application include the delineation of wetlands and watercourses as well as applicable upland review areas. EPS has also prepared a report entitled “Wetland Delineation Inventory, Functional Analysis and Impact Assessment” for the Property which is included with this Application.

Summary of Proposed Regulated Activities

This Application has been carefully designed to avoid wetland impacts to the greatest extent possible. As described in the following section on the alternatives that were considered, the proposed Application represents, in the applicants’ opinion, the best alternative out of the many that were considered.

This Application proposes small amounts of direct wetland impacts in five locations:

1. Area A: The Access Drive crosses wetlands partially located on the Connecticut Shellfish Property and partially located on the Cooke Property. The area of direct impact is approximately 980 square feet (0.022 acres) in size.
2. Area B: The Access Drive crosses wetlands located on the Cooke Property. The area of direct impact is approximately 1,063 square feet (0.024 acres) in size.
3. Area C: The Connector Drive crosses wetlands located on the 595 Property. The area of direct impact is approximately 241 square feet (0.005 acres) in size.
4. Area E: The Connector Drive crosses wetlands located on the 595 Property. The area of direct impact is approximately 350 square feet (0.008 acres) in size.
5. Area F: The Connector Drive crosses wetlands located partially on the Cooke Property and partially on the Trustee Parcel. The area of direct impact is approximately 834 square feet (0.019 acres) in size.

The total area of direct impact associated with this Application encompasses a total of less than one-tenth of an acre (3,468 square feet, or 0.08 acres).

The Application also includes three general areas of activity within the upland review areas of the wetlands and watercourses located on the Property. The total amount of upland review area activity in this Application is approximately 310,319 square feet (7.12 acres).

Summary of Alternatives Considered

The applicants spent many months designing the plans included in this Application. Several different alternative layouts for the project were considered. The chosen alternative that is included in this Application represents the site layout with the least amount of direct wetland disturbance of the alternatives considered. The applicants also believe that the chosen alternative also has less potential for indirect wetland impacts than the other alternatives that were not selected. Following is a summary of the alternatives that were considered in preparing this Application. Copies of each alternative plan are attached to this narrative.

1. *Alternative A:* Alternative A was one of several early designs for the Master Plan that included primary vehicular access to the Cooke Property from a single driveway entrance on East Industrial Road across from one the driveways at the TA Travel Center. In order to access the eastern portion of the Cooke Property, this alternative would have required a significant wetland crossing on the Cooke Property that would have filled approximately 5,536 square feet of wetlands. Several other areas of direct wetland impact would also have been created by this alternative, and the total amount of direct wetland impact would have been approximately 11,287 square feet for the entire Master Plan area (7,396 square feet for the Costco Application area). This alternative was rejected in favor of finding a better solution for providing direct access to the Cooke Property from East Industrial Road.
2. *Alternative B:* Alternative B was designed after considerable effort was devoted to identifying a better solution for providing access to the Cooke Property from East Industrial Road. The applicants negotiated an arrangement with the owners of 20 East Industrial Road (Peter G. Mandragouras, Trustee) and 26 East Industrial Road (Connecticut Shellfish Company) whereby an access driveway would be built across from the Exit 56 southbound entrance and exit ramps into the Cooke Property. This access driveway reduced the amount of direct wetland impact associated with the access drive from 5,536 square feet to 2,221 square feet. This plan also eliminated several other smaller areas of direct wetland impact. The total amount direct wetland impact included in Alternative B was 7,772 square feet for the entire Master Plan Area (4,737 square feet for the Costco Application area), which was over 3,500 square feet less than Alternative A for the Master Plan Area. Alternative B was rejected in favor of finding a better solution for providing access from the area of the 595 Property with frontage on East Industrial Road to the area of the 595 Property with frontage on East Main Street.
3. *Alternative C:* Alternative C was designed after considerable effort was devoted to identifying a better wetland solution for providing access across the entire 595 Property. The owner of the 595 Property negotiated an arrangement with the owner of 22 Leetes Island Road (Stop & Shop shopping center) to provide for a better alignment for the internal connector driveway whereby the amount of direct wetland impact could be reduced. Alternative C reduces the total amount of direct wetland impact across the entire Master Plan area by 2,801 square feet. The total amount of direct wetland impact with Alternative C is 4,971 square feet across the entire Master Plan area (3,442 square feet for the Costco Application area).
4. *Chosen Alternative:* The chosen alternative is the plan that is proposed in this Application. The chosen alternative makes several minor changes from Alternative C.

The site layout in Alternative C was refined by rotating the Costco store 90° clockwise. Although the long axis of the store is now oriented in an east-west direction, a more efficient parking layout allows for a further reduction in the overall direct wetland impact (4,960 sq. ft.). The separating distance between the work and east side of Wetland 1 has also been substantially increased. The direct impact to Wetland 1 is confined to a single, 1,063 sq. ft. location. This alternative minimizes the amount of direct wetland impacts from the development of the Costco Application as well as the entire Master Plan area. Wetland crossing areas have been selected at the narrowest points along the wetland areas within the Property to minimize direct impacts. Driveway access within the Property has been limited to the minimum amount needed to provide access to the entire Property and to satisfy the conditions of approval of the overall Master Plan.

Erosion and Sediment Control Measures

The Application includes a complete soil erosion and sediment control plan that is included in Sheets EC-1 through EC-9. The Application has been designed in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as well as the Town of Branford Inland Wetlands and Watercourses Regulations and the Branford Zoning Regulations.

Proposed Stormwater Best Management Practices

The Application includes a Stormwater Management Report that has been prepared by BL Companies. This report includes a thorough description of the numerous stormwater quality measures that have been incorporated into the project design.

The project team conducted detailed analyses of alternative stormwater management and mitigation options. A deep test pit and soil boring program was conducted across the entire site to attempt to identify locations suitable for stormwater infiltration and areas that had suitable hydrology to support wetland creation areas. The results of the infiltration testing and deep test pits are attached to the Stormwater Report. The results of both test programs are consistent. The soils underlying the site are very dense, fine till and are deep to groundwater in most areas outside of the wetlands. This testing program also determined that Stormwater Basin B, can be constructed as designed to accommodate the required volume and provide wetland conditions, without an adverse impact on the nearby portions of Wetland 1.

We note that an important goal of the Town's Plan of Conservation and Development (POCD) is the protection of water quality. The POCD notes that to address stormwater pollution, Branford should improve the existing drainage systems (using modern water quality restoration techniques), continue to educate the public about the impacts of stormwater run-off, provide stormwater treatment and restrict run-off from new development (p. 18). Specific actions which are recommended in the POCD include the following (p. 20):

1. Improve stormwater treatment through vegetative buffers, open swales, detention basins, and rain gardens.
2. Prevent sedimentation of catch basins, drainage pipes, culverts, wetlands and waterways.

3. Retrofit existing stormwater management systems utilizing modern water treatment technology.

This Application addresses all of these goals. Currently, the Property includes virtually no stormwater pre-treatment measures. The Application proposes a coordinated approach to stormwater management across the entire Master Plan area, including the Costco project area, and it includes state-of-the-art stormwater pre-treatment practices, including catch basins with deep sumps, extended-flow detention basins, drainage swales, and stormwater treatment basins. The Application has been designed in accordance with the 2004 Connecticut Stormwater Quality Manual.

Wetland and Watercourse Impact Assessment

The EPS report includes a detailed wetland impact assessment, as well as an analysis of potential indirect impacts from the project. Development of the Costco Property, including the two access points to East Industrial Drive, will require work in wetlands at Areas A, B, C, E and F. The total activity in wetlands or watercourse necessary to develop this portion of the site is 3,468 sq. ft., or 0.08 acres. The work is unavoidable in order to provide safe access to and from the site, and the required internal circulation pattern. Impacts have been avoided and minimized to the maximum extent practical. The EPS report concluded that there will be no adverse impacts on wetlands or watercourses at or downstream of the site.

Proposed Mitigation Measures

EPS developed plans to mitigate for the unavoidable wetland impacts described above. As with the site development plans for the three different applications, the mitigation areas can be constructed independently of each other. The mitigation planning has also been coordinated to be consistent across parcel boundaries. EPS developed these plans based on soils, test pit, and hydrologic data collected at the site, supplemented by additional information provided by the engineers and groundwater specialists.

The designed final vegetation classes for the mitigation areas are wet meadow and emergent marsh, with a native shrub transition zone. The construction of this area will be overseen by the owner's wetland scientist, with 5 years of monitoring and reporting, as required by the regulations.

The mitigation plans include wetland compensation and enhancement. They also include additional measures designed to enhance the wetland features and conservation values at the site over the long term. These measures include the following:

- Invasive species control in wetland and non-wetland areas.
- Use of native plant materials and seed mixes in disturbed areas that abut wetlands.
- Modification of the stormwater treatment basins to provide wetland and non-wetland wildlife habitat.

Compensatory wetland mitigation will occur at two locations adjacent to Wetland 1. Wetland Enhancement will occur in Wetland 3. A total of 9,900 sq. ft. of wetlands will be

created and 12,050 sq. ft. of wetlands will be enhanced. The overall mitigation ratio for the Master Plan area is 4.5:1, exceeding the 2:1 mitigation ratio required under the Branford Inland Wetlands and Watercourses regulations. The ratio of compensatory mitigation (wetland creation) to wetland loss is also greater than 2:1. The mitigation ratios for the Costco and 595 parcels are 3.7:1 and 6.4:1, respectively. There are no direct impacts on the Trustee parcel.

The proposed wetland creation areas are contiguous with Wetland 1, the most significant wetland resource at the site. The plans also include enhancement of the upper portion of Wetland 3. This 12,050 sq. ft. mitigation area includes is located 9,500 sq. ft. on the 595 Property and 2,650 sq. ft. on the Costco Property. This is an area of old field and scrub vegetation that is primarily vegetated with invasive herbaceous and woody species. The invasives in the wetlands and upland review area will be removed. Native seed mixes, shrubs, and trees will be installed in this area.

Inland Wetlands Regulations Section 7.7 Certification

The applicants certify to the following:

1. No portion of the property involved in this Application is located within 500 feet of the boundary of an adjoining municipality.
2. The traffic attributable to the completed project will not use streets within the adjoining municipality to enter or exit the site.
3. No sewage or drainage from the project site will flow through and impact the sewage or drainage system within an adjoining municipality.
4. No water run-off from the improved site will impact streets or other municipal or private property within an adjoining municipality.