

Natural Resources Impacts “Towne Center at Shelter Ridge”

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Site Location: 122 acre property at Bridgeport Avenue, Mill Street, and Buddington Road
Map 50 Lot 9

Site Plans Reviewed: Dated March 22, 2016

Applicant: Shelter Ridge Associates, LLC

Proposal Summary:

Residential: 450 apartment units in a 9-story tower at top of ridge

Retail/Office: 506,000 sf, Parking: 3,550 spaces

Residential/Medical Office: 200 units residential and medical (32,000 sf)

Discussion: It is difficult to imagine a proposal for this site with a greater negative impact to Shelton’s key natural resources, and the city’s long-term efforts establish a quality greenway corridor in this area, and to restore the Paugussett Trail through that corridor, than this one.

Conservation’s “[*Natural Resources of Shelter Ridge*](#)”, prepared in February and presented to the applicant, identified a low ridge crossing the property that could be used to divide high-density development along Bridgeport Avenue from the residential and greenway areas located on the west side of this ridge. The flexibility of the PDD mechanism can allow for economic development as well as greenway/trails development if a unique convergence of key natural resources are protected. These resources include the Old Kings Highway open space, Mill Street Scenic Road, Far Mill River, the Old Kings Highway historic colonial roadbed, and a viable scenic route for the Paugussett “Blue Dot” Trail.

Instead of using the ridge to divide the greenway from the Bridgeport Avenue corridor, the proposed project includes a nine-story luxury apartment tower at the top of the ridge that would offer scenic views to prospective tenants. Additional buildings, drives, parking areas, and fill slopes are also depicted along the length of the ridgetop overlooking our high-value natural resources.

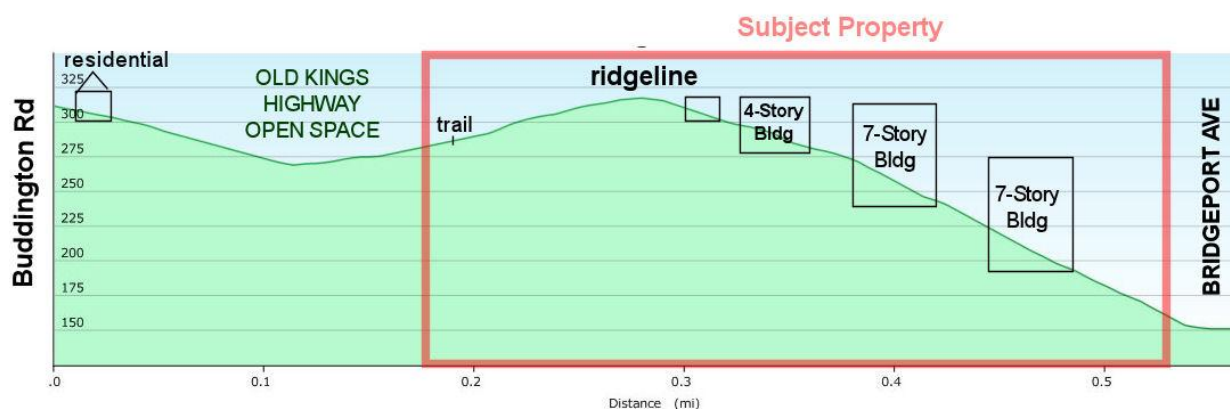
Rather than the complementary, win-win, site design that is possible for this site using the PDD mechanism, the proposed project would have a parasitic relationship to Shelton’s existing natural resources, utilizing our scenic resources as selling features while simultaneously degrading these features for the general public.

The residential tower, with 450 units, would be located within about 300 feet of the Old Kings Highway open space, a property that the city purchased after commencing eminent domain

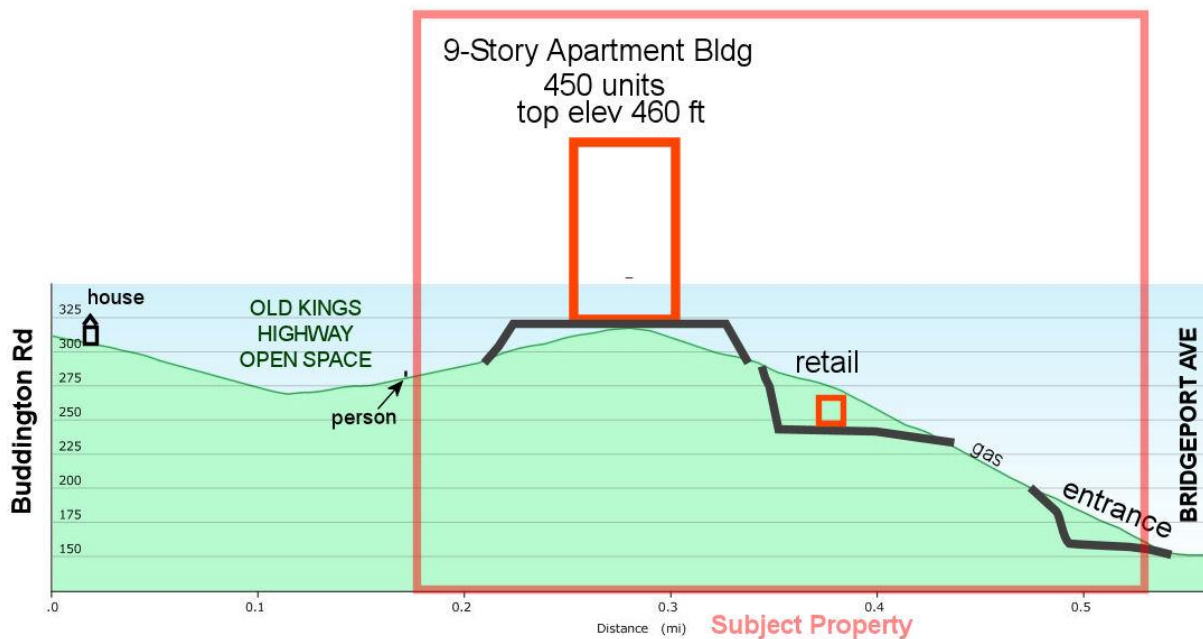
proceedings to prevent high-density housing from being built in the 1990s. This scenic area has waterfalls, the old stone-lined roadbed, and views of the Far Mill River. Arguments made by the city for open space preservation and against high density development in this location are as valid today as they were in the 1990s.

"Mr. Swift pointed out the corner of the site and added that it was really beautiful up there and it is where they are looking to do the luxury residences... He thinks that the Commission is going to be impressed and that is the goal for that area – maybe a notch below or perhaps even rivaling the Renaissance – something very high quality because they have the location to do that." - P&Z Meeting Minutes, January 12, 2016

A comparison of how the site could be developed without visual impacts to the greenway or residential areas (top) to the proposed project (bottom):



Using the ridgeline as a visual barrier between land uses.



Impacts to Natural Resources: This section addresses the impacts of the proposal to key natural and community resources that were previously identified in the “Natural Resources of Shelter Ridge, February 2016.”

1. **Old Kings Highway (roadbed).** The scenic aspect of this surviving section of the historic colonial roadbed would be severely degraded by intense development along the ridgetop, especially the nine-story apartment tower and associated parking, which would be constructed within 50 feet of the roadbed. There is also concern that plans could be modified to convert the roadbed into an emergency access road.
2. **Old Kings Highway Open Space.** This 16-acre property contains scenic waterfalls and is a potential destination location for residents along a restored Paugussett Trail. This proposal would severely degrade the scenic character of this open space with the construction of the 9-story residential tower overlooking the property with associated parking and a major fill slope at its base. This open space would be demoted to a treed buffer area rather than as a scenic destination location for the general public.
3. **Paugussett “Blue Dot” Trail Restoration.** The 25-year effort to the extend the Paugussett Trail to the Stratford border would come to an end if this proposal is approved. Although the applicant shows a trail crossing the property, it is not the type of scenic route that rises to the standards of a CFPA Connecticut Blue Blazed Trail. (Note that only the Connecticut Forest and Park Association has the authority to designate a trail as a “Connecticut Blue-Blazed Trail.”) This section of trail, which is nearly a mile long, would run alongside new buildings and parking areas from Buddington Road all the

way to Bridgeport Avenue before the required half-mile road walk on Beard-Sawmill. Although short stretches of CT Blue-Blazed Trails can tolerate substandard trail sections if that section leads to a highly scenic area, the total mileage of this degraded section would be an unacceptable 1.5 miles.

4. **Mill Street (Shelton's first Scenic Road):** The nine-story tower above Mill Street would be visible from approximately the old Stump Joint Mill (#104 Mill Street) to Bridgeport Avenue, a distance of about half a mile. The massive modern tower would contrast sharply with the existing scenic character of the roadway.
5. **The Far Mill River:** The nine-story tower would degrade the view from the Far Mill River, used for trout fishing and kayaking. In addition, the development will have impacts on stormwater runoff, a topic reserved for the Inland Wetlands Commission.
6. **Wildlife Impacts:** The site intensity and loss of habitat will have severe impacts on existing wildlife. No viable wildlife corridor is being maintained through the property. The new road between Bridgeport Avenue and Buddington Road would lead to a major increase in traffic and increased mortality at the major spring amphibian crossing located on Buddington Road between Maggie Lane and Buck Hill Lane.

Open Space Dedication: The site plans show an open space dedication of 24 acres, or 20% of the site. This new open space consists largely of steep slopes, wetlands, powerlines, the gas line, and areas disturbed by grading and site development. It would have little public value for recreation and would serve primarily as a buffer of trees between new construction and the residential neighborhood. This narrow buffer would not adequately screen the new development from the residential neighborhood and public open space areas.

The PDD Mechanism: The following excerpts from the PDD regulations pertain to the natural and historic resources.

Intent (34.1): The intent of the PDD is "to encourage and accommodate unique and desirable development that will be consistent with the long range, orderly development of an area but is not accommodated by the established conventional zoning of that area." Due to the convergence of the city's greenway and economic development corridors, located in close proximity to each other, the PDD mechanism has the potential to allow for a more appropriate site design than the underlying LIP zone. However, this potential has not been realized in the proposed site plan. The areas that have been set aside for open space are unbuildable and have little value for public recreation as the site is currently designed.

Building Height (34.3.5): "Buildings and other structures shall not exceed a height of 60 feet..." unless three conditions are met. The 9-story residential tower at the top of the hill above Mill Street, a Scenic Road, would be 140 feet tall according to the applicant. The second condition is that the height "shall result in the preservation of more open space." Most of the designated

open space is unbuildable, so it is unlikely this tall building is leading to more open space. The third condition is that the “topography of the tract on which such building or structure is located, the location thereof on such tract, and the nature thereof are appropriate to accommodate such greater height.” In terms of conservation and the neighboring residential area, this ridgetop is the worst possible location for a 140-foot tower. The regulation also states that “such added height shall not be for the sole purpose of creating additional development density but rather to accommodate otherwise allowable density in an alternative manner.” This tower does in fact appear to be designed for maximizing development density for the site.

Natural Features (34.3.8): “When reasonably prudent and feasible, development proposals shall make reasonable attempts to adapt to existing topography and natural site features.” For this site, the ridgetop was identified as a natural site feature that should be used to protect the residential and greenway corridor from the Bridgeport Avenue commercial areas. Although doing so would not allow for the maximum profit, there remains significant potential commercial development of the site along Bridgeport Avenue.

Findings Required for Initial Development Concept Plan Approval (34.8)d: “Provisions for ...usable open space are adequate and acceptable.” The proposed open space is not “usable”, but is dominated by steep slopes, wetlands, powerlines, the gas lines, and major fill slopes (rip rap).

(34.8)f: “The proposal will not have a significant adverse impact of surrounding properties.” This proposal will have a significant negative impact on the adjacent Old Kings Highway open space owned by the City of Shelton, which was intended to ultimately serve as a destination site along a restored Paugussett Trail. The proposal would eliminate any realistic chance of continuing the Paugussett Trail into the property. Further, the 140-ft tower with 450 residential units would be located adjacent to the open space, significantly degrading the scenery.

(34.8)g: “Ecological and environmental concerns associated with the proposal...will be adequately addressed.” The impacts to this important connection between the Shelton Lakes and Far Mill River Greenway corridors have not been adequately addressed.