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May 14, 2019

Dennis Goderre, ASLA, AICP CUD  
Groton City Planner  
295 Meridian Street  
Groton, CT 06340

**RE: Analysis of Special Permit Criteria Per Section 9.4.D**  
**Applicant/Owner: Thames Leasing, LLC**  
**Location: 18 Thames Street, Groton, CT**  
**Boundaries LLC Job I.D. No. 19-2707**

Mr. Goderre,

Pursuant to correspondence dated 5/7/19 and submitted with our applications for Site Plan Review, Coastal Site Plan Review and three (3) specified Special Permits, the following is an analysis of the Special Permit Criteria contained in Section 9.4.D of the City of Groton Zoning Regulations, for each of the three (3) Special Permits requested.

It is important to note that the uses under which we have made application, Professional Office (Sec. 4.3.C.7) and Other Accessory Uses (Sec. 4.3.E.1) are permitted by Site Plan Approval and are not subject to these Special Permit Criteria. The Special Permit Criteria relate only to the aspect(s) of the proposal for which a Special Permit is required, but not the entire proposal, in general.

**Special Permit Requested in Accordance with Section 7.1.C.c (On-Street Parking)**

**1. Zoning Purposes**

The utilization of eight (8) existing, designated on-street parking spaces that are located within 150' of the subject property is consistent with the purpose and intent of the City of Groton Zoning Regulations. Logic would dictate that the P&ZC would not have included the Section under which we are applying for this Special Permit, had the Commission not considered a set of circumstances under which it would be deemed acceptable to approve the same. Our proposal involves the adaptive re-use of an existing building with limited area for provision of on-site parking, likewise necessitating the use of the on-street spaces to meet the prescribed parking requirement.



**2. Environmental Protection & Conservation**

The utilization of eight (8) existing, designated on-street parking spaces is not applicable to the protection, preservation and/or enhancement of natural, scenic, historic or unique resources in the City of Groton.

**3. Overall Neighborhood Compatibility**

There are eight (8) existing, designated on-street parking spaces located within 150' of the subject property. These parking spaces were created as part of a streetscape improvement project on Thames Street that was undertaken by the City of Groton. Parking of vehicles within existing, on-street parking spaces designed and constructed under the direction of the City of Groton, indicates compatibility with the Thames Street neighborhood.

**4. Suitable Location for Use**

The parking of vehicles within eight (8) existing, on-street parking spaces designed and constructed for the parking of vehicles under the direction of the City of Groton will be in harmony with the appropriate and orderly development in the GC Zoning District and the Thames Street neighborhood.

**5. Appropriate Improvements**

The section of Thames Street adjacent to the subject property was designed and constructed for utilization of the eight (8) existing, designated on-street parking spaces that will be used as part of this proposal. These parking spaces are located adjacent to sidewalks that are in good repair, and adequate lighting is provided via pole-mounted and ground-mounted streetscape lighting designed to be appropriate for the use.

**6. Suitable Transportation Conditions**

The section of Thames Street adjacent to the subject property was designed and constructed for the eight (8) existing, designated on-street parking spaces that will be utilized as part of this proposal.

**7. Adequate Public Utilities & Services**

This standard is not applicable to the utilization of the eight (8) existing, designated on-street parking spaces located within 150' of the subject property.

**8. Long Term Viability**

The eight (8) existing, designated on-street parking spaces located within 150' of the subject property are located within the Thames Street right-of-way owned and maintained by the City of Groton, which indicates adequate provision for sustained maintenance of said parking spaces.

**9. Nuisance Avoidance**

The utilization of eight (8) existing, designated on-street parking spaces located within 150' of the subject property will not create any nuisance to the surrounding area.

**10. Plan of Conservation & Development**

Section 2.1 of the 2019 City of Groton Plan of Conservation & Development identifies strategies to strengthen and enhance Thames Street, with #4 (page 11) which aims to promote private development that contributes to the overall vision for the Thames Street area and is consistent with existing historic character and scale, and #8 (page 11) specifically identifying public investment in the provision of on-street parking as a means to meet current and future parking needs.

**11. Mitigation**

The parking of vehicles within eight (8) existing, on-street parking spaces designed and constructed for the parking of vehicles under the direction of the City of Groton will not cause any impact to the adjacent neighborhood that would require mitigation.



## **Special Permit Requested in Accordance with Section 7.1.E.a (9' x 18' Parking Spaces)**

### **1. Zoning Purposes**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' is consistent with the purpose and intent of the City of Groton Zoning Regulations. Logic would dictate that the P&ZC would not have included the Section under which we are applying for this Special Permit, had the Commission not considered a set of circumstances under which it would be deemed acceptable to approve the same. Our proposal involves the adaptive re-use of an existing building with limited area for provision of on-site parking, and during pre-application meetings, City Officials indicated a desire to keep the existing stone and mortar retaining wall at the front of the property. In order for this wall to be saved, the incorporation of 9' x 18' parking spaces along the front property line is necessary to achieve the required 24' travel aisle width between the parking spaces and the building. It is our opinion that the location and distribution of parking spaces and overall circulation pattern as proposed is appropriate for the intended use.

### **2. Environmental Protection & Conservation**

Although the existing stone and mortar retaining wall at the front of the subject property is not natural, scenic, historic or particularly unique, City Officials have indicated a desire to keep the stone and mortar retaining wall at the front of the property due to its positive aesthetic influence on the streetscape. In order for this wall to be saved, the incorporation of 9' x 18' parking spaces along the front property line is necessary.

### **3. Overall Neighborhood Compatibility**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' will not have a detrimental effect on neighboring properties or the development of the district. The 9' x 18' parking spaces as proposed will not be visually discernable from the 9' x 20' spaces that are typically required.

### **4. Suitable Location for Use**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' will be in harmony with the appropriate and orderly development in the GC Zoning District and the Thames Street neighborhood. The 9' x 18' parking spaces as proposed will not be visually discernable from the 9' x 20' spaces that are typically required.

### **5. Appropriate Improvements**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' is a necessary component of the overall redevelopment plan for the subject property as depicted on the Site Redevelopment Plans. It is our opinion that the location and distribution of parking spaces and overall circulation pattern as proposed is appropriate for the intended use.

### **6. Suitable Transportation Conditions**

In accordance with the Site Redevelopment Plans, three (3) of the thirteen (13) proposed 9' x 18' parking spaces will be located where the northerly site access drive is currently located. The applicant, with the support of City Officials, proposes to eliminate this northerly access drive as part of the redevelopment proposal, both because the sightlines are not ideal from this drive, and to maximize the number of on-site parking spaces provided. It is our opinion the location and

distribution of parking spaces and overall circulation pattern as proposed is appropriate for the intended use.

**7. Adequate Public Utilities & Services**

This standard is not applicable to the allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20'.

**8. Long Term Viability**

All of the on-site parking spaces to be constructed as part of the proposed site redevelopment will be new, with newly placed and compacted base material, new bituminous concrete, new bituminous concrete lip curb, and new paint line striping. Like all other aspects of the property, these spaces will be maintained in good condition in perpetuity by the applicant/owner.

**9. Nuisance Avoidance**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' will not create any nuisance to the surrounding area.

**10. Plan of Conservation & Development**

Section 2.1 of the 2019 City of Groton Plan of Conservation & Development identifies strategies to strengthen and enhance Thames Street, with #2 (page 11) which aims to maintain and enhance a "sense of place" along Thames Street, and #4 (page 11) which aims to promote private development that contributes to the overall vision for the Thames Street area and is consistent with existing historic character and scale. Both of these strategies relate to the preservation of the stone and mortar wall along the front property line and its positive aesthetic influence on the streetscape.

**11. Mitigation**

The allowance for thirteen (13) of the twenty-one (21) total on-site parking spaces to be 9' x 18' instead of the typically required 9' x 20' will not cause any impact to the adjacent neighborhood that would require mitigation.

**Special Permit Requested in Accordance with Section 7.7.D.2 (Stormwater Management)**

**1. Zoning Purposes**

Our proposal involves the adaptive re-use of an existing building on an already developed parcel of land, and pre-application discussion with City Officials has indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems. Aiming to achieve the broadest level of compliance with often competing zoning requirements for parking and stormwater management when proposing redevelopment of an existing site requires a balance. City Officials have communicated to the applicant a preference to: (1) maximize on-site parking; (2) keep the stone and mortar retaining wall along the front property line that contributes a positive aesthetic influence on the streetscape; and (3) maintain the existing stormwater drainage pattern. The applicant agrees that this approach achieves the broadest level of consistency with the purpose and intent of the City of Groton Zoning Regulations, and that a Modification of the requirements of Section 7.7.C is justified for this proposal.

**2. Environmental Protection & Conservation**

Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will not be detrimental to the preservation and/or enhancement of natural, scenic, historic or unique resources in the City of Groton.



**3. Overall Neighborhood Compatibility**

Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will not have a detrimental effect on neighboring properties or the development of the district.

**4. Suitable Location for Use**

Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will be in harmony with the appropriate and orderly development in the GC Zoning District and the Thames Street neighborhood.

**5. Appropriate Improvements**

This standard is not applicable to the modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage, as no stormwater management improvements are proposed to be constructed.

**6. Suitable Transportation Conditions**

This standard is not applicable to the modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage.

**7. Adequate Public Utilities & Services**

Water supply, sewage disposal and emergency access are not relevant to this Special Permit request. Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will not negatively impact existing stormwater management infrastructure, as there are no existing stormwater management improvements adjacent to the subject property. The closest catch basin is approximately 250' southerly of the existing southerly entrance drive.

**8. Long Term Viability**

This standard is not applicable to the modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage, as no stormwater management improvements are proposed to be constructed.

**9. Nuisance Avoidance**

Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will not create any nuisance to the surrounding area.

**10. Plan of Conservation & Development**

Section 2.1 of the 2019 City of Groton Plan of Conservation & Development identifies strategies to strengthen and enhance Thames Street, with #4 (page 11) which aims to promote private development that contributes to the overall vision for the Thames Street area and is consistent with existing historic character and scale.

**11. Mitigation**

Because City Officials have indicated that the existing pattern of stormwater drainage has not historically caused any identifiable issues or problems, we believe that modification of the requirements of Section 7.7.C in order to maintain the existing pattern of stormwater drainage will not cause any impact to the adjacent neighborhood that would require mitigation.

We hope you find this information useful in your analysis of our three (3) Special Permit requests, and we look forward to presenting our application to the City of Groton Planning & Zoning Commission at the Public Hearing scheduled for June 18, 2019.

Thank you.

Sincerely,

A handwritten signature in black ink, reading "Demian A. Sorrentino". The signature is written in a cursive style with a large, stylized initial "D".

Demian A. Sorrentino, AICP, C.S.S.  
Certified Planner & Soil Scientist  
Boundaries LLC  
*for* Thames Leasing, LLC