### ZONING MAP AMENDMENT

**PLPZ 2021 00331**

Renamba Greenwich LLC.:

for a Zoning Map Amendment, to re-zone property located at 0 Old Track Road from GB to the proposed GB-MRCO (Managed Residential Overlay) Zone

### APPLICATION SUMMARY:

The applicant has filed for a Zoning Map Amendment, to re-zone property located at 0 Old Track Road from GB to the proposed GB-MRCO (Managed Residential Overlay) Zone.

### ISSUES / RECOMMENDATIONS:

1. The subject action has been designed in conjunction with a preliminary site plan/special permit, and zoning text amendment to create the applicable overlay zone. The Commission will need to consider the application to amend the regulations, before acting on this application and then the site plan application.

2. POCD - In making any decision to change the Zoning Map of the Town, the Commission shall take into consideration the Plan of Conservation and Development, per the State’s Statutes. The applicant should elaborate, to the Commission; the ways the subject Map amendment would meet the recommendations of the POCD.

### DEPT. COMMENTS:

WestCOG

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### PROPOSAL:

The applicant is proposing to amend the Town’s Building Zone Regulations, to create a new overlay zone for “managed residential communities” and then apply it the subject 2.5-acres parcel located at 0 Old Track Road, at the southern terminus of Old Track Road.

The applicant has indicated that the Town’s current zoning regulations is not conducive to permit development of a, “managed residential community” as defined and licensed through the State’s Department of Public Health. Such a facility is defined as a facility “consisting of private residential units that provides a managed group living environment consisting of housing and services for persons who are primarily fifty-five years of age or older…”. If adopted the new regulation would require applications for use a use to apply for re-zoning and special permit in conjunction with said use. The proposed criteria for re-zoning would appear to include:

- The purpose of the zone is proposed to, “...encourage the development of age-friendly housing options that provide “Assisted living services” to broaden the range of housing and health care options for Greenwich’s increasing elderly population. The MRCO is designed to encourage such housing developments in close proximity to commercial
centers and provide attractive congregate housing for elderly residents within the context of the Town’s predominantly residential character.”

- To promote multifamily elderly housing within close proximity to the Town’s existing commercial centers and within an area of the Town which can provide the necessary infrastructure to support such development, such as, but not limited to, road network, water supply, storm drains, sewage disposal, etc., a MRCO may be located in any GB or GBO zone. The Commission will need to determine if the location meets the stated criteria.

- No Managed Residential Community facility shall be allowed on parcels which are within the Flood Plain District or designated by the Federal Emergency Management Agency as either a special flood hazard area or a floodway. The subject parcel appears to be out of any such designated area(s).

- An application to rezone a site to a MRCO shall be submitted in conjunction with site plan and special permit applications, or pre-applications, as applicable, in accordance with Section 6-13-6-15 of these regulations, and shall be subject to Special Permit procedures and standards pursuant to Section 6-17. The applicant filed a pre-application and appeared before the Commission on July 14, 2020. The Commission would need to determine if the proposal is compliance with these applicable standards.

2019 POCD:

The applicant notes that the map amendment would be in line with objective 2.3 of the Town’s 2019 Plan of Conservation and Development which calls to, “Facilitate housing options that encourage seniors to stay in Greenwich (“aging-in-place”) and are designed for enjoyment of all.” Moreover, the applicant also cites to objective 2.3 a., which recommends to, “Promote age-friendly housing options in or near walkable, pedestrian-friendly areas with one floor living, lifestyle amenities, elevators, limited maintenance, and proximity to restaurants and other retail.”

The applicant should elaborate, to the Commission; the ways the subject text amendment would meet the recommendations of the POCD.

OTHER APPLICATIONS:

Zoning Text Amendment: if the noted text amendment was to be adopted, the applicant is also seeking to re-zone the subject property into the yet to be created MRCO overlay zone.

Preliminary Site Plan/Special Permit: in addition to this application, the applicant is also seeking preliminary approval to develop a facility in concert with this amendment.

APPLICABLE REGULATIONS:

Sec. 6-22
July 19, 2021

Ms. Katie DeLuca, Town Planner
Planning and Zoning Commission
Town Hall – 101 Field Point Road
Greenwich CT 06830

Re: Proposed Zoning Text Amendment for New Managed Residential Community Overlay Zone (MRCO)
Proposed Re-Zoning from GB to GB-MRCO Zone
Preliminary Site Plan/Special Permit Applications - Proposed Managed Residential Community (MRC)
0 Old Track Road, Greenwich, CT
Applicant/Owner: Renamba Greenwich LLC

Dear Katie:

On behalf of our client, Renamba Greenwich LLC, we are pleased to submit herewith to the Greenwich Planning and Zoning Commission (hereinafter, the “Commission”) the following applications to permit the construction of a new Managed Residential Community at 0 Old Track Road, Greenwich, in the GB Zone:

1. Application to Amend Section 6-115 of the Greenwich Building Zone Regulations to create a new MANAGED RESIDENTIAL COMMUNITY OVERLAY ZONE (MRCO) that will address the Town’s objective, as identified in the 2019 Plan of Conservation and Development (the “POCD”), to “create regulations specific to assisted living facilities…[and] facilitate housing options that encourage seniors to stay in Greenwich (‘aging-in-place’)”;

2. Application to Amend the Building Zone Regulation Map to re-zone a 2.5344-acre parcel of land at 0 Old track Road from the GB zone to the GB-MRCO Zone to accommodate the proposed development of a Managed Residential Community as defined by Section 19a-693 of the Connecticut General Statutes; and

3. Applications for Preliminary Site Plan and Special Permit Approval pursuant to Sections 6-13 through 6-15, 6-17, 6-101, and 6-115 (new).

Background and Need

It is widely accepted that with current scientific and technological advancements people are living longer and healthier lives, resulting in a growing elderly population. According to the 2020 US Census, 18.1% of Greenwich’s population is 65 years of age or older and approximately 24.4% of the population is 60 years of age or older1. This reflects a significant increase in Greenwich’s aging population by 1.2% and 4.4%, respectively, when compared to statistics from 20112. As the elderly population has grown, so has the demand for diverse housing options for seniors, especially for assisted living facilities and comprehensive care communities. Unfortunately, there is a deficiency of housing opportunities in Greenwich which is clearly evident when reviewing the Commission on Aging’s Resource Guide. Of the

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sixteen (16) assisted living facilities listed within the Guide, only one (1) is located in Greenwich. Compounding this need is the fact that Greenwich’s share of seniors within its population is higher than in our neighboring towns of Stamford, Darien and New Canaan3, resulting in Greenwich residents being more likely to have to relocate out of the community to find housing that can provide the services needed by this population.

The need for elderly housing in Greenwich is not new. In 2011 the United Way’s Assessment of Human Service Needs & State of Greenwich Statistical Report noted that:

“[S]eniors themselves cite housing and transportation among their two biggest concerns…With regard to housing, participants in senior focus groups repeatedly wondered where they would live when they need or wish to downsize, but still want to remain in the community… [Some] suggest that Greenwich has lost and will continue to lose countless longtime citizens to its neighboring community [of Stamford] based on its failure to provide local alternatives…[While] assisted living and continuing care housing models are appropriate for those who cannot live on their own, many of the existing facilities have waiting lists and most believe that growing demand is likely to far outpace the current or planned supply in the not too distant future.” (Page 8-9)

In 2016, the United Way Report re-stated that “[h]ousing continues to be of the greatest concern to older adults.”

As a result of the ongoing observed need for more housing opportunities for Greenwich’s aging population, the 2019 POCD set an objective (Objective 2.3) to: “facilitate housing options that encourage seniors to stay in Greenwich (“aging-in-place”) and are designed for enjoyment of all.” To that end, the POCD includes a Priority Action Item to “develop regulations for assisted living facilities and comprehensive care communities.”

Proposed Managed Residential Community Overlay Zone

As noted above, the 2019 POCD lists one of the Town’s prime objectives is to: “facilitate housing options that encourage seniors to stay in Greenwich (‘aging-in-place’)” (2019 POCD, Objective 2.3, Page 55). To accomplish this goal, the POCD recommends that the Town:

“a. Promote age-friendly housing options in or near commercial areas…[with] lifestyle amenities and elevators, and that are close to restaurants and other amenities…; and b. Create regulations specific to assisted living facilities…”

The above-outlined objectives recognize that, while the current Greenwich zoning regulations contain provisions intended to provide housing opportunities for seniors (e.g., R-PHD-E and CCRC regulations), the current regulations do not adequately address the lack of assisted living facilities in Greenwich.

More specifically, Greenwich's Zoning Regulations provide for disparate congregate housing opportunities for the elderly. The RPHD-E zone is ideal for the more independent elderly person and

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provides very limited assistance in terms of day-to-day activities. In contrast, the Continuing Care Retirement Community ("CCRC") zone allows for a complete range of services to its residents including on-site medical services and care. We believe that by creating a zone specific to providing Assisted Living Services, as defined in Section 19a-693 of the Connecticut General Statutes, the Commission will be taking a step towards meeting the needs of the Greenwich population that fall in-between these extremes; those people who do not need full nursing home services, but still require some health care, nursing, or assistance with activities of daily living, such as dressing, eating, bathing, toileting, walking, or transferring from a bed to a chair.

The proposed Managed Residential Community Overlay Zone (MRCO) has been drafted to carefully follow the requirements of the Connecticut statutes (C.G.S. Sec. 19a-693) and the regulations of the Department of Public Health for a “managed residential community”, which is defined by the State as a facility “consisting of private residential units that provides a managed group living environment consisting of housing and services for persons who are primarily fifty-five years of age or older...”. This approach will ensure that a development approved by the Commission within the new MRCO Zone will meet all statutory and regulatory requirements for a “managed residential community.” In addition, we believe that the new zoning regulation will promote senior housing opportunities within a size and scale compatible with Greenwich’s traditional land use development patterns.

Attached hereto as EXHIBIT A is a DRAFT of the proposed zoning regulation, Section 6-115. Managed Residential Community Overlay Zone (MRCO). Key elements of the proposed MRCO regulation are as follows:

1. Unlike the R-PHD-E zone, a MRC development may be privately developed and not limited to non-profit sponsors.

2. Unlike both the R-PHD-E and CCRC zones, a MRC development is permitted only in the GB or GBO zones, in areas which will, more likely, not conflict with established residential development and still be close to central Greenwich community services such as transportation and shopping.

3. Unlike a CCRC development, a MRC is specifically designed to support elderly individuals who can still live generally independently but require assistance with Activities of Daily Living, such as dressing, bathing and dining. Small kitchennettes, which do not contain stoves or ovens, are provided for snacks and non-cooked meals. These communities also offer things like transportation services, cleaning, laundry, and basic medical services. These basic medical services include medication management, on-site pharmacy access, and basic first aid, but do not provide full on-site medical support like a CCRC facility.

4. To meet the recognized community need to provide elderly housing opportunities that will allow elderly residents to remain within the Greenwich community and to meet the needs of the aging population, the regulation provides zoning incentives for developers consistent with similar regulations. Specifically, the Planning and Zoning Commission may provide the following zoning incentives to create a MRC development (including alteration of, or addition to, an existing building):

   - An “as-of-right” FAR of 0.75 would be permitted for MRC developments, which is consistent with the CCRC regulations for projects located in the GB and GBO zones. In addition, applicants would have the opportunity to obtain additional floor area for larger properties
through stepped incentives not to exceed 0.9. The 0.9 maximum FAR permitted is consistent with the FAR permitted in the R-PHD-E Zone.

- Building height and number of stories would be permitted at 47 ½ Feet and 4 stories, respectively, subject to the Commission making a finding that such allowances were compatible with the surrounding topography and surrounding buildings and/or uses.

- A 30% Building Area would be permitted, which is consistent with most commercial zones. Additionally, the definition for calculating Building Area within the MRCO zone has been adjusted to account for potential underground parking areas. It can be noted that the adjustments to Building Area would not carry-through to overall lot coverage, which would remain consistent with the underlying zone (60%).

Proposed Rezoning of Land from GB to GB-MRCO

Subject to the Planning and Zoning Commission’s approval of the proposed MRCO Zone, and in order to support the proposed site development, the applicant proposes to rezone its entire 2.5344-acre site from the GB zone to the GB-MRCO zone. The proposed amendment to the Building Zone Regulation Map is denoted on the attached Sheet entitled, PROPOSED AMENDMENT TO BUILDING ZONE REGULATION MAP FROM GB TO GB-MRCO dated July 15, 2021, prepared by Rocco V. D’Andrea, Inc. Said Map is provided herewith as EXHIBIT B.

Proposed Managed Residential Community Development

The Site

The proposed managed residential community development, designed to conform to the new MRCO regulation, is to be located upon a 2.5344-acre parcel at the end of Old Track Road in the proposed GB-MRCO Zone. The property is bounded to the north by Old Track Road and a vehicle storage facility; to the east and southeast by the CT Metro-North Railroad; to the south/southwest by residential properties on Rodwell Avenue; and to the west by Spring Street.

The site was previously owner occupied by R D & D Land Development, Inc. and utilized as a yard for its local excavating business. The site is improved with a small office building, a shed, and several storage containers and storage piles. Our client took ownership of the subject site in September of 2019 and the property has not been physically altered to date. The site is within the Town's public sewer and water service areas.

Consistent with the subject site’s previous use, Old Track Road has historically been developed with commercial uses. However, in recent years the area has seen the nearby development of attractive multifamily residential uses due to its central Greenwich location and proximity to services and Town amenities.

Proposed Site Development

The proposed MRCO development is intended, in many ways, to reflect the appearance and operation of the Ambassador at Scarsdale, which has operated successfully, at 100% occupancy, for a number of years and is owned and operated by the developer of the proposed Greenwich project. As shown on the plans submitted herewith, the applicant proposes to construct a 3 ½-story, 98,058 +/- square foot building at the terminus of Old Track Road. The facility will include 104 1-bedroom assisted living apartments and 30 memory care studio units.
As proposed, the new building will consist of 3 ½ stories above grade, plus two (2) below grade floors consisting of a parking garage at the lowest level (FFE: 50) and occupiable space on the terrace level above (FFE: 60). Starting at the lowest level, the parking garage will provide a total of 77 below grade parking spaces including 61 standard spaces, 3 handicap spaces, and 13 overflow tandem spaces. Aside from parking, this level will house an elevator, stairs, and mechanical and storage spaces, the parking garage will be entirely below grade and does not constitute Gross Floor Area.

Moving up to the next level, the “Terrace Level”, will provide both community and support spaces. This includes:

- A Performing Arts Theater for small operas, music performances, invited speakers, or group events that can provide provocative discussions aimed at keeping residents intellectually stimulated;
- A Wellness Center dedicated to on-site physical, occupational, and speech therapy;
- A Salon for on-site hair and beauty services;
- Clinical spaces that provide exam rooms for on-site doctors, visiting specialist and 24/7 nursing staff;
- An Art room;
- A multi-purpose room;
- A commercial kitchen, with adjacent loading area and dining room for assisted living residents; and
- Administrative offices, a mailroom, laundry facilities, restrooms, mechanical rooms, and housekeeping and storage rooms.

The Terrace Level is also considered a “basement” as defined in 6-5(a)(3.3) of the Greenwich Building Zone Regulations and meets all provisions of the regulations, as amended, to be exempt from the building’s overall gross floor area.

The next level, which is set at elevation 72, is considered the First Floor and sits at grade with the driveway, main entrance, and port cochere. The space is approximately 28,153 SF includes:

- The building’s lobby and reception area;
- Administrative offices and a conference room;
- A 24/7 bistro that will provide full-service leisure dining space for residents and families;
- A small cinema with surround sound for a true movie theatre experience;
- A Dining Room and Activity Space for Memory Care residents
- A library, living room and game room;
- Thirty (30) Memory Care Units; and
- Four (4) Assisted Living Units.

This level of the development is also at-grade with the surrounding site improvements. Exterior improvements at this level include three (3) exterior parking spaces (two standard spaces and one HC
space), outdoor recreational space (discussed in more detail below), an emergency generator, an enclosed refuse area and access to a loading area.

The second and third floors are approximately 28,000 SF each and are primarily dedicated to assisted living residential units with 41 units, respectively. The top floor is a 13,820 SF half-story, as defined in Section 6-5(a)(45.1) of the Regulations and contains eighteen (18) assisted living units and an activity space with balcony. The new facility will be sprinklered and will be served with new water and sewer connections from Old Track Road.

**General Operations**

The proposed Managed Residential Community will be managed by RENAMBA GREENWICH LLC, and will be licensed by the Connecticut Department of Public Health (DPH) to manage the facility in accordance with all applicable provisions of the Connecticut General Statutes and regulations of the DPH. Qualified staff will provide all necessary services including assistance with Activities of Daily Living, meal preparation and wait staff, limited medical services, around-the-clock nursing, on-site therapy services, and provide daily recreational activities.

While the facility will be staffed twenty-four hours a day, seven days a week, employees will work regular schedules, with the greatest number of employees (40) working generally between business hours from 7:00 a.m. to 5:00 p.m. Staffing tapers off after 5:00 p.m., with thirty (30) employees on-hand from 5:00 p.m. to 8:00 p.m., fifteen (15) employees present from 8:00 p.m. to 11:00 p.m. and ten (10) employees covering the overnight hours from 11:00 p.m. to 7:00 a.m.

**Parking**

The Greenwich Zoning Regulations currently do not provide a specific parking recommendation for a Managed Residential Community/Assisted Living use. Accordingly, the applicant has considered similar nearby facilities in combination with the proposed use to suggest an appropriate parking requirement as part of the proposed MRCO Zone regulation. In addition, based upon the applicant’s experience, parking for the proposed use would be primarily generated by staff, followed by visitors. This is due to the fact that most residents do not own cars or drive. The parking requirements proposed within the draft MRCO Zone regulation reflect this experience.

To create a suitable parking requirement for the proposed MRCO Zone, the Applicant’s design team analyzed several facilities in Fairfield County, along with the applicant’s existing Ambassador facility in Scarsdale. Specifically, our office reviewed municipal codes for similar facility types and also analyzed the ratios of employees to parking spaces. In addition, the Applicant’s traffic consultant, Kimley Horn, conducted a review of Codes from six (6) nearby jurisdictions within Fairfield and Westchester Counties to determine typical parking requirements for similar facilities, conducted parking surveys at the developer’s Scarsdale Ambassador facility, and analyzed data from the ITE Parking Generation Manual, 5th Edition.

When parking was analyzed in relation to the number of employees, results ranged from 0.95 spaces per employee in Scarsdale and 1.7 spaces per employee in Southport, with an overall average of 1.35 spaces per employee (see EXHIBIT C). When parking was analyzed on a per-unit basis by Kimley-Horn, parking ratios for assisted living and senior housing facilities were found to range from 0.20 to 0.52\(^4\) parking spaces per unit. The average requirement of the six (6) municipalities for which data was collected by Kimley-

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\(^4\) The Village of Port Chester requires just 0.2 parking spaces per unit while the City of Stamford requires 0.5 spaces per unit plus one parking space per doctor (it was assumed that there was 1 doctor for every 50 residents).
Horn was 0.34 parking spaces per unit. Parking surveys at the Ambassador of Scarsdale revealed a peak parking demand of 0.40 spaces per occupied bed\footnote{121 units out of 134 units were occupied at the time the parking survey was conducted.}, which is significantly lower than published rates.

After considering the results of the data outlined above, and per past discussions with the Commission, the parking requirements outlined within the proposed Draft MRCO Zone regulation have been written to provide parking for residents and visitors at a rate of 0.15 spaces per unit, plus an additional one (1) parking space for every employee present during the facility’s busiest operational period. Based on this standard, the proposed facility would be required to provide 21 spaces for residents and visitors (134 units x 0.15 = 20.1) and 40 additional spaces for staff, which equates to a total of 61 spaces. The project is designed to provide 80 total parking spaces, 63 spaces are standard parking spaces, 4 spaces are HC spaces and 13 spaces are tandem spaces that can be used for overflow parking, if needed, during busy visiting days, such as Mother’s Day\footnote{Tandem spaces will be used as assigned spots for staff only and will be managed by shift; Valet parking may be utilized for large events (anticipated to be less than 5 times per year).}. When using only the 67 regular/HC spaces provided, the proposed parking supply would equate to providing 1.675 spaces per employee and 0.5 spaces per unit, both of which exceed the averages found in the comprehensive parking analyses conducted by the applicant and its consultant team.

It should also be noted that the applicant encourages its staff to utilize public transportation as much as possible and will provide shuttle services to those employees who choose to commute to Greenwich by train.

Based on the above, the project traffic engineer has concluded that the parking requirements outlined in the proposed MRCO regulation, and those physically provided on the site, will be more than sufficient to meet the maximum parking demands at both the proposed facility and any future Managed Residential Community development.

**Traffic Impacts**

As noted above, the applicant retained Kimley-Horn, professional traffic engineers, to analyze potential traffic associated with the proposed development and prepare a Traffic Impact Study to evaluate both existing and future traffic operating conditions at the study intersection of Old Field Point Road and Old Track Road with and without the project. The results of the intersection analysis for the existing, “No-Build” and “Build” volume conditions for the peak hours are summarized in Table 3 of the Traffic Impact Study submitted herewith. In short, under future “Build” conditions (with the proposed project traffic added), the individual movements at the studies intersection will continue to operate at “No-Build” levels of service during all three (3) peak hours studied. Increases in eastbound and westbound movement delays will be imperceptible (0.5 seconds or less), while northbound movement delays are anticipated to increase by 3.8 seconds or less.

Based on the analysis provided herein, it is concluded that the increase in traffic volumes associated with the proposed development will not have a significant adverse impact on traffic operations at the study intersection or on the surrounding roadways. Further, the parking analysis reveals that the Project will have sufficient parking to accommodate the peak parking demand.

**Salient Zoning Statistics**

Salient zoning statistics for the proposed project are as follows:
<table>
<thead>
<tr>
<th></th>
<th>EXISTING</th>
<th>PROPOSED</th>
<th>PERMITTED / REQUIRED [Per MRCO Zone Unless Noted]</th>
<th>NOTES</th>
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<td><strong>ZONE:</strong></td>
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<td>GB-MRCCO</td>
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<td>110,398 SF</td>
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<td>Below Grade Terrace Level:</td>
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<tr>
<td>1&lt;sup&gt;st&lt;/sup&gt; Floor:</td>
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<td>28,153 SF</td>
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<td>0.888</td>
<td>0.891</td>
<td>Not to Exceed 0.9</td>
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<sup>³</sup> Per Proposed MRCO – Applicant to receive 0.05 additional FAR for every 25 spaces below grade. Tandem spaces, if provided shall be counted at a 50% rate. 77 below grade spaces – 50% of tandem spaces = 77 – 6.5 tandem spaces = 70.5 ÷ 25 = 2.82 x 0.05 = 0.141
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**Ambassador Greenwich - 0 Old Track Road – GB-MRCO Zone (cont.)**

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<th>EXISTING</th>
<th>PROPOSED</th>
<th>PERMITTED / REQUIRED NEW MRCO ZONE</th>
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<td>30 Memory Care Units</td>
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<td><strong>LOT COVERAGE:</strong></td>
<td>95.5%</td>
<td>47.4%</td>
<td>60%</td>
<td></td>
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<tr>
<td><strong>OUTDOOR RECREATION AREA:</strong></td>
<td>N/A</td>
<td>63,180 SF</td>
<td>40,200 SF [for 134 Units]</td>
<td>300 SF Per Unit</td>
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<tr>
<td><strong>SETBACKS:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front</td>
<td>44.9 Feet</td>
<td>20.6 Feet (Generator)</td>
<td>20 Feet</td>
<td></td>
</tr>
<tr>
<td>Side</td>
<td>65.3 Feet</td>
<td>39.0 Feet (min.)</td>
<td>20 Feet</td>
<td></td>
</tr>
<tr>
<td>Rear</td>
<td>0 Feet</td>
<td>20.5 Feet</td>
<td>0 Feet</td>
<td>Per §6-123(a)</td>
</tr>
<tr>
<td><strong>PARKING:</strong></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Overflow Parking</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Parking, Incl. Overflow:</td>
<td></td>
<td>80 Spaces</td>
<td>61 Spaces</td>
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**Proposed Drainage Improvements**

As outlined in the Drainage Summary Report prepared by the project engineer, Rocco V. D’Andrea, Inc., due to the site’s former use as a construction yard, over 95% of the property is currently covered by impervious surfaces. The redevelopment of the site, as outlined in the subject applications, will restore approximately 1.4 acres (52,300 SF) of hardscape with lawn or other landscaped areas, resulting in an overall reduction in impervious coverage when compared to existing conditions.

In addition, water quality treatment will be achieved through construction of a bioretention sand filter and installation of a hydrodynamic separator are proposed to treat stormwater. The sand filter, which will treat water at the rear half of the property, is designed to treat the Water Quality Volume (WQV) of its contributing onsite area and convey flows up to the 25-year storm without overtopping, including flows
from offsite uphill areas. The hydrodynamic separator, which is proposed to treat the front half of the property, is fed by roof drains and driveway catch basins, which could not be routed to the sand filter at the rear of the site due to grading. It is sized to treat the water quality flow of its contributing onsite area.

Based on the information provided above, and as detailed within the Drainage Summary Report dated July 15, 2021, the proposed development of the site will reduce total impervious coverage and provide treatment of runoff from new impervious surfaces. Accordingly, it is the professional opinion of the project’s civil engineer that the development of the site as proposed, including the implementation of the proposed stormwater management infrastructure, will have no adverse drainage impacts on neighboring or downstream properties, meet development criteria set forth in the Town’s Drainage Design Manual and comply with Section 6-15(a)(3)(g) and Section 6-17(d)(3) of the Greenwich Building Zone Regulations.

**Landscaping Improvements**

Development of the site will include planting efforts comprised of over 150 new trees, including both evergreen and deciduous species, and hundreds of new shrubs to enhance the landscape, stabilize grading work, improve function of the proposed bioretention basin and provide evergreen screening. The restoration of over 50% of the existing site from an impervious construction yard to green landscaped areas will provide a dramatic improvement to the site and the surrounding neighborhood.

New lighting fixtures will be installed along the driveway and adjacent to the building to make the site safe and enjoyable during evening hours. New lighting will be installed pursuant to Section 6-153 of the Building Zone Regulations, and will be shown in more detail on a photometric plan, that will be provided in the future under separate cover. Concept light fixtures and placement of same are illustrated on the Landscape and Lighting Plan submitted herewith.

In addition to the information provided above, the applicant has obtained a Right-of-Entry from the Department of Transportation (DoT) to plant and maintain evergreen trees within a portion of the railroad ROW (see EXHIBIT D). As shown on the Landscape and Site Lighting Plan submitted herewith, the 22-foot +/- strip, totaling approximately 0.47 acres, will be enhanced with additional landscaping and screening. Please refer to the Landscape and Lighting Plan submitted herewith for more information on the proposed plantings.

**Request for Special Permit Approval**

The Applicant seeks special permit approval pursuant to the following applicable regulations:

**Section 6-101(a) – Cubic Volume**

No new construction which would result in a structure or group of structures which individually or together would total in excess of 150,000 cubic feet in volume above established grade in the underlying GB zone shall be permitted except when authorized by special permit by the Commission pursuant to Sec. 6-17 of the Building Zone Regulations. The subject project will result in a structure that will exceed 150,000 cubic feet in volume and, accordingly, requires a special permit.

**(New) Section 6-115 – Managed Residential Community Overlay (MRCO) Zone**

Pursuant to proposed Sections 6-115(d)(1) and 6-115(d)(2), applications to re-zone a site to an MRCO zone, and any proposed improvements to a property which would create a Managed Residential Community development are subject to Special Permit procedures and standards pursuant to Section 6-17.
In addition, proposed Section 6-115(i) provides zoning incentives which may be authorized by the Commission subject to Special Permit procedures and standards and the special standards outlined in the MRCO zone regulation as outlined below. Due to the fact that the proposed regulation is new, we have restated the draft language below, followed by the applicant’s specific request based on the site plan submitted with these preliminary applications.

**Zoning Incentive Re: FAR and Building Area**

Due to the nature of a MRC facility being a residential use that has unique requirements for large communal indoor facilities, the Planning and Zoning Commission may permit a floor area ratio of up to 0.75 and a building area of up to 30%.

*Note: For all MRC facilities “Floor Area, Gross” shall not include any areas below grade, as defined in Section 6-134(b) of these regulations, regardless of use.*

Further, in order to encourage underground parking and an overall increase in greenspace on a particular site, the Commission may, on projects with a minimum lot area of one (1) acre and a parking requirement of twenty-five (25) or more parking spaces, provide an additional FAR bonus of 0.05 for every twenty-five (25) parking spaces provided below grade. Tandem parking spaces, if provided, may be counted at a 50% rate (i.e. 2 tandem spaces equate to 1 standard space). In no circumstance shall the overall development exceed 0.9 FAR.

The Applicant’s property is approximately 2.53 acres and requires approximately 61 parking spaces for the proposed use. This project therefore meets the minimum requirements to be afforded the FAR bonus noted above. The specific request being made by the applicant is use of a 0.888 floor area ratio. Based on the zoning regulation noted above and the number of below grade parking space provided in this application, a maximum FAR of 0.891 would be permitted under the new regulation.

With respect to building area, the applicant requests a building area of 27.3%, where a maximum of 30% may be authorized by the Commission.

**Zoning Incentive Re: Building Height and Number of Stories**

Under the proposed regulation, the Commission may permit a maximum building height of up to 47 ½ feet and up to four (4) stories provided that: The topography of the land provides site conditions that will support an increase in building height over that permitted in the underlying zone; and the building, at its increased height, is compatible with surrounding buildings and/or uses and will not be detrimental to a neighborhood or its residents.

The applicant requests authorization to construct a 47’-1 ¼”, 3 ½ story building. Due to the fact that this area of Old Track Road has historically been used by more industrial uses, mainly for mixing and storing propane gas and later for storage of construction materials, we believe the proposed residential facility will have a positive impact on the surrounding neighborhood. The topography of the site is such that the land to the west rises dramatically in elevation from approximately elevation 60 at the subject site
to elevation 90 at Spring Street, with homes sitting at a FFE of approximately 90+8. Due to this change in elevation, the surrounding residential neighbors look out over the site, which is currently quite unattractive, and to the train tracks. The building, as proposed, will be visible to its neighbors, but, in our view, the proposed building will provide a much more attractive view than currently exists and will provide effective noise mitigation from the nearby Metro-North Railroad and I-95 highway. This belief has been supported by many of the surrounding residential home owners, including Mr. Kyle Mill who provided the following testimony to the Commission at its July 14, 2020 meeting on this project’s pre-application:

“We are very, very happy that somebody would even consider developing the site that Amba is trying to develop. It's a very difficult site because there's a train track...I can't imagine a better use for this site that an assisted living community And I mean that with all of our heart, because we've lived through a lot of construction already on that site because of Eversource. So we are fully supportive as people who live beside this community of any development that needs to be done to improve this site...we look at it every day and we would have no problems even if it we're higher because quite honestly it would block the noise from the highway; so we support it at any height.” (Kyle Mill)

Based on the above, we believe that the topography of the land provides site conditions that will support the project increase in building height and that the building, at its increased height, will not only be is compatible with surrounding buildings and/or uses, but that it will be an improvement to the neighborhood over existing conditions.

Zoning Incentive Re: Setbacks

As provided in many of the provisions of the zoning regulations, the proposed MRCO regulation allows the commission to reduce the front, side and rear yards to not less than twenty (20) feet, subject nevertheless to the provisions of Section 6-123 of these Regulations.

The applicant proposes the following setbacks:

Front Yard: 20.6 Feet (min.) to the proposed generator
         29.4 Feet (min.) to the proposed building

Side Yard: 39.0 Feet (min.)

Rear Yard: 20.5 Feet (min)
Note: Section 6-123(a) - No rear yard shall be required on any lots which adjoins a railroad right of way or municipally owned parking area.

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8The project engineer worked on 18 Stone Avenue, which overlooks the proposed landscaped area of the subject site. This home has a first-floor elevation of 104’. The “Viewstone Townhomes”, which will overlook the proposed building, have a first-floor elevation of approximately 90-102 based on GIS data.
All areas of the site adjacent to a property boundary will be landscaped and provide screening for all abutting properties. Please refer to the Landscape and Site Lighting Plan submitted herewith for more information on proposed plantings.

Conformance with Section 6-15, Site Plan Standards, and 6-17, Special Permit Standards

In making its decision to grant or deny an application for Special Permit, the Commission is required to consider whether a proposed project will comply with the specific standards outlined under Section 6-17(d) of the Building Zone Regulations. Outlined below are each of the twelve (12) standards enumerated in the aforementioned regulation, followed by commentary regarding the same:

[Note: Many of the standards listed below are consistent with the standards set-forth in Section 6-15, Site Plan Standards. As such, the standards of Section 6-15 have not been repeated below, but are referenced for review purposes.]

1.) The proposed development shall not prevent or inhibit the orderly growth of the retail development of the area.

Comment: The proposed development will not prevent or inhibit the orderly growth of the retail development of the area, but is proposed in a zone and location that is in close proximity to the Town’s prime retail center, which will promote use of the Town’s retail shops and services located along Greenwich Avenue and the surrounding streets.

2.) The proposed development shall not adversely affect storm drainage, sewerage disposal or other municipal facilities. [Reference to Section 6-15(a)(2)]

Comment: As outlined above and evidenced by the support documentation submitted herewith, the proposed development meets the standards outlined within the zoning regulations with respect to stormwater management, as well as the standards set forth in the Town’s Drainage Manual. The proposed site development will reduce impervious coverage on the site and the proposed stormwater management plan will provide treatment, collection and infiltration of stormwater to improve water quality volumes. Sewage disposal and potable water will be provided through public facilities and will be established in accordance with all applicable state and local regulations.

3.) The proposed development shall not materially adversely affect adjacent areas located within the closest proximity to the use. [Reference to Section 6-15(a)(2) and (3)]

Comment: The proposed development will not materially adversely affect adjacent areas located within the closest proximity to the use/site. As noted above, we believe that the proposed development will enhance the area with: a.) an architecturally sensitive building, inspired in Shingle Style architecture and designed by the preeminent architectural firm, Perkins Eastman; b.) a significant increase in green space over existing conditions; and c.) an aesthetically pleasing planting plan that will introduce a variety of trees and shrubs to the landscape.

4.) The proposed development shall not materially obstruct significant views which are important elements in maintaining the character of the Town for the purpose of promoting the general welfare and conserving the value of buildings. [Reference to Section 6-15(a)(2)]

Comment: The proposed development will not materially obstruct significant views, which are important elements in maintaining the character of the Town. The new building architecture will
provide, in our opinion, a more pleasing view than the current site offices and will assist in obstructing certain existing views of train tracks and highway beyond.

5.) **The proposed development shall preserve or enhance important open space and other features of the natural environment and protect against deterioration of the quality of the environment, as related to public health, safety and welfare. [Reference to Section 6-15(a)(2)]**

**Comment:** The proposed site plan does not propose any development that would adversely affect open space or the deterioration of the environment as related to public health, safety and welfare. Construction of the proposed building and use is consistent with the goals of the 2019 POCD and will be in compliance with all Zoning Regulations, as amended, as well as with current building, electrical and fire safety codes. The project will reduce impervious coverage on the site and includes environmentally friendly building design and site elements that will improve the quality of the micro-environment.

6.) **The proposed development shall not interfere with pedestrian circulation, most particularly related to retail shopping. [Reference to Section 6-15(a)(1)]**

**Comment:** The proposed development will not interfere with pedestrian circulation or affect pedestrian circulation in areas relative to retail shopping.

7.) **The proposed development shall not adversely affect safety in the streets nor increase traffic congestion in the area so as to be inconsistent with an acceptable level of service or interfere with the pattern of highway circulation. [Reference to Section 6-15(a)(1)]**

**Comment:** As noted above, the proposed development will not adversely affect safety in the streets nor increase traffic congestion. Formal parking will be provided in sufficient numbers to accommodate residents, staff and visitors. In addition, and as demonstrated in the Traffic Impact Study submitted herewith, the proposed improvements will not significantly increase traffic volumes in the area. Any minimal increase in traffic delay at the surrounding intersections will be less than four (4) seconds and be “imperceptible” to motorists.

8.) **The proposed development shall be in scale with and compatible with surrounding uses, buildings, streets and open spaces. [Reference to Section 6-15(a)(3)]**

**Comment:** The proposed development is situated in a commercial area, zoned for a mix of uses. The building will be compatible with the surrounding multi-family residential structures, including the JLofts Greenwich Apartments located at 16 Old Track Road. As noted above, the building and its surrounding landscaping will improve the area and be in scale with the surrounding uses based on existing buildings within the neighborhood and the site’s surrounding topography. We look forward to reviewing this project with both the Greenwich Planning and Zoning Commission and its Architectural Review Committee to discuss the building’s architecture and how we believe it will enhance the surrounding neighborhood.

9.) **The proposed development shall preserve land, structures or features having special historical, cultural or architectural merit. [Reference to Section 6-15(a)(3)]**

**Comment:** The existing site does not contain any land, structures or features that have special historical, cultural or architectural merit. Accordingly, the above standard is not applicable.
10.) The proposed development shall not materially adversely affect residential uses, nor be detrimental to a neighborhood or its residents, nor alter a neighborhoods essential characteristic. [Reference to Section 6-15(a)(3)]

Comment: The project will introduce a residential use to a site that has been used for the better part of a century as a storage yard. For the reasons outlined above, the proposed development will be compatible with the more recent developments approved for Old Track Road and, overall, have a positive impact on the surrounding neighborhood. When taken as a whole, the redevelopment prosed herewith reflects a significant upgrade to the existing property and will provide much needed assisted living facilities that will support today’s market.

11.) The proposed development shall preserve where possible existing housing stock so as to maintain and contribute to a diversity of housing opportunities in Town.

Comment: The existing development will increase the Town’s housing stock by 134 units and satisfy a desperate need within Greenwich for elderly housing.

12.) For the establishment of horticultural or wildlife reservations and natural park areas acquired or controlled by a Connecticut non-profit corporation or organization provided that such reservation or area is open to the public, subject to reasonable regulation, and the Planning and Zoning Commission finds that the establishment of such reservation or area is in the interest of the Town for educational, scientific and recreational reasons, having in mind the size, character and location of such premises and availability of similar uses in the vicinity.

Comment: Section 6-17(d)(12) is not applicable to the subject project.

In addition to the standards outlined above, the proposed MRCO regulation includes two (2) additional special permit standards that the Commission must consider when approving a Managed Residential Community Development that has requested use of the zoning incentives outlined in Section 6-115(j) of the proposed regulation:

Section 6-115(j)(B) - The proposed development must provide sufficient landscaping, planting and screening to support any additional massing permitted over that of the underlying zone; and

Section 6-115(j)(C) - The quality of architecture, landscape treatments, and the density and scale of the MRC development must be compatible with adjacent buildings, surrounding land use development, and the general neighborhood context.

Comment: The applicant is fortunate to have on its team Mr. L. Bradford Perkins, the founder, Chairman and CEO of Perkins Eastman Architects, a large architectural firm based in New York City with 15 offices in the US and overseas. Mr. Perkins is a Fellow of the American Institute of Architects, a member of the Royal Architectural Institute of Canada, and a member of the American Institute of Certified Planners. He has worked on projects throughout the US and 30 countries around the world and is particularly well known for his work in senior living and healthcare building design, designing over 100 Senior Living and Care Facilities. Mr. Perkins is the author of eight textbooks and over 100 articles in professional journals and he is on the faculty of Cornell’s College of Art, Architecture, and Planning. One of Mr. Perkins’ books, entitled Building Type Basics for Senior Living, Second Edition, was previously provided to the Commission as a resource for the Town’s initiative in providing more housing opportunities for Greenwich’s aging population. Mr. Perkins’ expertise in designing senior
housing, coupled with the developers experience in building high-end senior living facilities will ensure that the proposed building is of the highest quality. The project is intended to provide luxury senior living opportunities to residents who wish to maintain their quality of life while also receiving the assistance they need with day-to-day activities.

In addition to the topographic advantage that this site has to support the proposed increasing in massing over that normally permitted in the underlying GB zone, landscaping along both the eastern and western portions of the property will provide screening for adjacent property owners. The landscape plan proposed herewith will ultimately include hundreds of trees, shrubs and grasses. The 20+ foot landscape screen proposed along the eastern side of the property will screen the unsightly train tracks and highway from not only the residents of this development, but also provide screening for the residential neighbors on Spring Street and Stone Avenue. Wandering paths, fountains and other enhancements are also proposed within the landscape to encourage use of the site’s green spaces by residents and their guests.

In sum, we believe that this project will comply with the specific standards outlined under Section 6-17(d), 115(h)(4) (new), and 115(j) (new) of the Building Zone Regulations; will satisfy the Town’s goal, as outlined in the 2019 POCD, of creating regulations to support assisted living developments; and will assist the Town in providing senior housing, which is a well-documented need within the Greenwich community.

Additional Approvals Required

In addition to Final Site Plan and Special Permit Approval by the Planning and Zoning Commission, review and approval of the proposed development will be required by the Architectural Review Committee.

As reflected by the attached copy of the IWWA’s Questionnaire, staff of the Inland Wetlands and Watercourses Agency has acknowledged that no Permit or Approval from the Agency will be required for the proposed improvements.

Support Documents

In accordance with the Commission’s Site Plan Checklist, the following documents are submitted herewith in support of these Applications:

- One (1) Electronic Copy of this Zoning Narrative;
- One (1) Electronic Copy, Preliminary Site Plan Application Form dated July 19, 2021;
- One (1) Electronic Copy, Special Permit Application Form dated July 19, 2021;
- One (1) Electronic Copy, Applicant/Agent Signature Form;
- One (1) Electronic Copy, Applicant/Agent Signature Form;
- One (1) Electronic Copy, Application Fee Check in the amount of 7,830.00, check payable to the Town of Greenwich. The Filing Fee was calculated as follows:
  - Zoning Text Amendment: $1,090
  - Re-Zoning (Map Change): $1,090
  - Preliminary Site Plan: $4,500
  - Special Permit: $1,090
  - State Fee: $60
  - Total: $7,830
• One (1) Electronic Copy. Affidavit of Notification to Adjoining Property Owners, inclusive of a Proof of Mailing;

• One (1) Electronic Copy, Sets of Survey and Civil Engineering Plans dated July 15, 2021, prepared and certified by Rocco V. D’Andrea, Inc.;

• One (1) Electronic Copy, Map showing PROPOSED AMENDMENT TO BUILDING ZONE REGULATION MAP FROM GB TO GB-MRCo, 1” = 400’ Scale;

• One (1) Electronic Copy, Architectural Plan Set inclusive of floor plans, elevations, and FAR worksheets dated July 16, 2021, prepared and certified by Perkins Eastman;

• One (1) Electronic Copy, Landscape Plan Set dated July 19, 2021, prepared by RGR Landscape Architecture & Architecture, PLLC;

• One (1) Electronic Copy, Proposed Grade Plane dated July 9, 2021, prepared and certified by Rocco V. D’Andrea, Inc.;

• One (1) Electronic Copy, Drainage Summary Report and all associated Drainage Forms dated July 15, 2021, prepared and certified by Rocco V. D’Andrea, Inc.;


• One (1) Electronic Copy, IWWA Greensheet Questionnaire, signed by Agency staff on June 6, 2021;

• One (1) Electronic Copy, Town GIS Map of subject property;

• One (1) Electronic Copy, Tax Assessors Field Card for Parcel #11-1137/S;

• One (1) Electronic Copy, The Planning and Zoning Department’s Site Plan Checklist; and

One (1) hard copy of documents listed above will be submitted to the Planning and Zoning Department’s Applications Coordinator within the next few business days. Should you or your staff have any questions or comments during your review, please do not hesitate to contact me at 203.629.7330.

Very truly yours,

Bruce F. Cohen

cc: (w/enc.): Renamba Greenwich LLC
Perkins-Eastman
Rocco V. D'Andrea, Inc.
Kimley-Horn
RGR Landscape Architecture & Architecture, PLLC
EXHIBIT A
Sec. 6-115. MANAGED RESIDENTIAL COMMUNITY OVERLAY ZONE (MRCO):

(a) Purpose

The purpose of the Managed Residential Community Overlay Zone (MRCO) is to encourage the development of age-friendly housing options that provide “Assisted living services” to broaden the range of housing and health care options for Greenwich’s increasing elderly population. The MRCO is designed to encourage such housing developments in close proximity to commercial centers and provide attractive congregate housing for elderly residents within the context of the Town’s predominantly residential character.

(b) Definitions:

The following definitions are applicable to an MRCO:

(1) Activities of daily living - Pursuant to Section 19a-693 of the Connecticut General Statutes, “Activities of daily living” shall mean activities or tasks that are essential for a person’s healthful and safe existence, including, but not limited to, bathing, dressing, grooming, eating, meal preparation, shopping, housekeeping, transfers, bowel and bladder care, laundry, communication, self-administration of medication and ambulation.

(2) Assisted living services - Pursuant to Section 19a-693 of the Connecticut General Statutes, “Assisted living services” shall mean nursing services and assistance with activities of daily living provided to residents living within a managed residential community having supportive services that encourage persons primarily fifty-five years of age or older to maintain a maximum level of independence.

(3) Building Area - For all Managed Residential Community (MRC) facilities “Building Area” shall be defined as outlined in §6-5(a)(7) except as follows:

A. That portion of the area of a building or structure whose roof is treated as ground surface (planted or paved) and is entirely below the elevation of the adjacent grade by at least one (1) foot of friable fill, as it was prior to any construction or regrading shall not be included in “Building Area”. However, such area shall be included in the site’s overall lot coverage unless said area is below the elevation of the adjacent grade by at least three (3) feet of friable fill.

B. The portion of the area of a structure or building whose floor is below the average established grade of the street curb in front of the building shall not be included in Building Area nor included in the floor area and may encroach within the required setbacks if it complies with all of the following conditions:

   i. At least 60% of the roof surface of such structure or building shall have sufficient earth to support natural vegetation and be planted with grass, ground cover or shrubs.

   ii. The maximum grade of said roof shall not exceed one foot of rise to three feet of run.
iii. The maximum height of any wall of said structure within a required setback shall not exceed 30 inches above the grade at all street curbs at any point, except that cross walls starting from said maximum 30 inch height may follow the slope of an earth covered roof.

iv. A below grade structure shall not affect the computation of building height, except that the roof surface may be considered finished ground surface if it complies with all the provisions of the building height definition of these regulations.

(c) Location:
(1) To promote multifamily elderly housing within close proximity to the Town’s existing commercial centers and within an area of the Town which can provide the necessary infrastructure to support such development, such as, but not limited to, road network, water supply, storm drains, sewage disposal, etc., a MRCO may be located in any GB or GBO zone.

(2) No Managed Residential Community facility shall be allowed on parcels which are within the Flood Plain District or designated by the Federal Emergency Management Agency as either a special flood hazard area or a floodway.

(d) Procedure:
(1) Creation of an MRCO requires approval from the Planning and Zoning Commission for a zone change. Any accompanying improvements to the MRCO property require site plan and special permit applications.

(2) An application to rezone a site to a MRCO shall be submitted in conjunction with site plan and special permit applications, or pre-applications, as applicable, in accordance with Section 6-13-6-15 of these regulations, and shall be subject to Special Permit procedures and standards pursuant to Section 6-17.

(e) Use Regulations:
(1) The principal permitted use within a MRCO shall be congregate housing within a managed residential community which provides assisted living services; such uses shall comply with all requirements and limitations as adopted by the Connecticut Department of Public Health, as amended from to time.

(2) Accessory uses permitted within a MRCO shall include:

A. Non-Residential common uses, limited and essential for the exclusive use and needs of the occupants, such as recreation rooms, housing management office when contained within a principal building, maintenance, storage space, common dining and food preparation facilities and central laundry facilities.

B. Management and operational offices when contained within a principal building and directly related to the MRC.
Parking

(1) Parking shall be provided for a MRC as follows:

A. Parking for residents and visitors shall be provided at 0.15 spaces per unit.

B. In addition to the parking required under Section 6-115(f)(1)(A) above, one (1) parking space for every employee shall be provided. Employee parking shall be based on the number of employees present during the busiest shift.

C. In an MRCO zone, required handicapped parking may be included in the parking requirements as set forth in these standards. Tandem parking spaces, if provided, shall be considered overflow parking and shall not be included in the minimum parking requirements outlined herein.

D. Notwithstanding the provisions of Section 6-115(f)(1)(A) through 6-115(f)(1)(C) above, the Commission, in order to accomplish the purpose of this Section, may reduce the amount of required parking if pooled or valet parking is implemented pursuant to Section 6-162 of these Zoning Regulations.

Density, Size, and Type of Dwelling Units Permitted:

(1) The maximum number of dwelling units permitted within a MRC development shall be determined by requiring 750 square feet of land area for each unit.

(2) The dwelling units may be studio, one bedroom or two bedrooms. Each unit shall contain a full bathroom and may contain a small kitchenette.

(3) The square footage of the individual private residential units in an MRC facility shall be not less than 450 square feet per unit with one (1) or more bedrooms. Studio units and memory care units may be smaller, but not less than 275 SF per unit.

Special Requirements: An MRC Facility must meet the following standards and requirements:

(1) Any development approved by the Commission under the provisions of the MRCO shall meet the definition of a "managed residential community" and provide "assisted living services" as defined herein and by Section 19a-693 of the Connecticut General Statutes. In addition, the agency or agencies that provide such services, (i.e. the "assisted living services agency" or "ASLA") must be licensed by the Connecticut Department of Public Health ("DPH") pursuant to chapter 368v and managed in accordance with all applicable provisions of the Connecticut General Statutes and regulations of the DPH, as may hereafter be amended. Copies
of all documents required to be filed with the DPH under said regulations shall be filed simultaneously with the Commission and the Greenwich Commission on Aging.

(2) Any development approved under the MRCA shall be connected to public sanitary sewers and served by public water supply.

(3) Any development approved under the MRCA shall include at least all of the following services and facilities:

A. Regularly scheduled meal service for three (3) meals per day;
B. Regularly scheduled laundry service for personal laundry and linens;
C. Regularly scheduled transportation for personal shopping, social and recreational events, health care appointments and similar needs;
D. Regularly scheduled housekeeping services;
E. Maintenance for tenants' living units, including chore services for routine domestic tasks that the tenant is unable to perform;
F. Programs of social and recreational opportunities;
G. A formally established program that provides tenants with twenty-four (24) hour a day security designed to protect tenants from intruders;
H. An emergency call system in each living unit;
I. On-site washers and dryers sufficient to meet the needs of the tenants; and
J. Interior common use space that is sufficient in size to accommodate fifty percent (50%) of the tenant population.

(4) In addition to complying with the standards set forth in Section 6-15 and 6-17 of these regulations, the site plan shall provide for the needs of its residents including, but not limited to:

A. Grading of areas accessible to residents shall have a slope no greater that 5%, and shall, in all other respects, be accessible to the residents as determined by the Americans with Disabilities Act and its requirements.
B. Provisions for a van drop off area and parking space for the van located at the main entry for the convenience of residents.
C. Access to loading spaces shall be designed so as not to interfere with normal traffic, and such spaces shall be screened.
D. Outdoor recreational space designed for use by typical assisted living residents shall be provided at no less than 300 SF per unit, with a minimum of 2,000 sq. ft. landscaped. Benches, paved walkways, and appropriate site lighting shall be provided and such area(s) shall be shielded from heavy traffic. No less than 50% of the total area of such space shall be contiguous.
Natural features and specimen trees should be preserved or provided in these areas. The land so set aside shall be graded and landscaped, shall be of a passive recreation nature suited to the needs of the residents. Such outdoor recreation areas shall be designed to provide security and privacy to residents and programs of social and recreational opportunities. Screening and planting requirements shall be in accordance with Sections 6-180 and 6-181 of these Regulations and as may be additionally required by the Planning and Zoning Commission.

(i) Incentives:

To meet the recognized community need to provide elderly housing opportunities that will allow elderly residents to remain within the Greenwich community and to meet the needs of the aging population, the Planning and Zoning Commission may provide the following zoning incentives to create a MRC development (including alteration of, or addition to, an existing building):

(1) Due to the nature of a MRC facility being a residential use that has unique requirements for large communal indoor facilities, the Planning and Zoning Commission may permit a floor area ratio of up to 0.75 and a building area of up to 30%.

A. For all MRC facilities “Floor Area, Gross” shall not include any areas below grade, as defined in Section 6-134(b) of these regulations, regardless of use.

(2) In order to encourage underground parking and an overall reduction in coverage and thereby encourage increased landscaping, for projects with a minimum lot area of one (1) acre and that require twenty-five (25) or more parking spaces, an FAR bonus of 0.05 may be applied for every twenty-five (25) parking spaces provided below grade. Tandem parking spaces, if provided, may be be counted at a 50% rate (i.e. 2 tandem spaces equate to 1 standard space). In no circumstance shall the overall development exceed 0.9 FAR.

(3) The Commission may permit a maximum building height of up to 47 ½ feet and up to four (4) stories provided that:

A. The topography of the land provides site conditions that will support an increase in building height over that permitted in the underlying zone; and

B. The building, at its increased height, is compatible with surrounding buildings and/or uses and will not be detrimental to a neighborhood or its residents.

(4) Front, side and rear yards may be reduced to not less than twenty (20) feet, subject nevertheless to the provisions of Section 6-123 of these Regulations.

(i) Special Permit Standards for Authorization to Use Zoning Incentives

The above incentives are dependent on the Commission making a finding that:
A. The development complies with the standards of Sec. 6-15, 6-17 and 6-115(h)(4) of the Building Zone Regulations;

B. The proposed development provides sufficient landscaping, planting and screening to support any additional massing permitted over that of the underlying zone; and

C. That the quality of architecture, landscape treatments, and the density and scale of the MRC development are compatible with adjacent buildings, surrounding land use development, and the general neighborhood context.
EXHIBIT B
Staff and Parking Comparisons for Assisted Living/Memory Care Communities

Ambassador of Greenwich

The following represents a comparison among several existing Assisted Living and Memory Care Facilities in CT and NY, including the Ambassador of Scarsdale. It also includes some facilities that also have Independent Living residences. The information requested by Greenwich was to compare the staff complement to the parking provided. The staff numbers we will be showing will represent the main daytime shift, from 7 am to 3 PM, which has the largest number of staff.

### PROPOSED

<table>
<thead>
<tr>
<th>Ambassador of Greenwich, CT</th>
<th>Site Area: 2.5344 Acres (110,398.5 GSF)</th>
<th>Parking Spaces provided: 84 Standard 4 HC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assisted Living Units: 112</td>
<td>Staff/Largest Shift: 40</td>
<td>Parking Ratio: 1.6 spaces per employee*</td>
</tr>
<tr>
<td>Memory Care Units: 30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Units</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>*Not including tandem spaces</td>
<td></td>
</tr>
</tbody>
</table>

### COMPARABLE FACILITIES

<table>
<thead>
<tr>
<th>Ambassador of Scarsdale, NY</th>
<th>Site Area: 6.32 Acres (275,299 gsf)</th>
<th>Parking Spaces provided: 43</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assisted Living Units: 93</td>
<td>Staff/Largest Shift: 45</td>
<td>Parking Ratio: 0.95 spaces per employee</td>
</tr>
<tr>
<td>Memory Care Units: 22</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Units</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Maplewood at Southport, CT</th>
<th>Site Area: 11.3 Acres (490,788 gsf)*</th>
<th>Parking Spaces provided: 60</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assisted Living Units: 66</td>
<td>Staff/Largest Shift: 35</td>
<td>Parking Ratio: 1.7 spaces per employee</td>
</tr>
<tr>
<td>Memory Care Units: 32</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Units</td>
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<td></td>
</tr>
</tbody>
</table>

*Calculated using Google Earth

<table>
<thead>
<tr>
<th>Maplewood Stony Hill (Bethel) CT</th>
<th>Site Area: 5.92 Acres (257,875 gsf)</th>
<th>Parking Spaces provided: 46</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assisted Living Units: 54</td>
<td>Staff/Largest Shift: 35</td>
<td>Parking Ratio: 1.3 spaces per employee</td>
</tr>
<tr>
<td>Memory Care Units: 30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Units</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Sunrise at Fairfield, CT</th>
<th>Site Area: 5.2 Acres (226,730 gsf)</th>
<th>Parking Spaces Provided: 50</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assisted Living Units: 53</td>
<td>Staff/Largest Shift: 40</td>
<td>Parking Ratio: 1.25 spaces per employee</td>
</tr>
<tr>
<td>Memory Care Units: 29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Units</td>
<td></td>
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</tbody>
</table>
EXHIBIT D
This sketch is compiled from other maps, deeds, and/or other sources of information; it is not to be construed as having been prepared from an accurate survey and is subject to changes that an accurate survey may disclose.

This sketch is an estimate only and not to scale.

Marisa,

Yes please add that to the current record. I need to look at all of the new information but it just doesn’t seem right. I watched while they did the traffic study and one of the wires that crossed the street broke and was on the side of the road for days. And I do not believe that 40 people (pg 6 of zoning narrative) during 7am to 5pm will run the facility. That includes nurses, staff, administrative, groundskeepers, 2 restaurants feeding 130 patients 3 times a day, laundry, activities, barbers, etc. At 5pm they said 40 people leave and 30 come in. Therefore the traffic study saying only 51 new peak pm trips will be added is flawed. Doesn’t pass the smell test.

I appreciate all your help Marisa, I’m sure you have better things to do. Have a nice night.

Steve

Hi Steve,

Would you like the below excerpt to be made part of the current record? If so, yes, I can forward your comments to the Commission and the comments will become part of the file. Or are there other comments that you submitted in 2020 – if so, those would not automatically be included in the new file. Thank you,

Dear Katie:

I have concerns concerning the planned assisted living facility (ALF) at the end of Old Track Road. If you remember the rejection of the proposed Lexus repair facility and parts distribution center on Old Track Road a few years ago there were two main concerns if I remember correctly. The first was the increase in traffic and the second was that it didn’t meet the town charter concerning the structure being used primarily for town
residents.

The J-Lofts were built after the Lexus project was denied. That means they have added about 130 residents plus visitors, deliveries, security, staff and maintenance. Building a 130,000 square foot building down the street will add a minimum of 400 additional cars per day for employees, deliveries, visitors, van trips to town, etc.. That is at a minimum 600 trips up and 600 trips down the street daily between J-Lofts and ALF alone. That does not including car dealer and Equinox traffic which is substantial.

I am also curious how they can support the need for an additional 130 rooms when the total existing units in Greenwich is just over 150 rooms. Are they forecasting our ALF needs will almost double? I fail to understand how this facility is being built primarily for Greenwich residents.

I am not against a ALF but I am against something of this size and scope and all of the residual effects that come with it. If it were maybe half this size I would be more agreeable.

Marisa Anastasio, Senior Planner
Town of Greenwich Planning and Zoning
101 Field Point Road
Greenwich, CT 06830
Ph. 203-622-7894
Fax 203-861-6102

From: steve@gatehousepartners.com [mailto:steve@gatehousepartners.com]
Sent: Tuesday, August 3, 2021 2:57 PM
To: Anastasio, Marisa <Marisa.Anastasio@greenwichct.org>
Subject: RE: Online Form Submittal: Contact Us

[EXTERNAL]
Thank you Marisa. Last time I did this Katie sent me an email and said, “Thank you for your comments. I will forward them to the applicant. I do not believe we have a pending application in the office at the moment but at least they will have your comments. If and when they do submit a final site plan, please make sure to comment again so that your comments are in the official record”. Will you make the comments from last December part of the official record?
Steve
Hello Mr. Ditri,

Thank you for your email. I have included a links to the recently submitted applications for the 0 Old Track Road property. Please note the linked expire within 7 days so please download any documents you would like to retain. The project is tentatively scheduled for review at the Sept. 14th P+Z meeting. Please let us know if you have questions on these applications. Thank you,

Site Plan application:
0 Old Track Road PLPZ202100329 application submittal

Text Amendment application:
PLPZ202100330

Zoning Amendment application:
PLPZ202100331

Marisa Anastasio, Senior Planner
Town of Greenwich Planning and Zoning
101 Field Point Road
Greenwich, CT 06830
Ph. 203-622-7894
Fax 203-861-6102
Good afternoon,

Back on 12/12/2020 I contacted your office concerning the proposed construction of a Managed Residential Community at 0 Old Track Road. At that time I opposed the project on a number of issues. I am wondering if the proposal changed from the initial size and scope. How can I receive a copy of the preliminary application? Copied below is the email I wrote back in December.

Thank you,
Steve

Dear Katie:

I have concerns concerning the planned assisted living facility (ALF) at the end of Old Track Road. If you remember the rejection of the proposed Lexus repair facility and parts distribution center on Old Track Road a few years ago there were two main concerns if I remember correctly. The first was the increase in traffic and the second was that it didn’t meet the town charter concerning the structure being used primarily for town residents.

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