

**FINAL**

**ENVIRONMENTAL ASSESSMENT FOR  
APPROVAL OF THE  
CONNECTICUT TRAINING CENTER  
REAL PROPERTY MASTER PLAN**

**CONNECTICUT ARMY NATIONAL GUARD**



**July 2019**

**Connecticut Army National Guard  
360 Broad Street, Hartford CT 06105  
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## ENVIRONMENTAL ASSESSMENT ORGANIZATION

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The Connecticut Army National Guard (CTARNG) prepared a Real Property Master Plan (RPMP) for the Connecticut Training Center (CTC) consistent with the requirements of the US Department of Defense (DoD) Unified Facilities Criteria (UFC) 2-100-01, *Installation Master Planning*, which provides guidance for developing RPMPs for DoD installations. This Environmental Assessment (EA) evaluates the potential environmental, socioeconomic, and cultural effects of approving the UFC 2-100-01-compliant RPMP.

As required by the National Environmental Policy Act of 1969 (NEPA) (Title 42 of the *United States Code* [USC] § 4321 *et seq.*); implementing regulations issued by the President's Council on Environmental Quality (CEQ), Title 40 of the *Code of Federal Regulations* (CFR) §§ 1500–1508; 32 CFR Part 651, *Environmental Analysis of Army Actions*; and the Connecticut Environmental Policy Act (CEPA), the potential impacts of the Proposed Action and a No Action Alternative are analyzed in this document. This EA will facilitate the decision-making process by the CTARNG regarding the Proposed Action and alternatives that have been considered and is organized as follows:

- **EXECUTIVE SUMMARY:** Describes the Proposed Action and its considered alternatives; summarizes environmental, cultural, and socioeconomic consequences; and compares potential impacts associated with the alternatives considered by CTARNG, including the No Action Alternative.
- **SECTION 1.0 PURPOSE OF AND NEED FOR THE PROPOSED ACTION:** Summarizes the purpose of and need for the Proposed Action, provides relevant background information, and describes the scope of the EA. This section also includes information on public and agency involvement.
- **SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES:** Describes the process CTARNG used to develop the Proposed Action and alternatives, the No Action Alternative, and the alternatives eliminated from further consideration.
- **SECTION 3.0 AFFECTED ENVIRONMENT:** Describes relevant components of the existing environmental, cultural, and socioeconomic setting within the Region of Influence (ROI) of the alternatives considered.
- **SECTION 4.0 ENVIRONMENTAL CONSEQUENCES:** Identifies individual and cumulative potential environmental, cultural, and socioeconomic effects of implementing the alternatives considered. This section also identifies proposed mitigation measures.
- **SECTION 5.0 COMPARISON OF ALTERNATIVES AND CONCLUSIONS:** Compares the environmental impacts of the alternatives considered, summarizes the significance of potential individual and cumulative impacts from the alternatives, and documents the conclusion that an Environmental Impact Statement (EIS) is not required.
- **SECTION 6.0 REFERENCES:** Provides bibliographical information for all sources cited in the EA.
- **SECTION 7.0 LIST OF PREPARERS:** Identifies document preparers, their roles or areas of responsibility, and their years of relevant experience.
- **SECTION 8.0 AGENCIES AND INDIVIDUALS CONSULTED:** Lists agencies and individuals contacted for data and information during preparation of this EA.
- **APPENDICES:** Include copies of scoping letters sent to the parties listed in **Section 8.0** and copies of public notices published to announce availability of the Final EA for public review.

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- ✓ **Project Name:** *Environmental Assessment for Approval of the Connecticut Training Center Real Property Master Plan*
  - ✓ **Funding Source:** MILCON
  - ✓ **Proponent:** Connecticut Army National Guard
  - ✓ **Fiscal Year (FY):** FY19

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## ENVIRONMENTAL ASSESSMENT SIGNATURE PAGE

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**LEAD AGENCY:** National Guard Bureau  
**COOPERATING AGENCIES:** None  
**TITLE OF PROPOSED ACTION:** Approval of the Connecticut Training Center Real Property Master Plan  
**AFFECTED JURISDICTIONS:** East Lyme, Lyme, Old Lyme, and East Haven, Connecticut  
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**DOCUMENT DESIGNATION:** Final Environmental Assessment

**ABSTRACT:** The CTARNG prepared an RPMP for the CTC consistent with the requirements of DoD UFC 2-100-01, which provides guidance for developing RPMPs for DoD installations. The CTC comprises three installations—Stones Ranch Military Reservation (SRMR), Camp Niantic, and East Haven Rifle Range (EHRR)—all of which are in southern Connecticut. In accordance with Federal and State law and Army Regulations, the CTARNG prepared an EA to evaluate the potential environmental impacts of approving the UFC 2-100-01-compliant RPMP. The CTC RPMP is needed to comply with DoD Master Planning policy as well as to guide the CTARNG through the long-term development of the CTC in a clear, sustainable manner that supports the installations' military missions.

This EA evaluates the direct, indirect, and cumulative impacts of approving the RPMP (the Proposed Action) and the No Action Alternative, with respect to the following resource topics: land use; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; infrastructure; and hazardous and toxic materials and waste. This EA concludes that *no significant adverse impacts* would result from approving the RPMP, either individually or cumulatively, on the human or natural environment as a result of implementing the Proposed Action.

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## EXECUTIVE SUMMARY

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The CTARNG prepared an RPMP for the CTC consistent with the requirements of DoD UFC 2-100-01, *Installation Master Planning*, which provides guidance for developing RPMPs for DoD installations (DoD 2012). This EA evaluates the potential environmental, socioeconomic, and cultural effects of the Proposed Action, which is approving the UFC 2-100-01-compliant RPMP, and the No Action Alternative. The Proposed Action is the CTARNG's Preferred Action Alternative and has been prepared in accordance with NEPA, CEQ implementing regulations for NEPA in 40 CFR Part 1500–1508, 32 CFR Part 651, and *The Army National Guard NEPA Handbook* (ARNG 2011).

### Purpose of and Need for the Proposed Action

In accordance with the 28 May 2013 Office of the Secretary of Defense (OSD) memorandum concerning installation master planning (OSD 2013), the Army National Guard (ARNG) issued a memorandum to the ARNG Construction and Facility Management Officers in December 2015, outlining requirements for preparing UFC 2-100-01-compliant RPMPs for 48 specified training installations by 1 October 2018 (ARNG 2015). The CTARNG prepared the CTC RPMP to incorporate the vision of the CTARNG Adjutant General and the facility requirements of all units and organizations assigned to or supported by the CTC. The purpose of the Proposed Action is to consider the long-term mission requirements and major development and training projects proposed for execution over the next 20 years that would further meet the requirements and support CTARNG missions. The CTARNG will accomplish this by approving the RPMP.

The CTC RPMP is needed to comply with DoD Master Planning policy as well as to guide the CTARNG through the development of the CTC in a clear, sustainable manner that supports the CTC's current missions, preserves long-term military capabilities, supports the DoD's mission, and enriches the community it serves. Additionally, the format and standards prescribed by UFC 2-100-01 ensure that CTARNG's installation planning is consistent with other DoD components and uses the latest techniques in planning.

### Proposed Action and Alternatives

The Proposed Action consists of approving the CTC RPMP consistent with the military use of the CTC and the goals and objectives established in UFC 2-100-01. The CTC comprises three installations: SRMR, Camp Niantic, and EHRR.

The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CTC over the near-term (within 5 years) and long-term (20 years) planning horizons.

The CTC RPMP includes the following elements:

- a. Vision Plan, which includes a statement of the planning vision, planning goals, and planning objectives as well as an overall constraints and opportunities map or maps, a developable area map, a framework plan for the entire installation, a land pattern matrix if applicable, and a summary future development plan.
- b. Installation Development Plan, which includes Area Development Plans (including detailed constraints and opportunities maps, Regulating Plans, Illustrative Plans, Implementation Plans, capacity analysis, and supporting sketches and renderings), as well as appropriate Network Plans.

- c. Installation Planning Standards, which are installation standards for development.
- d. Development Program, which provides an overall installation strategy for using and investing in real property and includes a list of current known projects needed to support installation missions.
- e. Plan Summary, which provides an executive summary of each of the planning elements.

The EA includes a broad discussion of the types of activities proposed in the RPMP that might affect the human and natural environments because specific project effects are unknown at this time. Once project details are known, however, the CTARNG would conduct site-specific NEPA analysis that evaluates specific project effects in detail.

The CTARNG developed the following screening criteria to evaluate potential alternatives related to the project purpose and need:

- Fulfills UFC 2-100-01 master planning strategies and requirements
- Provides appropriate facilities to meet CTARNG's mission
- Provides mechanisms for short- and long-term planning and project programming

Two alternatives were developed and analyzed against the screening criteria:

- Approval of UFC 2-100-01-compliant RPMP (the Proposed Action).
- Not approving the UFC 2-100-01-compliant RPMP (the No Action Alternative). This alternative would include managing the CTC under the current planning processes, without a UFC-compliant RPMP.

Inclusion of a No Action Alternative is prescribed by the CEQ Regulations and serves as a benchmark against which proposed Federal actions are evaluated. No other project alternatives were identified that would meet the DoD's planning requirements and guidance.

### **Affected Environment**

The CTC is located in southern Connecticut. SRMR and Camp Niantic are in New London County, and EHRR is in New Haven County. SRMR is located on State-owned land within the towns of East Lyme, Old Lyme, and Lyme. It occupies about 2,000 acres and is comprised of a cantonment area and a training area. Camp Niantic is located on an 86-acre peninsula of State-owned land on the west bank of the Niantic River in East Lyme, directly west of the Town of Waterford. It is a state-of-the-art training center that provides training in technical and leadership areas as well as in physical conditioning, endurance, and agility. EHRR is located on 138 acres of State-owned land in East Haven. Its facilities include rifle and pistol ranges, a bayonet assault course, and support buildings.

The CTC is surrounded by low-density residential and undeveloped land, most of which is forested. In some areas, residences are located directly adjacent to the CTC's boundary. The Niantic River forms Camp Niantic's eastern border and part of its northern border.

The environment affected for each resource area evaluated in the EA is described in **Section 3.0** of this EA.

## Environmental Consequences

The CTARNG evaluated the Proposed Action to determine its potential for causing direct, indirect, and cumulative impacts on the environmental, cultural, and socioeconomic resources of the CTC and surrounding area. **Table ES-1** lists the resource areas evaluated in **Section 3.0** as well as the impacts on them that would result from the Proposed Action and the No Action Alternative, as evaluated in **Section 4.0**. The impacts analysis includes a broad discussion of environmental effects based on the types of activities proposed in the RPMP but does not discuss specific project effects in detail. The CTARNG would conduct future site-specific NEPA analysis once project details are known.

Table ES-1. Impact Comparison Matrix		
Technical Resource Area	No Action Alternative	Proposed Action
Location Description (Sections 3.1 and 4.1)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts due to the lack of a comprehensive plan to direct growth that would preserve or enhance the landscape and aesthetic appearance of the CTC.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts due to enhancements to the landscape and aesthetic appearance of the CTC.
Land Use (Sections 3.2 and 4.2)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts resulting from a lack of comprehensive planning for effective and efficient land use to meet mission requirements.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts resulting from comprehensive planning for effective and efficient land use to meet mission requirements.
Air Quality (Sections 3.3 and 4.3)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by emissions from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts from potential future activities caused by emissions from construction, demolition, and military training.
Noise (Sections 3.4 and 4.4)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from potential future activities such as construction, demolition, and military training.
Geology, Topography, and Soils (Sections 3.5 and 4.5)	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with individual construction and demolition projects. No impacts on geology or topography. No long-term impacts.	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with potential future activities such as construction, demolition, and military training. No impacts on geology or topography. No long-term impacts.
Water Resources (Sections 3.6 and 4.6)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance and an increase in impervious surfaces from new construction.	Short-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance. Long-term <i>less-than-significant</i> adverse impacts resulting from potential effects on wetlands, floodplains, and the coastal zone.

Table ES-1. Impact Comparison Matrix

Technical Resource Area	No Action Alternative	Proposed Action
Biological Resources (Sections 3.7 and 4.7)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with construction and ongoing military operations.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with future activities such as construction, demolition, and military training.
Cultural Resources (Sections 3.8 and 4.8)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. Undertakings would continue to be evaluated through project-specific NEPA analysis and executed in compliance with the Integrated Cultural Resources Management Plan (ICRMP).	Long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. For future site-specific projects, the CTARNG would conduct National Historic Preservation Act (NHPA) Section 106 consultation and compliance, follow Standard Operating Procedures (SOPs) in the ICRMP, and implement any project-specific mitigation measures identified through consultation. No short-term impacts.
Socioeconomics (Sections 3.9 and 4.9)	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children.	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children. Short- and long-term <i>less-than-significant</i> beneficial effects on the local economy resulting from construction activities and increased operational staffing over time.
Environmental Justice (Sections 3.10 and 4.10)	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.
Infrastructure (Sections 3.11 and 4.11)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand. Long-term beneficial impacts resulting from infrastructure improvements.
Hazardous and Toxic Materials and Waste (Sections 3.12 and 4.12)	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during activities such as construction, renovation, demolition, and ongoing mission operations.	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during potential future activities such as construction, renovation, demolition, and ongoing mission operations.

### Public and Agency Involvement

The CTARNG invited Federal agencies, Federally recognized Native American Tribes (Tribes), and State and local agencies to contribute to this EA through the Interagency/Intergovernmental Coordination of Environmental Planning (IICEP) process, which assisted the Guard in determining the appropriate scope for the EA. Interested parties were invited to comment on this Final EA and Draft Finding of No Significant Impact (FNSI) during a 45-day public comment period. Persons interested in receiving copies of the EA or FNSI could contact Robert Dollak, 360 Broad Street, Hartford, CT 06105; robert.f.dollak.nfg@mail.mil. The CTARNG published a Notice of Availability (NOA) in the *New London Day* and *Hartford Current* to announce the availability of this Final EA and Draft FNSI. Following the public comment period, the CTARNG addressed comments submitted by incorporating them into the EA and FNSI prior to signature by the CTARNG.

### Mitigation Measures and Best Management Practices (BMPs)

No mitigation measures would be necessary to reduce impacts to below significant levels. The CTARNG would, however, implement any mitigation measures identified through future project-specific NEPA analysis. For example, CTARNG would conduct Coastal Consistency Determinations and consult with the State Historic Preservation Officer (SHPO) and US Fish and Wildlife Service (USFWS) as necessary during future project-specific NEPA analysis and would implement any mitigation measures required by those agencies or permits issued by them or other regulatory agencies. In addition, at an appropriate time, the CTARNG would coordinate with the Connecticut Department of Transportation and the Town of East Lyme to conduct any needed studies to design the access control points to mitigate any potential adverse impacts on traffic on US Highway 1.

BMPs specified in **Section 4.13** of this EA would be implemented as applicable.

### Conclusion

The analysis in the EA supports the conclusion that there would be *no significant adverse* impacts, either individually or cumulatively, on the human or natural environment as a result of implementing the Proposed Action, provided that the Proposed Action is implemented in compliance with all applicable laws, ordinances, and regulations and mitigation measures and BMPs identified in this EA. Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect the human or natural environment.

Issuance of a FNSI is appropriate, and an EIS need not be prepared before implementing the Proposed Action.

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A	Interagency and Intergovernmental Coordination of Environmental Planning
B	Native American Consultation
C	U.S. Fish and Wildlife Information for Planning and Consultation Resource Lists

## **Acronyms and Abbreviations**

ARNG	Army National Guard
ARNG-I&E	ARNG-Installations & Environment Directorate
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
CAA	Clean Air Act
CCMA	Connecticut Coastal Management Act
CEPA	Connecticut Environmental Policy Act
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CTARNG	Connecticut Army National Guard
CTC	Connecticut Training Center
CTDEEP	Connecticut Department of Energy and Environmental Protection
dBA	A-Weighted Decibel
DNL	Day-Night Sound Level
DoD	US Department of Defense
DoDI	US Department of Defense Instruction
EA	Environmental Assessment
EHRR	East Haven Rifle Range
EIS	Environmental Impact Statement
EO	Executive Order
EPA	US Environmental Protection Agency
ESA	Endangered Species Act
FNSI	Finding of No Significant Impact
GHG	Greenhouse gas
HAP	Hazardous Air Pollutant
ICRMP	Integrated Cultural Resources Management Plan
IICEP	Interagency/Intergovernmental Coordination of Environmental Planning
JLUS	Joint Land Use Study
JROTC	Junior Reserve Officers' Training Corps
LED	Light-emitting diode

LID	Low Impact Development
MBTA	Migratory Bird Treaty Act
MILCON	Military Construction
MOU	Memorandum of Understanding
msl	Mean Sea Level
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NGB	National Guard Bureau
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NRHP	National Register of Historic Places
PCB	Polychlorinated biphenyl
PM <sub>2.5</sub>	Particulate Matter less than 2.5 Microns in Diameter
PM <sub>10</sub>	Particulate Matter less than 10 Microns in Diameter
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
ROI	Region of Influence
RPMP	Real Property Master Plan
SOP	Standard Operating Procedure
SR	State Route
SRMR	Stones Ranch Military Reservation
Tribes	Federally Recognized Native American Tribes
UFC	Unified Facilities Criteria
USC	United States Code
USFWS	US Fish and Wildlife Service
UTES	Unit Training Equipment Site



## **1.0 Purpose of and Need for the Proposed Action**

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### **1.1 Introduction**

The CTARNG prepared an RPMP for the CTC consistent with the requirements of DoD UFC 2-100-01, *Installation Master Planning*, which provides guidance for developing RPMPs for DoD installations (DoD 2012). The CTC comprises three installations—SRMR, Camp Niantic, and EHRR—all of which are in southern Connecticut (**Figure 1**).

In accordance with Federal law and Army Regulations, the CTARNG prepared this EA to evaluate the potential environmental impacts of approving the UFC 2-100-01-compliant RPMP. This document describes the purpose and need for the Proposed Action and presents the preferred action and alternative actions under consideration. This EA has been prepared in accordance with NEPA; implementing regulations issued by the CEQ in 40 CFR §§ 1500-1508; 32 CFR Part 651; and the 2011 ARNG NEPA Handbook (ARNG 2011).

### **1.2 Purpose and Need**

#### **1.2.1 Purpose of the Project**

In accordance with the 2013 OSD memorandum on installation master planning (OSD 2013), ARNG issued a memorandum to ARNG Construction and Facility Management Officers in December 2015 on preparing UFC 2-100-01-compliant RPMPs for 48 specified training installations by 1 October 2018 (ARNG 2015). The CTARNG prepared the CTC RPMP to incorporate the vision of the CTARNG Adjutant General and the facility requirements of all units and organizations assigned to or supported by the CTC. The purpose of the Proposed Action is to consider the long-term mission requirements and major development and training projects proposed for execution over the next 20 years that would further meet the requirements of and support for CTARNG missions. The CTARNG will accomplish this by approving the RPMP.

#### **1.2.2 Need for the Project**

The CTC RPMP is needed to comply with DoD Master Planning policy as well as to guide the CTARNG through the development of the CTC in a clear, sustainable manner that supports the CTC's current missions, preserves long-term military capabilities, supports the DoD's mission, and enriches the community it serves. Additionally, the format and standards prescribed by UFC 2-100-01 ensure that the CTARNG's installation planning is consistent with other DoD components and uses the latest techniques in planning.

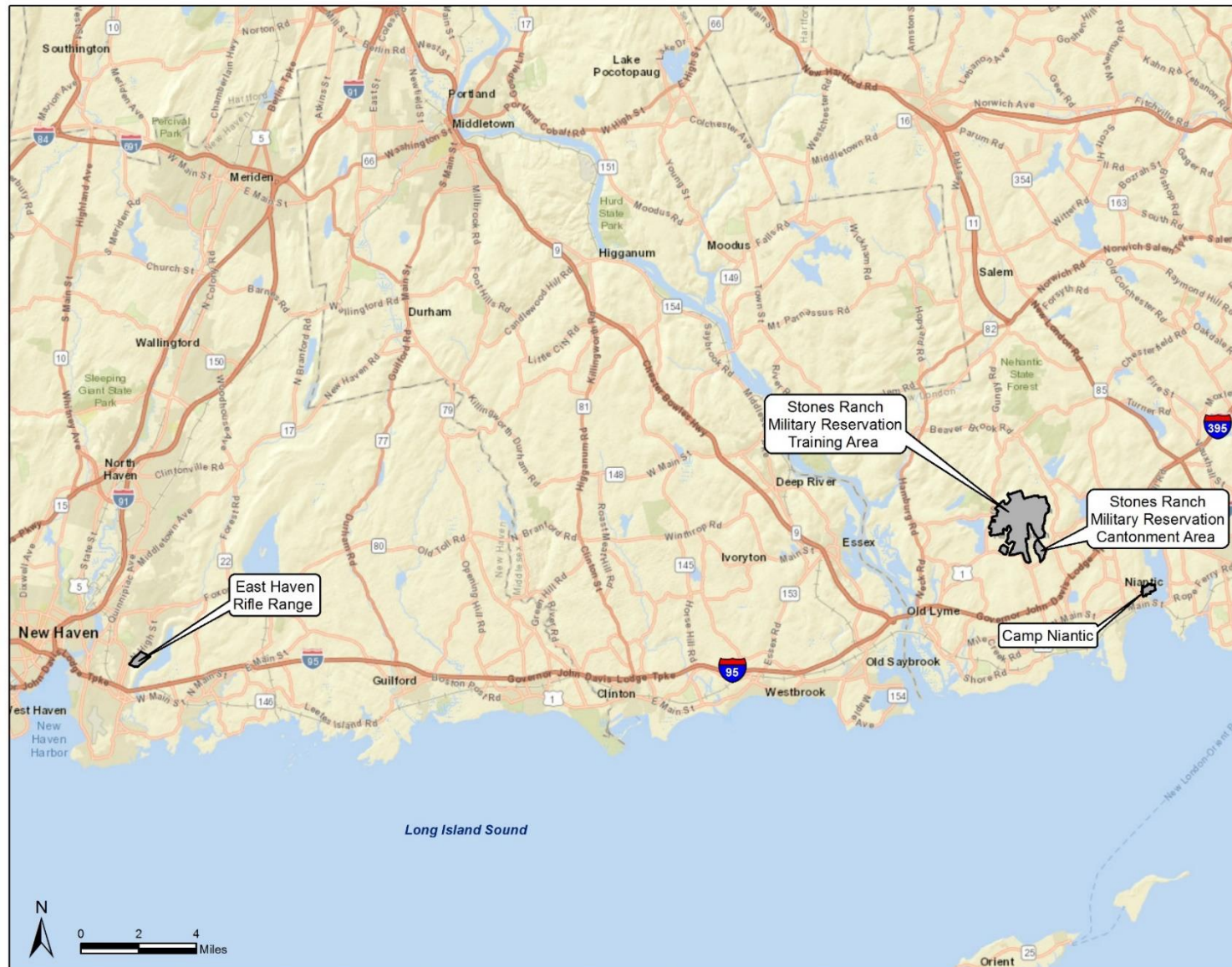


Figure 1. CTC Location

### 1.3 Scope of the EA

This EA identifies, documents, and evaluates the potential environmental, cultural, and socioeconomic effects of the analyzed alternatives in accordance with NEPA, CEQ Regulations, 32 CFR Part 651, and the ARNG NEPA Handbook (ARNG 2015). It includes a thorough evaluation of direct, indirect, and cumulative impacts, both temporary and permanent, that could occur from the Proposed Action and No Action Alternative and informs decision-makers and the public of the potential environmental consequences of the Proposed Action and alternatives along with associated mitigation.

Under NEPA, the analysis of environmental conditions addresses only those areas, or ROI, and environmental resources with the potential to be affected by the Proposed Action or No Action Alternative. Locations and resources with no potential to be affected are not analyzed. The ROI may vary by resource. The Army's NEPA regulation (32 CFR Part 651) calls for the environmental analysis to be proportionate to the nature and scope of the action, the complexity and level of anticipated effects on important resources, and the capacity of Army decisions to influence those effects in a productive, meaningful way from the standpoint of environmental quality.

This EA is intended to be an assessment of the approval of the RPMP, the Proposed Action alternative. The CTARNG will conduct appropriate NEPA analysis in coordination with the ARNG-Installations & Environment Directorate (ARNG-I&E) NEPA Team for future CTC projects identified in the RPMP at the appropriate time.

The scope of this EA includes an assessment of potential environmental impacts that would be expected with implementing the following alternatives:

1. Approval of the UFC 2-100-01-compliant RPMP (Proposed Action)
2. No Action Alternative. This alternative would include managing the installation under the its current planning document, which went into effect in 2001. Projects would be constructed, maintained, and/or repaired under that previously approved plan, but the installation's planning process would not be compliant with current DoD Master Planning policy and guidance.

### 1.4 Decision-Making

Pursuant to DoD Directive 5105.77, *National Guard Bureau (NGB)*, dated 30 October 2015, the NGB serves as the principal advisor to the US Army on matters involving the ARNG and is responsible for implementing DoD guidance on the structure and strength authorizations of the ARNG. The NGB is responsible for ensuring that ARNG activities are performed in accordance with applicable policies and regulations. As such, the NGB is the lead Federal agency responsible for preparing NEPA-compliant documentation on projects for which the CTARNG is the proponent. In that capacity, the NGB is ultimately responsible for environmental analyses and documentation; however, the CTARNG is the local responsible agency for NEPA document preparation.

This EA analyzes the potential for significant environmental effects associated with the Proposed Action and the No Action Alternative. If the analyses presented in this EA indicates that the Proposed Action would not result in significant environmental or socioeconomic effects, then a FNSI will be prepared. A FNSI briefly presents the reasons why a Proposed Action would not have a significant effect on the human environment and why an EIS would not be necessary. If

the analyses presented in this EA indicates that significant environmental effects would result from the Proposed Action that cannot be mitigated to insignificance, a Notice of Intent to prepare an EIS would be required or no action would be taken.

## 1.5 Public and Agency Involvement

The CTARNG invited Federal agencies, Federally recognized Tribes, and State and local agencies to contribute to this EA through the IICEP process, which assisted the CTARNG in determining the appropriate scope for this EA. **Section 8.0** contains a list of parties consulted, and **Appendix A** contains a copy of the letter sent to the parties listed in **Section 8.0**. **Appendix A** provides copies of agency correspondence, including all responses to the scoping letter. The agencies that responded to the scoping letter were the Connecticut Department of Energy and Environmental Protection (CTDEEP), US Army Corps of Engineers, and US Environmental Protection Agency (EPA). **Appendix B** provides copies of correspondence with Federally recognized Tribes. Consideration of the views and information from all interested persons promotes open communication and enables better decision-making by the CTARNG and NGB. All persons and organizations having potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Federally recognized Tribes, are urged to participate in the NEPA environmental analysis process.

Interested parties were invited to comment on this Final EA and Draft FNSI during a 45-day public comment period. Persons interested in receiving copies of the EA or FNSI could contact Robert Dollak, 360 Broad Street, Hartford, CT 06105; robert.f.dollak.nfg@mail.mil. The CTARNG will publish an NOA in the *New London Day* and *Hartford Current* to announce the availability of this Final EA and Draft FNSI. CTDEEP was the only party that provided comments during the public review of the EA. Following the public comment period, the CTARNG addressed CTDEEP's comments by incorporating them into the EA and FNSI prior to signature by the CTARNG.

## 1.6 Related NEPA, Environmental, and Other Documents

The following CTC planning and environmental documents are related to the Proposed Action and were reviewed during preparation of this EA:

- *Connecticut Training Center Installation Master Plan*, 90 percent submittal (Mead & Hunt and Tetra Tech 2018)
- *Stones Ranch Military Reservation & Camp Niantic Joint Land Use Study Background Report* (MDG 2016)
- *Integrated Natural Resources Management Plan Update (2006-2011) for Stone's Ranch Military Reservation, Camp Rell, Camp Hartell, and East Haven Rifle Range* (EA EST 2006)
- *Integrated Cultural Resources Management Update for Sites and Training Installations of the Connecticut Army National Guard, Fiscal Years 2016–2021* (E2M 2016)
- *Connecticut Army National Guard Faunal Survey Report for Stone's Ranch Military Reservation, East Haven Rifle Range, Camp Hartell, Camp Rell* (Gomez 2006)
- *Connecticut Army National Guard Floral Survey Report for Stones Ranch Military Reservation, East Haven Rifle Range, Camp Hartell, Camp Rell* (Hastings 2008)

## 1.7 Regulatory Framework

The Proposed Action and alternatives are subject to the following Federal and State environmental regulations:

- NEPA, as amended (42 USC §§ 4321-4347)
- CEQ Regulations for Implementing the Procedural Provisions of NEPA (40 CFR §§ 1500-1508)
- Clean Air Act, as amended (CAA) (42 USC § 7401 *et seq.*) and CAA Amendments of 1990
- National Pollutant Discharge Elimination System (40 CFR Part 122)
- Safe Drinking Water Act (42 USC § 300f *et seq.*)
- Executive Order (EO) 11990, *Protection of Wetlands*
- EO 11988, *Floodplain Management*
- Endangered Species Act of 1973 (ESA) (16 USC § 1531 *et seq.*)
- Migratory Bird Treaty Act (MBTA), as amended (16 USC §§ 703-712)
- NHPA, Section 106 (54 USC § 300101 *et seq.*)
- EO 13834, *Efficient Federal Operations*
- EO 13175, *Consultation and Coordination with Indian Tribal Governments*
- EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*
- EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*
- Resource Conservation and Recovery Act of 1976 (RCRA) (42 USC § 6901 *et seq.*)
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 USC § 9601 *et seq.*)
- CEPA (Connecticut General Statutes [CGS], Chapter 439)
- Connecticut ESA (CGS, Chapter 495)
- Connecticut Coastal Management Act (CCMA) (CGS, Chapter 444)
- Connecticut Public Act 18-82: An Act Concerning Climate Change Planning and Resiliency

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## 2.0 Description of the Proposed Action and Alternatives

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### 2.1 Introduction

The purpose of the Proposed Action is to consider the long-term mission requirements and major development and training projects proposed for execution over the next 20 years that would further meet the requirements of and support for CTARNG missions. The CTARNG will accomplish this by approving the RPMP. The RPMP establishes long-term strategies to guide the physical development of the CTC over the next 20 years. This section describes the Proposed Action, the alternatives analysis process, and the screening criteria used to evaluate the alternatives. The programmed fiscal year for execution of this project is 2019, and the project funding source is Military Construction (MILCON).

### 2.2 Proposed Action

The Proposed Action consists of approval of the CTC RPMP consistent with the military use of the CTC and the goals and objectives established in UFC 2-100-01. The CTC comprises three installations: SRMR, Camp Niantic, and EHRR.

#### 2.2.1 Description of CTC

The SRMR is located on State-owned land within the towns of East Lyme, Old Lyme, and Lyme. It occupies about 2,000 acres and is comprised of a cantonment area (**Figure 2**) and a training area (**Figure 3**). The cantonment area is the primary administrative area for the reservation. The training area is a multiuse tactical training area for the CTARNG, consisting of a variety of tactical training areas and ranges, bivouac areas, a land-navigation course, confidence course, leadership reaction course, rappelling tower, demolition range, bridge training facility, diesel fuel point with washrack, ammunition storage facility, and an airstrip and landing points used by rotary wing aircraft (i.e., helicopters).

Camp Niantic (**Figure 4**) is located on an 86-acre peninsula of State-owned land on the west bank of the Niantic River in East Lyme, directly west of the Town of Waterford. It is a state-of-the-art training center that provides training in technical and leadership areas as well as in physical conditioning, endurance, and agility. Training is provided in conventional classrooms, special simulators, and on-facility grounds. Camp Niantic is also used by other military services, Federal and State government departments, and civilian tenants.

The EHRR (**Figure 5**) is located on 138 acres of State-owned land in East Haven. Its facilities include rifle and pistol ranges, a bayonet assault course, and support buildings.



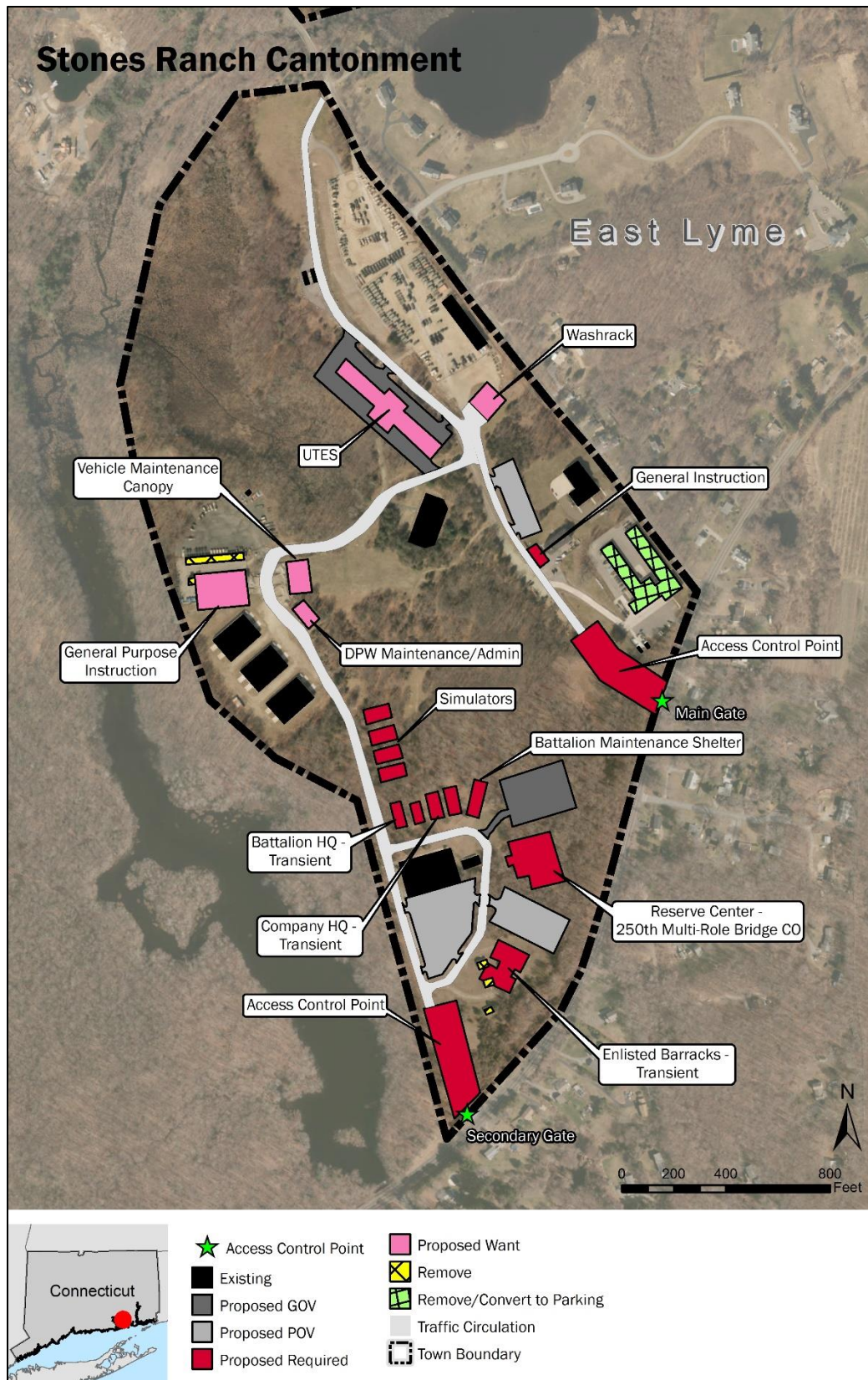


Figure 2. SRMR Cantonment Area



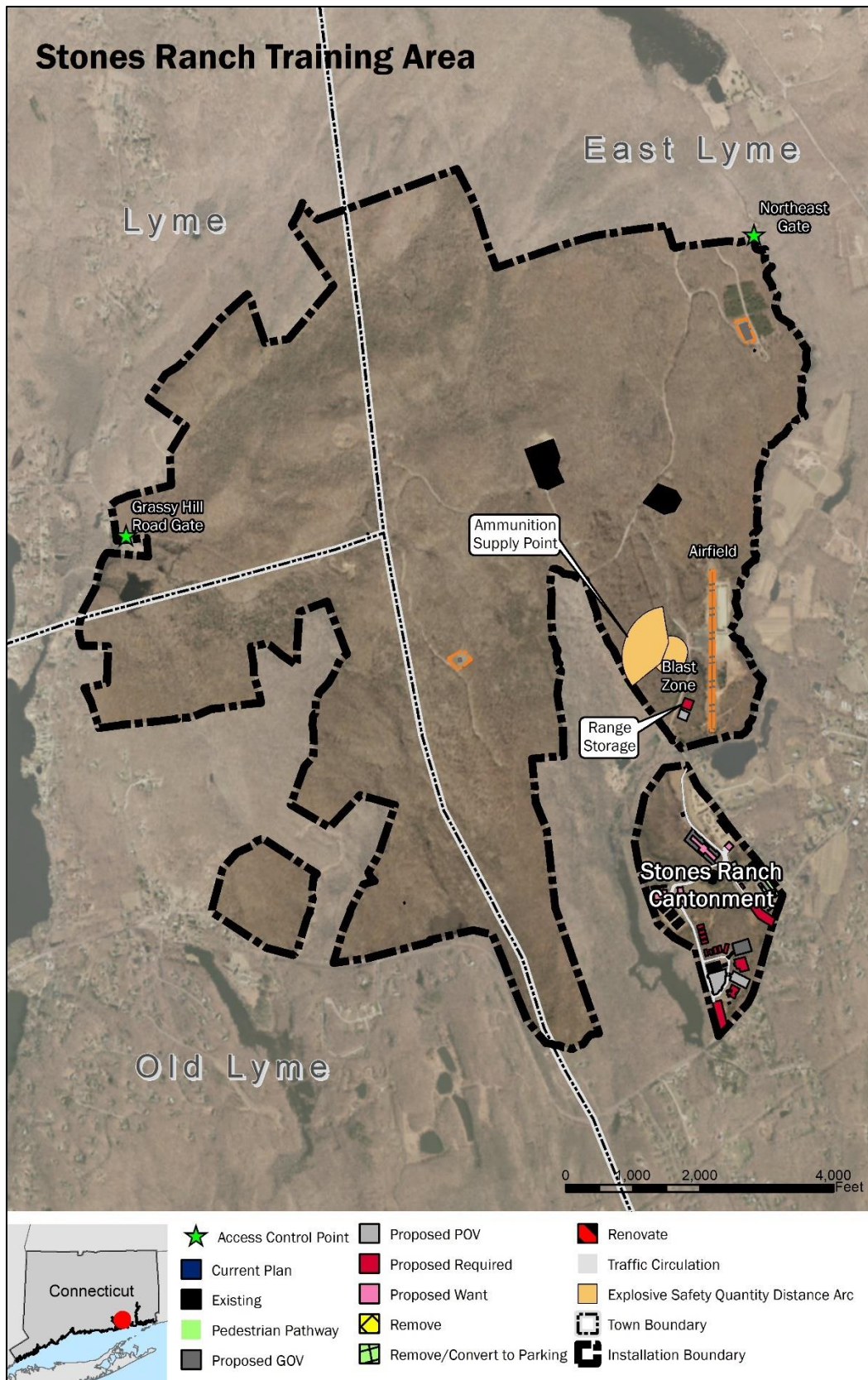


Figure 3. SRMR Training Area



Figure 4. Camp Niantic



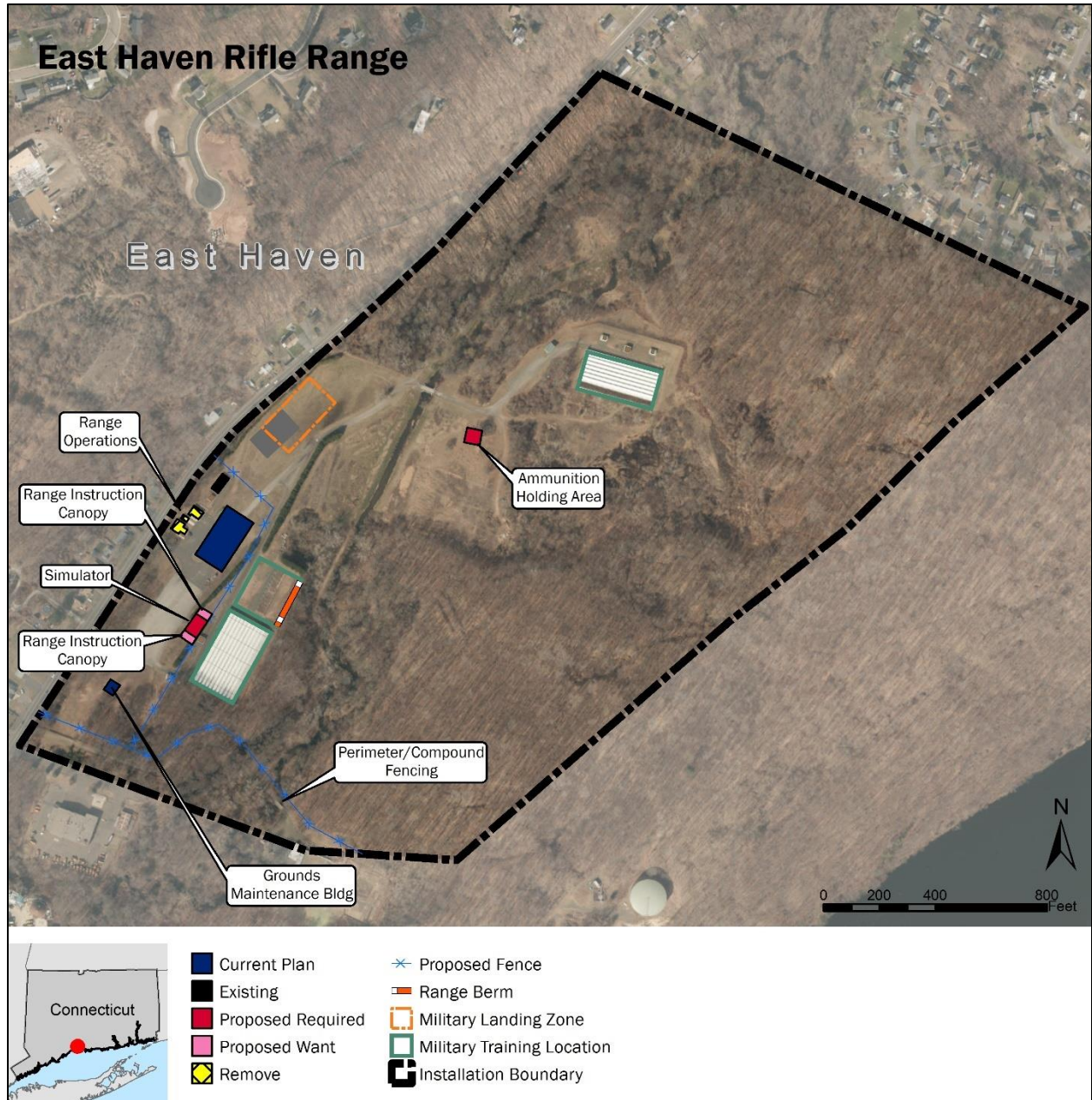


Figure 5. EHRR

## 2.2.2 CTC RPMP

The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CTC over the near-term (within 5 years) and long-term (20 years) planning horizons.

At a minimum, the CTC RPMP includes the following elements:

- a. Vision Plan, which includes a statement of the planning vision, planning goals, and planning objectives as well as an overall constraints and opportunities map or maps, a developable area map, a framework plan for the entire installation, a land pattern matrix if applicable, and a summary future development plan.
- b. Installation Development Plan, which includes Area Development Plans (including detailed constraints and opportunities maps, Regulating Plans, Illustrative Plans, Implementation Plans, capacity analysis, and supporting sketches and renderings), as well as appropriate Network Plans.
- c. Installation Planning Standards, which are installation standards for development.
- d. Development Program, which provides an overall installation strategy for using and investing in real property and includes a list of current known projects needed to support installation missions.
- e. Plan Summary, which provides an executive summary of each of the planning elements.

## 2.2.3 RPMP Planning Goals and Types of Projects

**Table 1** lists some of the RPMP planning goals and supporting types of potential future construction that might affect the human and natural environments. This EA includes a broad discussion of potential environmental effects based on the types of potential future activities proposed in the RPMP but does not discuss specific project effects in detail. Once the details of potential future construction and other activities identified in the RPMP are known, the CTARNG will conduct site-specific NEPA analyses in coordination with the ARNG-I&E NEPA Team at the appropriate time.

Table 1. Planning Goals and Supporting Project Types		
Planning Goal	Types of Projects	Potential Effects on the Environment
Modernize or replace substandard facilities and utilities	<ul style="list-style-type: none"> <li>• Renovate barracks, dining facilities, physical fitness centers, classrooms, and training space</li> <li>• Construct building for exam space and Soldier readiness processing facilities</li> <li>• Construct or renovate maintenance and administrative buildings</li> <li>• Construct or expand parking</li> <li>• Upgrade and extend utility infrastructure (communications, electrical, stormwater, wastewater, and water)</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Temporary noise and air emissions</li> <li>• New structures in viewshed</li> <li>• Use of hazardous materials (e.g., petroleum, oil, and lubricants)</li> <li>• Disposal of hazardous materials and waste (e.g., asbestos-containing materials, lead-based paint, and waste oil)</li> <li>• Addition of impervious surface</li> </ul>

<b>Table 1. Planning Goals and Supporting Project Types</b>		
<b>Planning Goal</b>	<b>Types of Projects</b>	<b>Potential Effects on the Environment</b>
Build facilities to meet CTC requirements and increase training relevance	<ul style="list-style-type: none"> <li>• Construct Medical Detachment Readiness Center</li> <li>• Construct Company Readiness Center and associated transient support facilities</li> <li>• Construct general instruction facilities</li> <li>• Construct training simulators</li> <li>• Construct modern range operations facilities</li> <li>• Construct loading ramps, canopies, washracks, and ammunition holding area</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Temporary noise and air emissions</li> <li>• New buildings in viewshed</li> <li>• Use of hazardous materials (e.g., petroleum, oil, and lubricants)</li> <li>• Addition of impervious surface</li> </ul>
Improve multimodal travel throughout CTC	<ul style="list-style-type: none"> <li>• Implement new traffic circulation plan</li> <li>• Realign roadways</li> <li>• Pave roadways</li> <li>• Locate new buildings to allow access by all transportation modes</li> <li>• Improve or construct pedestrian pathways</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Temporary noise and air emissions</li> <li>• Addition of impervious surface</li> <li>• Change in traffic patterns</li> <li>• Safer walkable pedestrian routes</li> <li>• Reduce greenhouse gas (GHG) emissions</li> </ul>
Improve antiterrorism/force protection (AT/FP) and security	<ul style="list-style-type: none"> <li>• Construct Access Control Point</li> <li>• Relocate UTES</li> <li>• Install perimeter/compound fencing</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Temporary noise and air emissions</li> <li>• Use of hazardous materials (e.g., petroleum, oil, and lubricants)</li> <li>• Addition of impervious surface</li> <li>• Change in traffic pattern</li> </ul>
Maintain and foster relationships with local partners	<ul style="list-style-type: none"> <li>• Connect installation wastewater to local utility wastewater infrastructure</li> <li>• Limit height of development in coastal area to comply with local zoning</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Maintain viewshed character</li> </ul>
Increase CTC resiliency	<ul style="list-style-type: none"> <li>• Improve utility connections and efficiency of service with local utility providers</li> <li>• Implement green infrastructure plan</li> <li>• Use low impact development design concepts</li> <li>• Use UFC-compliant site planning</li> </ul>	<ul style="list-style-type: none"> <li>• Conserve energy</li> <li>• Maintain and enhance viewshed character</li> <li>• Use of sustainable landscaping</li> <li>• Reduce impervious surfaces and improve stormwater drainage</li> <li>• Plan for open space</li> </ul>

## 2.3 Alternatives Considered

This section summarizes the alternatives development process and screening criteria, alternatives evaluated, and alternatives eliminated from further analysis and provides an alternatives impact comparison matrix. NEPA, its implementing regulations, and the Army's policies for implementing NEPA (32 CFR Part 651) require that all reasonable alternatives be rigorously explored and objectively evaluated. In addition, alternatives that are eliminated from detailed analysis must be identified and reasons provided for eliminating them.

For purposes of analysis, an alternative was considered "reasonable" only if it would meet the requirements of the regulations mentioned above. Reasonable alternatives included those that were (1) practical or feasible from a technical and economic standpoint; and (2) supportive of the purpose of and need for the Proposed Action.

"Unreasonable" alternatives would not support the purpose of and need for the Proposed Action. No project alternatives were identified that would meet the DoD's planning requirements and guidance. Therefore, the No Action Alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated.

### 2.3.1 Alternatives Development (Screening Criteria)

The CTARNG developed the following screening criteria to evaluate a potential alternative's reasonableness and feasibility related to the Proposed Action's purpose and need:

- Fulfills UFC 2-100-01 master planning strategies and requirements
- Provides appropriate facilities to meet the CTARNG's mission
- Provides mechanisms for short- and long-term planning and project programming

The CTARNG developed alternatives and evaluated them using these screening criteria to determine if they were reasonable and feasible. Alternatives that met the screening criteria were carried forward for further evaluation. Alternatives that did not meet the screening criteria were dismissed from further evaluation.

The following alternatives were developed and analyzed against the screening criteria:

- Approval of UFC 2-100-01-compliant RPMP (the Proposed Action).
- Not approving the UFC 2-100-01-compliant RPMP (the No Action Alternative). This alternative would include managing the CTC under the current planning processes, without a UFC-compliant RPMP.

**Table 2** provides an evaluation of these alternatives against the screening criteria.

Alternative	Fulfills UFC 2-100-01 Master Planning Strategies and Requirements	Provides Appropriate Facilities to Meet CTARNG's Mission	Provides Mechanism for Planning and Project Programming	Retained or Dismissed
Approval of the UFC 2-100-01 RPMP (Proposed Action)	Yes	Yes	Yes	Retained
Not Approving the UFC 2-100-01 RPMP (No Action)	No	No	No	Retained

## 2.3.2 Evaluated Alternatives

### 2.3.2.1 Approval of the UFC 2-100-01 RPMP (Proposed Action)

Under the Proposed Action, which is the CTARNG's Preferred Action Alternative, the CTC would approve the UFC 2-100-01 RPMP, which includes a comprehensive approach to developing the CTC using planning strategies that reinforce capabilities to support the ARNG's mission, promote quality of life, and enhance sustainability and environmental viability on the installation.

### 2.3.2.2 No Action Alternative

The No Action Alternative would rely on continued installation planning without an approved RPMP. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations (40 CFR Part 1502.14).

## 2.3.3 Alternatives Eliminated from Further Consideration

### 2.3.3.1 Approval of a Combination of ARNG RPMPs

This alternative would be approval of a combination of various plans, including Real Property Development Plans, Long-Range Construction Plans, and Range Complex Master Plans. Approval of this alternative does not meet DoD's, Army's, or NGB's current master planning policies.

## 2.3.4 Alternatives' Impacts Comparison Matrix

Table 3 compares the potential impacts under each evaluated alternative.

Table 3. Impact Comparison Matrix

Technical Resource Area	No Action Alternative	Proposed Action
Location Description (Sections 3.1 and 4.1)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts due to the lack of a comprehensive plan to direct growth that would preserve or enhance the landscape and aesthetic appearance of the CTC.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts due to enhancements to the landscape and aesthetic appearance of the CTC.
Land Use (Sections 3.2 and 4.2)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts resulting from a lack of comprehensive planning for effective and efficient land use to meet mission requirements.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts resulting from comprehensive planning for effective and efficient land use to meet mission requirements.
Air Quality (Sections 3.3 and 4.3)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by emissions from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts from potential future activities caused by emissions from construction, demolition, and military training.
Noise (Sections 3.4 and 4.4)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from potential future activities such as construction, demolition, and military training.
Geology, Topography, and Soils (Sections 3.5 and 4.5)	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with individual construction and demolition projects. No impacts on geology or topography. No long-term impacts.	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with potential future activities such as construction, demolition, and military training. No impacts on geology or topography. No long-term impacts.
Water Resources (Sections 3.6 and 4.6)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance and an increase in impervious surfaces from new construction.	Short-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance. Long-term <i>less-than-significant</i> adverse impacts resulting from potential effects on wetlands, floodplains, and the coastal zone.
Biological Resources (Sections 3.7 and 4.7)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with construction and ongoing military operations.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with future activities such as construction, demolition, and military training.



Table 3. Impact Comparison Matrix

Technical Resource Area	No Action Alternative	Proposed Action
Cultural Resources (Sections 3.8 and 4.8)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. Undertakings would continue to be evaluated through project-specific NEPA analysis and executed in compliance with the ICRMP.	Long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. For future site-specific projects, the CTARNG would conduct NHPA Section 106 consultation and compliance, follow SOPs in the ICRMP, and implement any project-specific mitigation measures identified through consultation. No short-term impacts.
Socioeconomics (Sections 3.9 and 4.9)	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children.	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children. Short- and long-term <i>less-than-significant</i> beneficial effects on the local economy resulting from construction activities and increased operational staffing over time.
Environmental Justice (Sections 3.10 and 4.10)	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.
Infrastructure (Sections 3.11 and 4.11)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand. Long-term beneficial impacts resulting from infrastructure improvements.
Hazardous and Toxic Materials and Waste (Sections 3.12 and 4.12)	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during activities such as construction, renovation, demolition, and ongoing mission operations.	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during potential future activities such as construction, renovation, demolition, and ongoing mission operations.

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## 3.0 Affected Environment

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This section describes the affected environment, or baseline conditions, for resources potentially affected by the Proposed Action or No Action Alternative. In compliance with NEPA, CEQ implementing regulations, and 32 CFR Part 651, the affected environment includes only those aspects of the environment potentially subject to the alternatives' effects.

### 3.1 Location Description

The CTC is located in southern Connecticut. SRMR and Camp Niantic are in New London County, and EHRR is in New Haven County.

#### 3.1.1 SRMR

The SRMR is located on State-owned land within the towns of East Lyme, Old Lyme, and Lyme. It occupies about 2,000 acres and is comprised of a cantonment area (**Figure 2**) and a training area (**Figure 3**). The cantonment area is the primary administrative area for the reservation. The training area is a multiuse tactical training area for the CTARNG, consisting of a variety of tactical training areas and ranges, bivouac areas, a land-navigation course, confidence course, leadership reaction course, rappelling tower, demolition range, bridge training facility, diesel fuel point with washrack, ammunition storage facility, and an airstrip and landing points used by rotary wing aircraft (i.e., helicopters).

#### 3.1.2 Camp Niantic

Camp Niantic (**Figure 4**) is located on an 86-acre peninsula of State-owned land on the west bank of the Niantic River in East Lyme, directly west of the Town of Waterford. It is a state-of-the-art training center that provides training in technical and leadership areas as well as in physical conditioning, endurance, and agility. Training takes place in conventional classrooms, special simulators, and on-facility grounds. Camp Niantic is also used by other military services, Federal and State government departments, and civilian tenants.

#### 3.1.3 EHRR

The EHRR (**Figure 5**) is located on 138 acres of State-owned land in East Haven. Its facilities include rifle and pistol ranges, a bayonet assault course, and support buildings.

The CTC is surrounded by low-density residential and undeveloped land, most of which is forested. In some areas, residences are located directly adjacent to the CTC's boundary. The Niantic River forms Camp Niantic's eastern border and part of its northern border.

### 3.2 Land Use

The RPMP characterizes land use by dividing the CTC installations into districts, which are defined as sections of installation that are distinguishable by their character, land use, or the activities occurring within them. The CTC district designations are maintenance, storage, training, and transient and are shown in **Figures 6 and 7** (Mead & Hunt and Tetra Tech 2018).

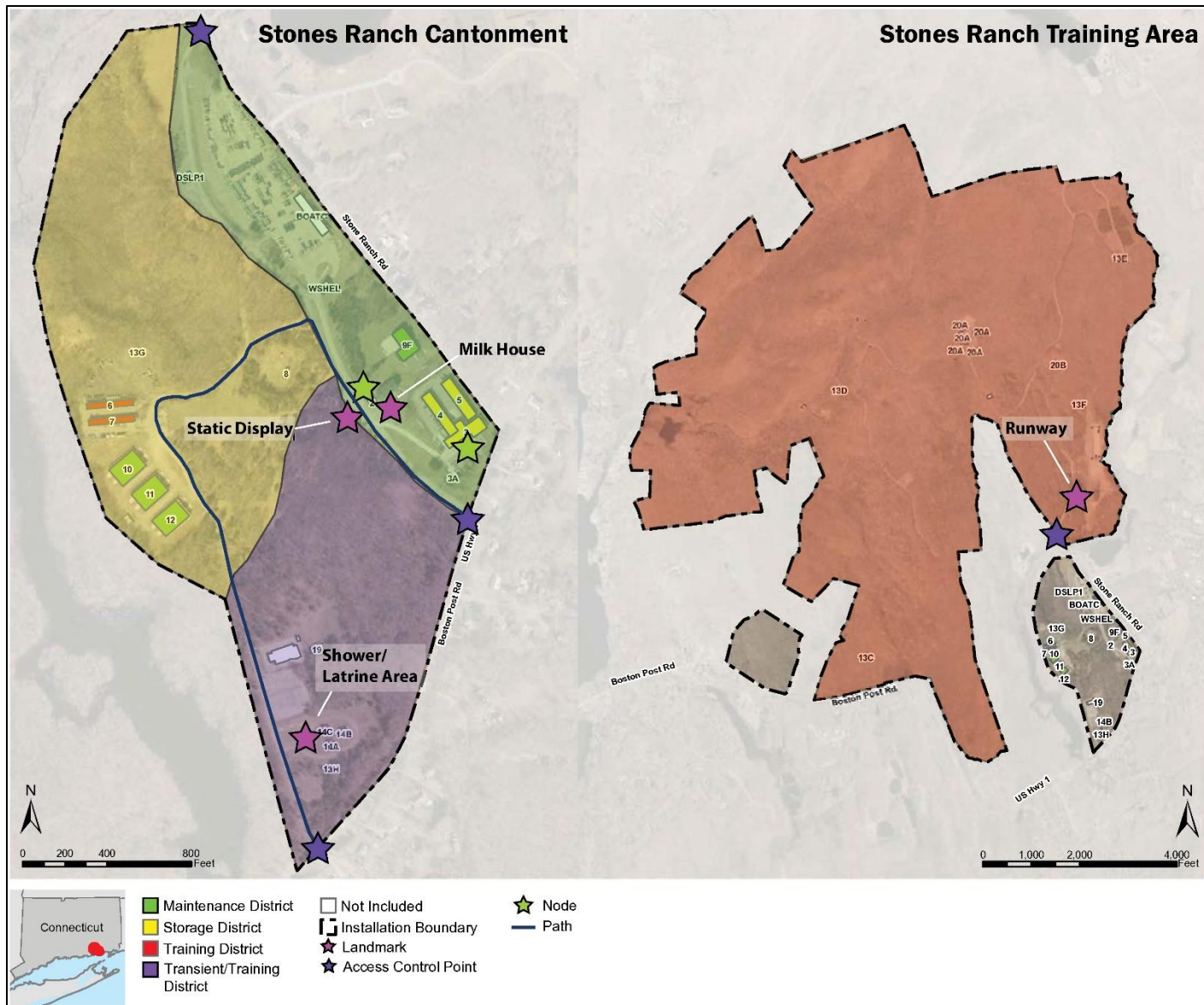


Figure 6. Land Use at SRMR

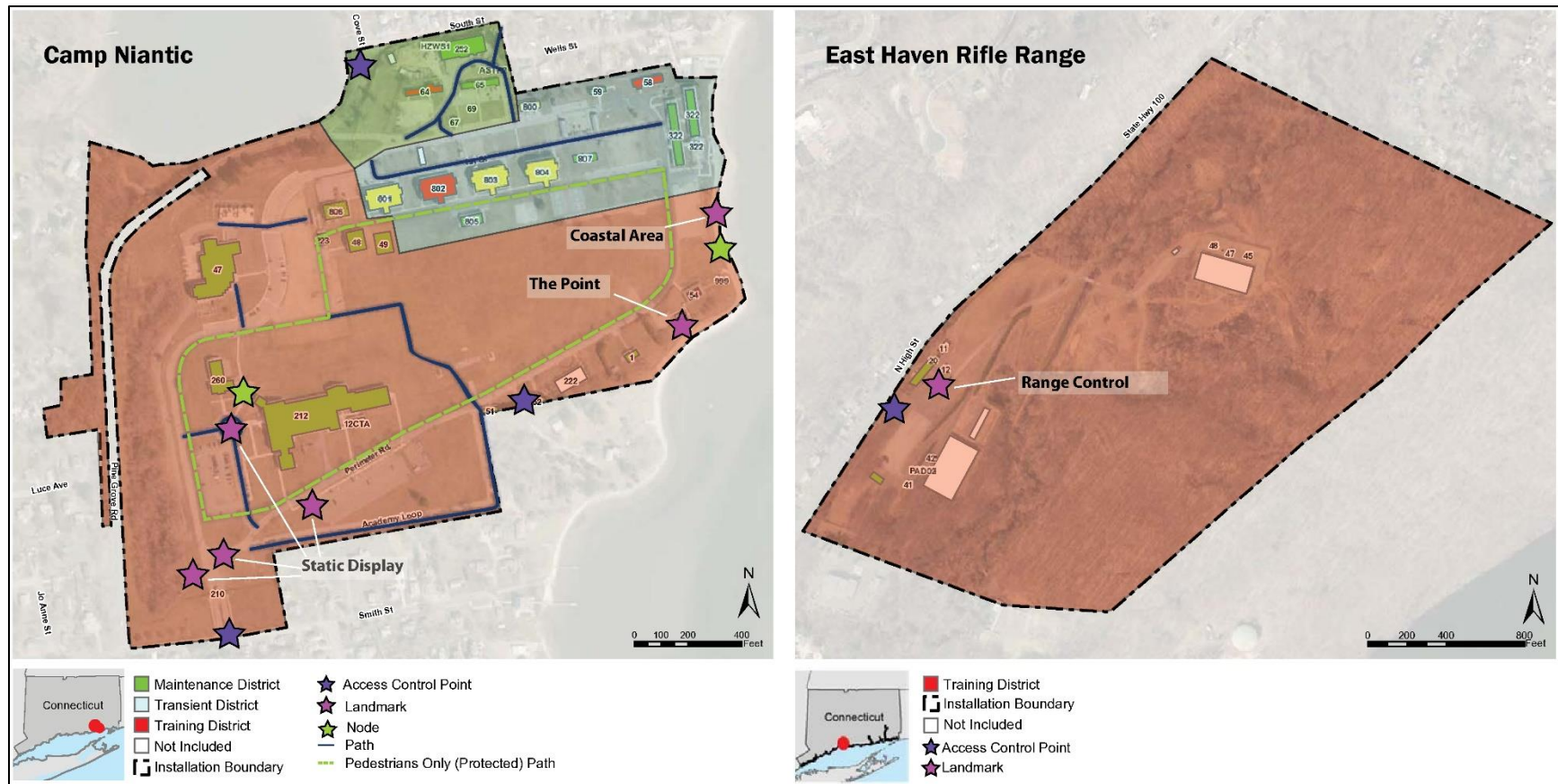


Figure 7. Land Use at Camp Niantic and EHRR

### 3.2.1 SRMR

The SRMR cantonment area (**Figure 6**) has three districts: maintenance, storage, and transient/training. The maintenance district contains the Directorate of Public Works functions, fire station, Range Control Building, vehicle maintenance, and warehousing. The storage district contains general storage, magazine, and warehousing. The mixed-use transient/training district contains a shower/latrine area, training course, covered training area, and open training land.

The SRMR training area (**Figure 6**) is exclusively a training district that supports a demolition range, Forward Operating Base, rappel tower, Urban Warfare Training, and areas for individual and collective training (Mead & Hunt and Tetra Tech 2018).

Land around the SRMR cantonment area is primarily zoned rural and residential. Along the eastern side of the SRMR are some rural, large-lot residential homes, but to the north and west are mostly forests, wetlands, and lakes. The State-owned forests of Beckett Hill State Park Reserve and Nehantic State Forest are to the northwest and northeast, and privately owned forest land comprising the Yale University School of Forestry and Environmental Studies Outdoor Education Center is to the north. To the south and southwest are single-family homes, undeveloped land, and Goodwins Pond (MDG 2016; Mead & Hunt and Tetra Tech 2018).

### 3.2.2 Camp Niantic

Camp Niantic is primarily a training district, but also has maintenance and transient districts (**Figure 7**). The training district is a developed area that houses the Regional Training Institute and other training support facilities such as classroom buildings, simulators, and readiness support center. The maintenance district contains the Directorate of Public Works functions and general administrative buildings. The transient district contains the barracks, chapel, dining facilities, medical clinic, and workout facilities (Mead & Hunt and Tetra Tech 2018).

Land around Camp Niantic is zoned residential to the north, south, and west and commercial marine to the northwest and east along the waterfront areas of the Niantic River and Smith Cove. Camp Niantic is surrounded by mostly residential development, with the exception of a narrow, wooded area to the west that separates it from a residential neighborhood. The commercial marine zoning limits the waterfront areas to low-intensity marine commercial uses (MDG 2016; Mead & Hunt and Tetra Tech 2018).

### 3.2.3 EHRR

The EHRR is a training district (**Figure 7**). It has multiple ranges for individual weapons training, with a few support facilities (range operations and support buildings, a covered mess, and shower/latrine) (Mead & Hunt and Tetra Tech 2018).

Land around the EHRR is primarily zoned residential with the exception of some light industrial zoning on the central western boundary (Mead & Hunt and Tetra Tech 2018). Single-family residential homes border the EHRR to the north and west. To the south is a private gun range and an East Haven Police Department facility. The eastern boundary is a wooded area that is part of the Lake Saltonstall Recreation Area owned by the Regional Water Authority.

### 3.2.4 Zoning

The CTC is exempt from municipal zoning per the CGS Chapter 124 (*Municipal Zoning*), which states that building, structures, or land “under control, administration, or jurisdiction of a state or federal agency” is exempted from local zoning authority (MDG 2016) and, therefore, has no zoning designation.

### 3.2.5 Land Use Compatibility

The juxtaposition of the CTC and surrounding residential areas has been the baseline for area land use for many years. To mitigate compatibility issues, help prevent future issues, and improve coordination between the military and local communities, the CTARNG recently collaborated with the towns of East Lyme, Lyme, and Old Lyme on a Joint Land Use Study (JLUS) addressing SRMR and Camp Niantic (MDG 2016). The JLUS identifies measures to enhance current and future compatibility with no net loss to the military mission. No JLUS has been developed for EHRR.

## 3.3 Air Quality

Region 1 of the EPA and the CTDEEP regulate air quality in Connecticut. The CAA requires the EPA to establish National Ambient Air Quality Standards (NAAQS) (40 CFR Part 50) that specify acceptable concentrations of air pollutants that are harmful to human health and the environment. The EPA has established NAAQS for six criteria pollutants: particulate matter (measured as both particulate matter less than 10 microns in diameter [ $PM_{10}$ ] and particulate matter less than 2.5 microns in diameter [ $PM_{2.5}$ ]), sulfur dioxide, carbon monoxide, oxides of nitrogen, ozone, and lead. Areas where pollutant concentrations exceed the NAAQS are designated as *nonattainment* areas, and areas with levels below the NAAQS are designated as *attainment* areas. Connecticut is designated as a moderate nonattainment area for ozone and as an attainment area for the remaining NAAQS (EPA 2018a; CTDEEP 2018).

The General Conformity Rule (40 CFR 51 Part 93) requires Federal actions to conform to a State Implementation Plan approved or promulgated under Section 110 of the CAA. An air conformity applicability analysis, and possibly a formal air conformity determination, are required for Federal actions in nonattainment areas unless the increase in emissions is below thresholds considered to be *de minimis*, meaning of minimal importance.

Sources of air emissions at the CTC include fuel dispensing, facility heating and cooling, vehicle and aircraft operation and maintenance, diesel generators, storage tanks, degreasing operations, welding, refrigeration, and smoke generation for military training purposes. The CTC does not produce emissions that exceed major source thresholds for any criteria pollutant or hazardous air pollutant (HAP). The CTC’s GHG emissions do not exceed emissions thresholds that would require reporting or installation of control devices (LBG 2012). **Table 4** presents the CTC’s most recent emissions estimates.



**Table 4. CTC Air Emissions Compared to *De Minimis* Thresholds**

Pollutant	SRMR (tpy)	Camp Niantic (tpy)	EHRR (tpy)	De Minimis Threshold (tpy)	Exceeds De Minimis Thresholds? (Yes/No)
PM <sub>2.5</sub>	<0.1	0.1	<0.1	100	No
PM <sub>10</sub>	<0.1	0.1	<0.1	100	No
Sulfur oxides	0.1	0.5	<0.1	100	No
Nitrogen oxides	0.2	2.0	<0.1	100	No
Volatile organic compounds	0.1	0.2	<0.1	100	No
Carbon monoxide	<0.1	0.4	<0.1	100	No
HAPs, including lead	<0.1	<0.1	NA	100	No

Source: LBG 2012.

Notes: NA = not applicable; tpy = tons per year.

GHGs are gases that trap heat in the atmosphere, thereby contributing to the greenhouse effect and climate change. Many GHGs occur naturally in the atmosphere, but human activities such as the burning of fossil fuels also release GHGs. The primary GHGs are carbon dioxide, methane, nitrous oxide, and fluorinated gases (EPA 2018b).

To address potential effects of climate change, EO 13834 directs the Federal government to enhance the resiliency of its infrastructure and operations. While EO 13834 does not require a formal planning process for evaluating and managing climate change, Federal agencies are nonetheless directly involved in addressing climate resilience and adapting to its implications across their services, programs, and assets (FedCenter 2018). For example, DoD identifies climate change as a national security concern and reduced its GHG emissions by approximately 12 percent between FY08 and FY15 (DOE 2016).

This EA evaluates GHG emissions as a category of air emissions and considers the potential climate change effects of the Proposed Action. It does not, however, attempt to measure the actual incremental impacts of GHG emissions generated by the Proposed Action as criteria to determine significance in accordance with NEPA are not yet agreed upon or established.

### 3.4 Noise

Sounds are generated by activities essential to daily life and the military mission such as military training, aircraft, construction, lawn maintenance, and vehicle operation. Noise is defined as unwanted sound. Whether or not sound is perceived as noise varies depending on factors that include the time of day, the source of the sound, the distance between the sound source and the receiver, and the sensitivity of the receiver.

Sound is measured in decibels (dB) on a logarithmic scale. Sound can also be expressed as A-weighted decibels (dBA), which approximates how the human ear responds to different frequencies of sound. A change in sound level of 3 dB or less is barely perceptible by the human ear, while a 10-dB increase or decrease in sound level is perceived as a doubling or halving of



sound level. In addition, sound attenuates (lessens) by approximately 6 dB with each doubling of distance from the noise source (FTA 2006).

The Noise Control Act of 1972 (Public Law 92-574) directs Federal agencies to comply with applicable Federal, State, and local noise control regulations. Chapter 14 of Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, implements Federal regulations associated with operational noise from Army activities. This regulation defines sound levels associated with aircraft, impulsive noises, and small arms and whether they are considered compatible or incompatible with various land uses.

Except for the Town of Lyme, the towns surrounding the CTC each have local noise ordinances. All of the ordinances include not-to-exceed ambient sound levels; however, construction activities and sometimes blasting are exempt during certain hours:

- Town of Old Lyme Code Chapter 95-3 exempts construction activities Monday through Saturday 7 a.m. to 1 hour after sundown and noise from blasting exempted 8 a.m.–5 p.m.
- Town of East Lyme Noise Ordinance exempts construction activities during daytime hours but limits nighttime levels to 45 dBA.
- East Haven Code of Ordinances Article IV Noise exempts noise from construction activities weekdays 7 a.m.–9 p.m. and weekends 8:30 a.m.–9 p.m. and blasting activities 8 a.m.–5 p.m.

The Occupational Safety and Health Administration (OSHA) regulates noise impacts on workers by setting limits to ensure that workers are not exposed to an 8-hour, time-weighted average of 90 dBA or more or noise levels higher than 115 dBA for any duration of time. Exposure to impulsive or impact noise (i.e., loud, short duration sounds) is not to exceed a peak of 140 dB.

The CTARNG used the techniques specified in American National Standards Institute's *Quantities and Procedures for Description and Measurement of Environmental Sound Part 3: Short-term measurements with an observer present* to estimate background noise levels at the CTC (ANSI 2003). Based on those techniques, the CTC falls into Category 3: quiet commercial, industrial, and normal urban and noise suburban residential and the background noise level is estimated to be 55 dBA day-night sound level (DNL). DNL is the average noise level over a 24-hour period with a 10-dB penalty added to noise that occurs between 10 p.m. and 7 a.m. to account for its increased annoyance.

Residences are located near all three CTC installations. Noise from military training activities, particularly at SRMR and EHRR, is sometimes audible at residences located near those installations. The residences nearest to the CTC are approximately 130 feet from the boundary of SRMR, 51 feet from Camp Niantic, and 215 feet from EHRR. No other noise-sensitive receptors surrounding the installations such as schools, daycare centers, churches, or hospitals are within the range of hearing from the CTC and no noise-sensitive receptors are located on the CTC.

EHRR has been used as a firing range since 1868 (CTARNG 2009). Operational noise contours were developed for EHRR in 2008. The zone defined as Noise Zone II, where peak noise levels for small caliber weapons are between 87 and 104 PK15(met) (defined as the maximum value of the instantaneous sound pressure for each unique sound source and applying the 15-percentile rule accounting for meteorological variation) extends off-post. The distance Noise Zone II extends off-post varies depending on which range is in use and the type of weapons training being conducted, but is typically between 100 and 400 meters, with a maximum of 1,200 meters.

Although residential development is typically not compatible with this zone, a few residences are within Noise Zone II; however, EHRR receives few if any noise complaints (USACHPPM 2008).

### 3.5 Geology, Topography, and Soils

#### 3.5.1 Geology

The geology of the State was formed by a combination of plate tectonics that gave it its characteristic north-south series of ridges and valleys and glaciation that scoured and compressed the landscape. Four land forms shape the Connecticut of today. The low coastal strip extending along the coast of Long Island Sound from New York to Rhode Island is a rocky surface broken by three large rivers that have carved out north-south valleys. The Central Valley is low—about 100 feet above sea level on the Connecticut River near Massachusetts. The Western Upland—west of the Central Valley—is comprised of hills and valleys that rise to 2,315 feet above mean sea level (msl) in the northwest corner of the State. The Eastern Upland is east of the Central Valley. It is a hilly region cut by many river valleys, but it is much lower in elevation than the Western Upland.

#### 3.5.2 Topography

##### 3.5.2.1 SRMR

SRMR has a varied topography. High points on hills (e.g., Artillery Hill and Pumphouse Hill) are from 210–290 feet above msl (USGS 2018a, 2018b). Low points along water courses (e.g., Fourmile River and Broad Swamp Brook) are as low as 40–70 feet above msl. Water courses on the installation pass along the eastern edge, across the northwestern portion, and toward the center from the western and southern boundaries, with the topography rising to high points from all of those water courses.

##### 3.5.2.2 Camp Niantic

Camp Niantic is generally flat. Its elevation is about 30 feet above msl in the center of the installation, sloping downward toward the installation boundaries, and reaching sea level on the eastern border along the Niantic River and the northwest border along Smith Cove (USGS 2018c).

##### 3.5.2.3 EHRR

The topography of EHRR follows a north-northeast to south-southwest pattern, descending from about 100 feet above msl along the west side of Saltonstall Ridge to about 10 feet above msl along the Farm River, and ascending to about 30–40 feet above msl along North High Street (State Route [SR] 100) (USGS 2018d).

#### 3.5.3 Soils

The soils of the SRMR cantonment area consist of 13 soil series, but soils on sites where potential future construction would occur are of six series: Agawam, Hinckley, Merrimac, Paxton and Montauk, Urban land complex, and Woodbridge. Urban land complex soils have been disturbed to the extent to which they no longer exhibit natural soil horizons; they cover nearly one-third of the cantonment area. The soils of the SRMR training area are of the Paxton and Montauk and Canton and Charlton series. The soils of Camp Niantic are comprised of four series: the Agawam, Hinckley, Ipswich, and Merrimac. The soils on the sites of potential future construction on the EHRR are of the Penwood series. **Table 5** presents the characteristics of these soil series.

Soil Series	Depth	Drainage	Origin	Occurrence	Slope
Agawam	Very deep	Well drained	Outwash	Plains, stream terraces	0-15%
Canton	Very deep	Well drained	Till	Moraines, hills, ridges	0-45%
Charlton	Very deep	Well drained	Till	Moraines, hills, ridges	0-60%
Hinckley	Very deep	Excessively drained	Outwash	Outwash terraces, plains, deltas	0-60%
Ipswich	Very deep	Very poorly drained	Organic deposits	Tidal marshes	0%
Merrimac	Very deep	Somewhat excessively drained	Outwash	Outwash terraces, plains	0-35%
Montauk	Very deep	Well drained	Till	Upland hills and moraines	0-35%
Paxton	Very deep	Well drained	Till	Hills, plains, moraines	0-45%
Penwood	Very deep	Excessively drained	Outwash	Outwash terraces, plains	0-15%
Woodbridge	Very deep	Moderately well drained	Till	Hills, plains, moraines	0-25%

Source: USDA NRCS 2018.

### 3.6 Water Resources

Water resources include surface water, wetlands, floodplains, coastal zones, groundwater, and stormwater. **Figures 8** and **9** show surface waters, wetlands, floodplains, and coastal zones found at SRMR, Camp Niantic, and EHRR.

#### 3.6.1 Surface Water and Wetlands

Surface waters and wetlands on or adjacent to the CTC are shown on **Figures 8** and **9**.

##### 3.6.1.1 SRMR

At SRMR (**Figure 8**), the Fourmile River flows along the eastern boundary of the training area and near the western boundary of the cantonment area (USGS 2018a, 2018b). Goodwin's Pond, which is west of the cantonment area, is on the Fourmile River. Rogers Lake is west of the installation. Two creeks on the installation combine to form Broad Swamp Brook, which flows into Grassy Hill Brook. A tributary of Grassy Hill Brook flows through the northwest portion of the installation.

A large area of wetlands is on the northwest portion of the SRMR cantonment area. A small area of wetlands is along the southeastern edge of the cantonment area. Numerous areas of wetlands are scattered throughout the training area. These generally occur along water courses and in depressions between hilly areas.

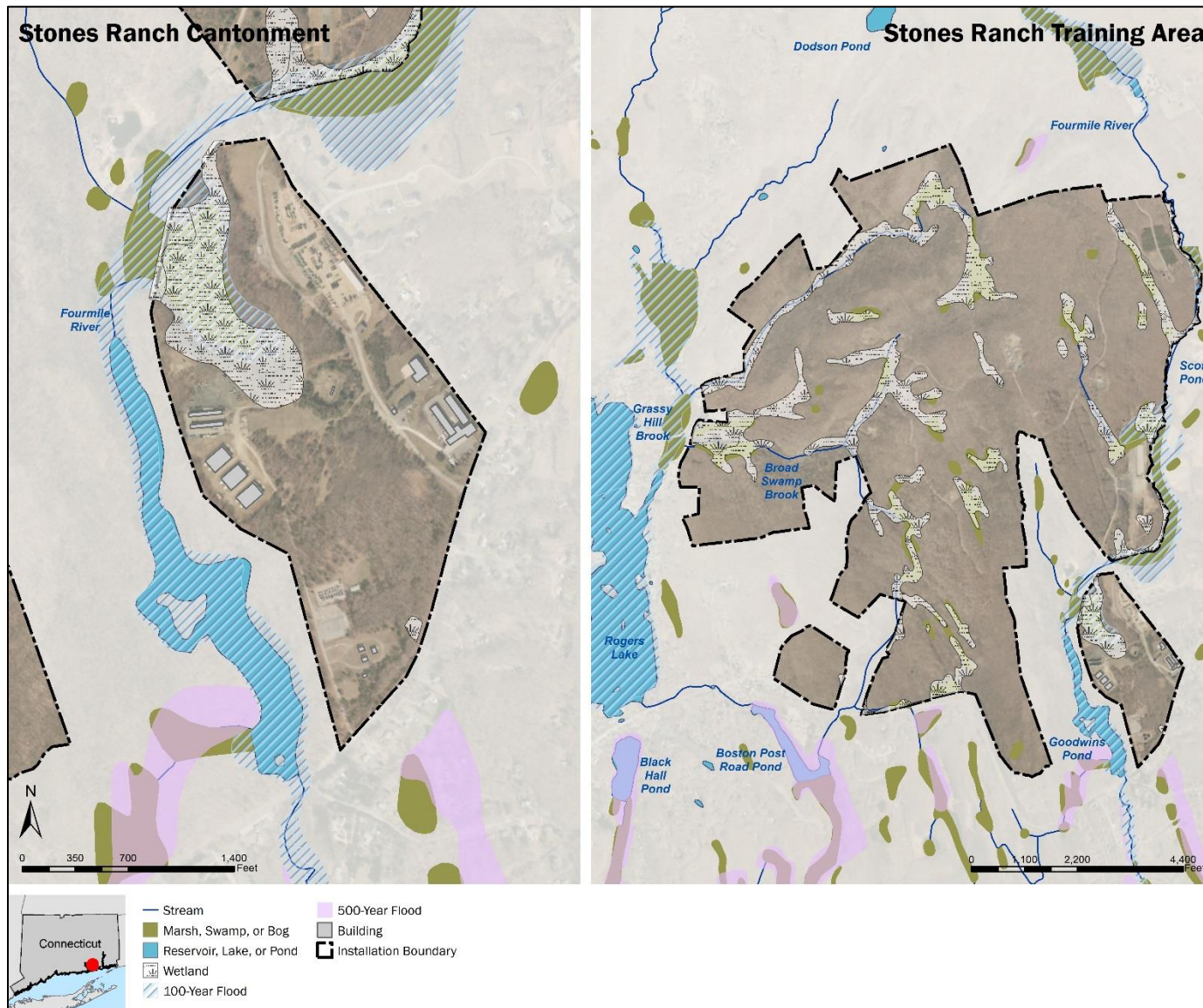


Figure 8. Water Resources at SRMR



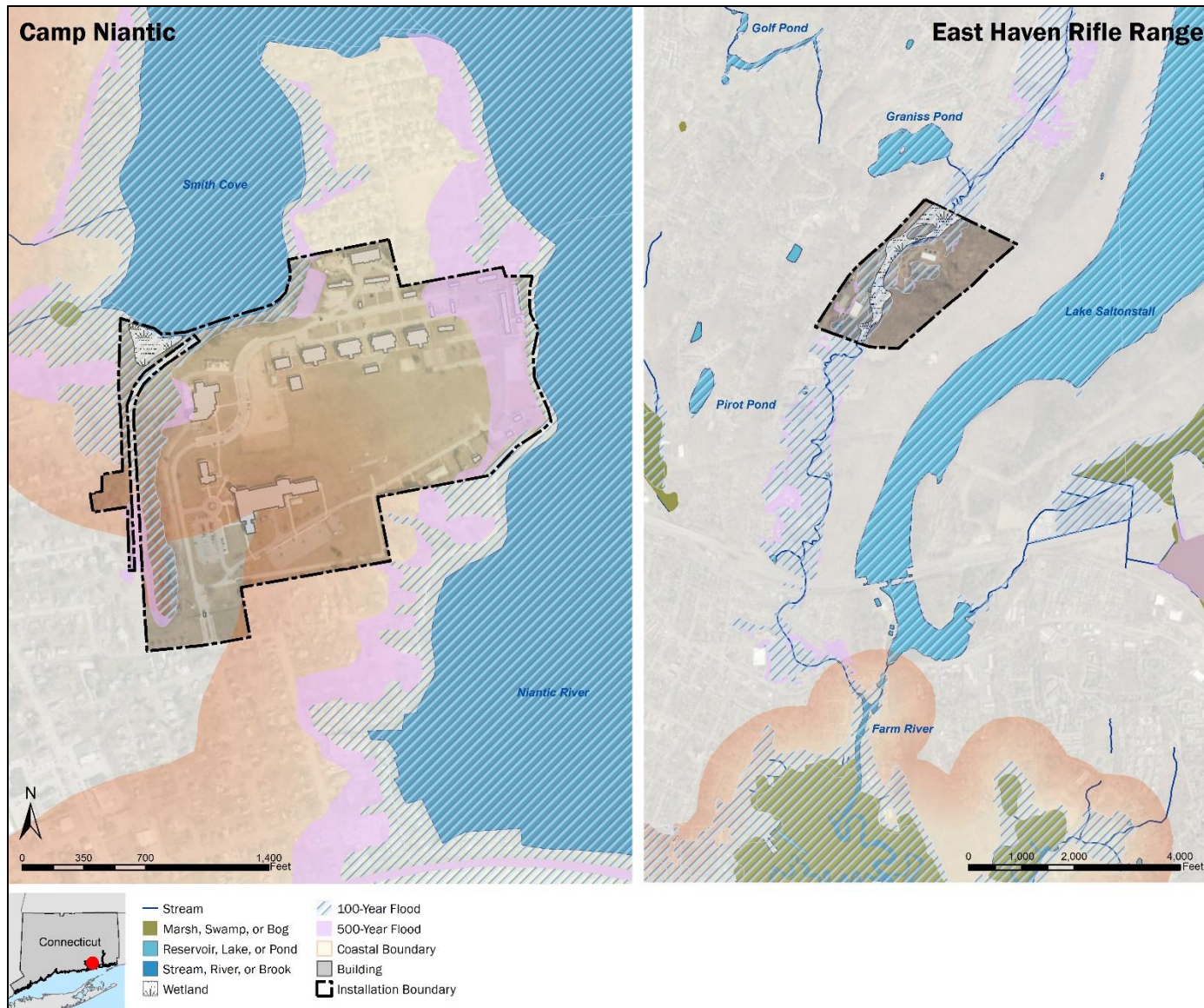


Figure 9. Water Resources at Camp Niantic and EHRR

### 3.6.1.2 *Camp Niantic*

Camp Niantic is bordered on the east by the Niantic River (**Figure 9**) (USGS 2018c). Smith Cove, which branches off the Niantic River, forms the northwest boundary of the installation. No streams, creeks, ponds, or other waterbodies are on Camp Niantic. Camp Niantic has an area of wetlands at the very northwest corner of the installation along the shore of Smith Cove.

### 3.6.1.3 *EHRR*

EHRR is near but separated from Lake Saltonstall by the Saltonstall Ridge (**Figure 9**) (USGS 2018d). The Farm River flows southward through the installation from its northern boundary to its southern boundary and out to Long Island Sound. Wetlands on the EHRR occur within the 100-year floodplain of the Farm River.

## 3.6.2 Floodplains

Floodplains on or adjacent to the CTC are shown on **Figures 8** and **9**. An activity within or affecting a floodplain or that would impact natural or man-made storm drainage facilities located on property that CTDEEP determines to be controlled by the state must submit a flood management plan to CTDEEP.

### 3.6.2.1 *SRMR*

At SRMR, the 100-year floodplain of Fourmile River occupies small areas along the eastern edge of the training area and the northwest portion of the cantonment area (**Figure 8**). No areas of 500-year floodplain are on SRMR.

### 3.6.2.2 *Camp Niantic*

At Camp Niantic, the 100- and 500-year floodplains border Camp Niantic along the Niantic River and Smith Cove (**Figure 9**). The 100-year floodplain of Smith Cove extends southward along the east side of Pine Grove Road nearly to the southern edge of the installation. The 500-year floodplain extends to the western side of Building 47, nearly to the western side of Building 64, and several buildings on the eastern portion of the installation are within the 500-year floodplain.

### 3.6.2.3 *EHRR*

At EHRR, the 100-year floodplain of the Farm River occupies much of the western half of the installation (**Figure 9**). A strip of land along North High Street (SR 100) and the western edge of the installation is above the 100-year floodplain. Minor areas of 500-year floodplain lie outside the 100-year floodplain.

## 3.6.3 Coastal Zone

Connecticut's Coastal Management Program is administered by CTDEEP and approved by the National Oceanic and Atmospheric Administration under the Federal Coastal Zone Management Act (16 USC § 1451 *et seq.*). Under the statutory umbrella of the CCMA, the Program ensures balanced growth along the coast, restores coastal habitat, improves public access, protects water-dependent uses, and more. The Program also regulates work in tidal, coastal, and navigable waters and tidal wetlands under the CCMA (CGS Sections 22a-90 through 22a-112), the Structures Dredging and Fill statutes (CGS Sections 22a-359 through 22a-363f), and the Tidal Wetlands Act

(CGS Sections 22a-28 through 22a-35). Development of the shoreline is regulated at the local level through municipal planning and the zoning boards and commissions under the policies of the CCMA, with technical assistance and oversight provided by Program staff (CTDEEP 2019).

As shown in **Figure 9**, most of Camp Niantic is within the coastal boundary, except for the extreme southwest portion of the installation. SRMR and EHRR are not within the coastal boundary (CTDEEP and CLEAR 2018). The *coastal boundary* is defined as:

A continuous line delineated on the landward side by the interior contour elevation of the one hundred year frequency coastal flood zone, as defined and determined by the National Flood Insurance Act, as amended (42 USC § 4101, P.L. 93-234), or a one thousand foot linear setback measured from the mean high water mark in coastal waters, or a one thousand foot linear setback measured from the inland boundary of tidal wetlands mapped under Section 22a-20, whichever is farthest inland (Connecticut General Assembly, Chapter 444, Section 22a-94(b)).

Connecticut Public Act 18-82, *An Act Concerning Climate Change Planning and Resiliency*, was signed by the governor in 2018. The act new integrates sea level change projections into planning documents. The projections are subject to change not less than every 10 years and are applied to the state's coastal management and flood management laws. The act also expands the definition of "coastal hazard areas" and "coastal boundary." Coastal hazard areas now include areas that are subject to inundation as determined by the most recent sea level rise scenario. Property in the coastal boundary must be flood-proofed. "Flood-proofing" means any combination of structural or nonstructural additions, changes, or adjustments that would reduce or eliminate flood damage to real estate or improved real property, to water and sanitary facilities, and to structures and their contents. New structures or substantially improved structures designed for human habitation within the coastal boundary must include at least two additional feet of freeboard above base flood level plus any additional freeboard to account for the most recent sea level change scenario update.

Potential future construction activities within the coastal boundary would be subject to the provisions of Public Act 18-82 and the Federal consistency requirements of the CCMA and would require a Coastal Consistency Request for Review by CTDEEP's Land and Water Resources Division prior to the project's design/build phase. To demonstrate consistency, the proposed project must be undertaken in a manner consistent with the enforceable policies of the CCMA, which are codified in CGS Sections 22a-90 through 22a-112, as amended. General policies apply to all projects. Additional policies might also apply depending on what type of coastal uses are proposed (e.g., a coastal structure, utility line, or transportation feature), what type of coastal resources might be affected (e.g., shorelands, wetlands, or beaches), and what adverse impacts might occur (e.g., a change in drainage patterns or water quality impact).

The RPMP describes development constraints along Camp Niantic's coast. First, 100- and 500-year floodplains exist in these areas. Secondly, a wetland is present near the coast at Camp Niantic's northwest corner. Third, the Town of East Lyme's Commercial Marine zoning limits development in coastal areas to water-dependent uses that consist of relatively low-intensity activities. The RPMP includes an objective to limit the height of new development along Camp Niantic's coast to comply with this local zoning requirement (Mead & Hunt and Tetra Tech 2018).

### **3.6.4 Groundwater**

The CTDEEP classifies groundwater at the CTC as “GA,” which indicates the waters are suitable for human consumption without treatment (CTDEEP 2013). At SRMR, groundwater has been encountered at 7–13 feet below grade and generally flows to the southwest (MANE JV 2016). Depth to groundwater in wells near Camp Niantic has been measured at 15–16 feet below grade and generally flows to the southeast towards the Niantic River (Parsons 2011). Depth to groundwater has not been measured at EHRR but is presumed to be shallow because of its proximity to the Farm River. Groundwater flow at EHRR is anticipated to be generally toward the Farm River.

### **3.6.5 Stormwater**

#### **3.6.5.1 SRMR**

At SRMR, stormwater drains to the Fourmile River. The stormwater collection system consists primarily of open ditches. There are storm inlets and associated storm sewer pipes in the parking area near the Range Control Building that ultimately drain to an open ditch. There are no stormwater treatment facilities at SRMR.

#### **3.6.5.2 Camp Niantic**

At Camp Niantic, the stormwater collection system includes a combination of storm sewer pipes and open ditches. Stormwater treatment is provided in some areas using swirl separators and infiltration basins. Permeable pavers are installed in some parking areas along Perimeter Drive. There are two main stormwater outfalls at Camp Niantic. One outfall is located on the west side of the base near the Readiness Center and discharges into a wetland after stormwater treatment. The second outfall is located on the east side of the base near the Transient Training Officers Quarters and discharges into the Niantic River after treatment.

#### **3.6.5.3 EHRR**

At EHRR, the stormwater collection system consists of open ditches. Stormwater drainage flows to Farm River. There are no stormwater treatment facilities at EHRR.

## **3.7 Biological Resources**

### **3.7.1 Habitat**

#### **3.7.1.1 SRMR**

SRMR is mostly forested with some wetlands and an old rock quarry (Gomez 2006). The site has five major vegetation communities or habitats: dry grassland, wet grassland, dry coniferous forest, dry deciduous forest, and wet deciduous forest. Dry deciduous forest and wet deciduous forest are the dominant habitat types on SRMR. The wet forests are associated with Fourmile River and its tributaries. The other three vegetation community types are each limited to small areas (less than 50 acres) of contiguous habitat (Hastings 2008).

#### **3.7.1.2 Camp Niantic**

Camp Niantic has three major vegetation communities: dry grasslands, wet grasslands, and wet-deciduous forest. Most of the installation, however, is characterized by landscaped areas, and



native vegetation communities are limited to the installation's perimeter (Gomez 2006). A wooded area runs along the west boundary of the installation (Hastings 2008). There are two tidal areas, one northwest of the installation proper, and the other to the east.

### 3.7.1.3 EHRR

More than two-thirds of EHRR is a New Haven County "intact forest," meaning an unbroken natural landscape of forest ecosystem. The installation has four major vegetation communities: dry grasslands, wet shrublands, and dry- and wet-deciduous forests. Dry grasslands (predominantly mowed lawn areas) and wet-deciduous forest (along the Farm River) are the dominant habitat types (Gomez 2006).

### 3.7.2 Flora

Flora surveys of the CTC were done in 2006 and documented 606 plant species. SRMR had the most species with 397 species representing 253 genera in 88 families, followed by EHRR with 306 species representing 211 genera in 88 families, and Camp Niantic with 207 species representing 150 genera in 59 families. Across the installations, the most common plant groups were sedge (22 species), knotweed (11 species), violet (10 species), panicgrass (9 species), strawbed (8 species), and goldenrod (8 species). The most common tree type was oak with seven species. About 75 percent of species collected were native species; the rest were nonnative species (Hastings 2008).

### 3.7.3 Fauna

Fauna surveys conducted in 2006 at CTC indicated that fauna species richness was greatest at SRMR (108 species), followed by EHRR (63 species) and Camp Niantic (43 species). Birds were the most diverse group, followed by mammals, amphibians, and reptiles (Gomez 2006). **Table 6** lists the number of species of each faunal group observed at each site, with estimated numbers of total species in Connecticut provided for comparison.

Site	Bird	Mammal	Reptile	Amphibian	Total
SRMR	65	21	7	15	108
EHRR	42	11	4	6	63
Camp Niantic	32	8	0	3	43
Connecticut	400	40	28	21	489

Sources: Gomez 2006, Connecticut Wildlife 2018.

Common bird species observed at the CTC sites were American robin (*Turdus migratorius*), common starling (*Sturnus vulgaris*), Northern cardinal (*Cardinalis cardinalis*), wood thrush (*Hylocichla mustelina*), Eastern tufted titmouse (*Baeolophus bicolor*), and gray catbird (*Dumetella carolinensis*). Common mammals observed were the white-footed mouse (*Peromyscus leucopus*), gray squirrel (*Sciurus carolinensis*), Eastern cottontail (*Sylvilagus floridanus*), and white-tailed deer (*Odocoileus virginianus*). The most frequently observed amphibians were the northern red-backed salamander (*Plethodon cinereus*), green frog (*Lithobates clamitans*), wood frog (*Lithobates*

*sylvaticus*), and gray tree frog (*Hyla versicolor*); the eastern garter snake (*Thamnophis sirtalis*) was the most commonly observed reptile species at the training sites (Gomez 2006).

### 3.7.4 Threatened and Endangered Species

No species listed under the ESA are known to occur at the CTC. The USFWS Information for Planning and Conservation (IPaC) website, however, reports three ESA-listed species as potentially occurring at the CTC. These species are shown in **Table 7** and discussed below. The IPaC resource lists are in **Appendix C**.

**Northern Long-Eared Bat (*Myotis septentrionalis*).** The northern long-eared bat is listed as threatened under the ESA. It is found across much of the eastern and north-central United States and all Canadian provinces from the Atlantic Coast west to the southern Northwest Territories and eastern British Columbia (USFWS 2018d). During summer, northern long-eared bats roost singly or in colonies underneath bark, in cavities, or in crevices of both live and dead trees. It has been found, although rarely, roosting in structures like barns and sheds. Northern long-eared bats are active from late spring to early fall and spend winter hibernating in caves and mines. They typically use large caves or mines with large passages and entrances, constant temperatures, and high humidity with no air currents. Northern long-eared bats emerge at dusk. They fly through the understory of forested hillsides and ridges feeding on insects (USFWS 2018a). The species has not been recorded at the CTC (Gomez 2006); however, the CTARNG assumes its presence and is planning to conduct a survey for it (Dollak 2019, personal communication).

**Table 7. Federally Listed Species Potentially Occurring at the CTC**

Common Name	Scientific Name	Type	Federal Status	Critical Habitat on CTC?	Potential Location
Northern long-eared bat	<i>Myotis septentrionalis</i>	Mammal	Threatened	No	SRMR, CN, EHRR
Roseate tern	<i>Sterna dougallii dougallii</i>	Bird	Endangered	No	CN
Small whorled pogonia	<i>Isotria medeoloides</i>	Flowering Plant	Threatened	No	SRMR, CN

Sources: USFWS 2018a, 2018b, 2018c.

Note: CN=Camp Niantic.

**Roseate Tern (*Sterna dougallii dougallii*).** The roseate tern is an ESA-listed endangered seabird that is mainly found in the Northern Hemisphere on the northeastern coast of North America, extending from Nova Scotia to the southern tip of Florida and several islands in the Caribbean Sea (USFWS 2011, 2018e). Roseate terns nest on small barrier islands, often at ends or breaks, or in hollows or under dense vegetation, debris, or rocks hidden from predators. The species in northeastern North America almost always nests in colonies with common terns. Roseate terns begin arriving to breeding areas at the end of April and begin migrating south from late August to early September. The most recent survey of birds was in 2006 and the species was not recorded at the CTC (Gomez 2006); however, it is possible roseate terns nesting on barrier islands offshore could forage or roost near the shore at Camp Niantic from late April to August or early September.

**Small Whorled Pogonia (*Isotria medeoloides*).** The small whorled pogonia is an ESA-listed threatened plant species that is a member of the orchid family (USFWS 2016b, 2018f). It is widely distributed but rare in 18 eastern US states and Ontario, Canada. Populations are typically small with less than 20 plants. It usually has a single stem that grows to 10–14 inches tall and has a whorl of five or six leaves near the top of the stem. One or two greenish-yellow flowers appear above the stem in May or June. The fruit appears later in the year. It grows in aged hardwood stands of beech, birch, maple, oak, and hickory that have an open understory, and sometimes in stands of softwoods such as hemlock. It prefers acidic soils with a thick layer of dead leaves, often on slopes near small streams. The most recent survey of flora at the CTC was in 2008, and this species was not recorded (Hastings 2008). The hardwood stands at SRMR and Camp Niantic typically have a dense understory (Dollak 2019, personal communication), and thus it is considered unlikely that the species would be present.

### 3.7.5 Migratory Birds

EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, was issued in 2001 and directs Federal agencies that take actions either directly or indirectly effecting migratory birds to develop a Memorandum of Understanding (MOU) with USFWS and other federal agencies and to work with them to promote the conservation of migratory bird populations.

Pursuant to EO 13186, DoD signed an MOU with USFWS in 2014 to promote the conservation of migratory bird populations while sustaining the use of military lands and airspace for testing, training, and operations. The MOU pertains to military nonreadiness activities, including facility construction, renovation, maintenance, and operation. The MOU defines the specific responsibilities of the DoD, USFWS, and both parties jointly to conserve migratory bird species and their habitats when conducting activities covered by the MOU (DoD and USFWS 2014).

Migratory birds are also protected under the MBTA, which makes it illegal for anyone to take any migratory bird or the parts, nests, or eggs of that bird except under the terms of a valid permit issued pursuant to Federal regulations (USFWS 2017b). The migratory bird species protected by the MBTA are listed in 50 CFR 10.13, *List of Migratory Birds*. Multiple species of migratory birds have been recorded at the CTC. **Table 8** presents some of the most common species.

Common Name	Scientific Name	SRMR	Camp Niantic	EHRR
American crow	<i>Corvus brachyrhynchos</i>		✓	
American goldfinch	<i>Spinus tristis</i>	✓		
American robin	<i>Turdus migratorius</i>	✓	✓	✓
Black-capped chickadee	<i>Poecile atricapillus</i>	✓		
Blue jay	<i>Cyanocitta cristata</i>		✓	✓
Brown-headed cowbird	<i>Molothrus ater</i>	✓		
Canada goose	<i>Branta canadensis</i>	✓		
Chipping sparrow	<i>Spizella passerina</i>	✓		
Common grackle	<i>Quiscalus quiscula</i>	✓		

Common Name	Scientific Name	SRMR	Camp Niantic	EHRR
Eastern towhee	<i>Pipilo erythrophthalmus</i>	✓		
Eastern tufted titmouse	<i>Baeolophus bicolor</i>	✓		✓
Eastern wood-pewee	<i>Contopus virens</i>	✓		
Gray catbird	<i>Dumetella carolinensis</i>	✓		✓
Herring gull	<i>Larus argentatus</i>		✓	
Mallard	<i>Anas platyrhynchos</i>		✓	
Mourning dove	<i>Zenaida macroura</i>			✓
Northern cardinal	<i>Cardinalis</i>	✓	✓	✓
Ovenbird	<i>Seiurus aurocapilla</i>	✓		
Pine siskin	<i>Spinus pinus</i>	✓		
Red-eyed vireo	<i>Vireo olivaceus</i>	✓		
Scarlet tanager	<i>Piranga olivacea</i>	✓		
Veery	<i>Catharus fuscescens</i>	✓		
White-breasted nuthatch	<i>Sitta carolinensis</i>	✓		
Wood thrush	<i>Hylocichla mustelina</i>	✓		✓

Sources: USFWS 2013; Gomez 2006.

The Bald and Golden Eagle Protection Act (BGEPA) (16 USC §§ 668-668c) prohibits anyone without a permit issued by the Secretary of the Interior from taking bald eagles (*Haliaeetus leucocephalus*) or golden eagles (*Aquila chrysaetos*), including their parts, nests, or eggs (USFWS 2016a). Although the USFWS reports that bald eagles have the potential to occur in the vicinity of all three CTC sites (USFWS 2018a, 2018b, 2018c), no bald eagles have been recorded at any of them (Gomez 2006; Dollak 2019, personal communication).

### 3.7.6 State-Listed Species

**Table 9** provides the most current list of State-listed species known to occur at CTC sites, which is based on surveys conducted in 2006 for fauna and 2007 for flora. For species listed by the CTDEEP under the Connecticut ESA as State Endangered, Threatened, or Special Concern, four species of mammals, one species of bird, three species of reptiles and amphibians, and six plant species have been documented at the CTC.

Common Name	Scientific Name	State Listing	Site
<b>MAMMALS</b>			
Red bat	<i>Lasiurus borealis</i>	Special Concern	SRMR, EHRR
Eastern small-footed bat	<i>Myotis leibii leibii</i> <sup>a</sup>	Endangered	SRMR, EHRR

**Table 9. State-Listed Species Observed at the CTC**

Common Name	Scientific Name	State Listing	Site
Little brown bat	<i>Myotis lucifugus</i> <sup>a</sup>	Endangered	SRMR, EHRR
Southern bog lemming	<i>Synaptomys cooperi</i>	Special Concern	SRMR
<b>BIRDS</b>			
Whip-poor-will	<i>Caprimulgus vociferus</i>	Special Concern	SRMR
<b>REPTILES AND AMPHIBIANS</b>			
Jefferson salamander	<i>Ambystoma jeffersonianum</i>	Special Concern	SRMR
Northern leopard frog	<i>Rana pipiens</i>	Special Concern	EHRR
Eastern box turtle	<i>Terrapene carolina carolina</i>	Special Concern	EHRR
<b>PLANTS</b>			
Sweet-scented Indian plantain	<i>Senecio suaveolens</i>	Endangered	EHRR
Dioecious sedge	<i>Carex sterilis</i>	Special Concern	SRMR
Field paspalum	<i>Paspalum laeve</i>	Threatened	SRMR
Red pine	<i>Pinus resinosa</i> <sup>b</sup>	Endangered	SRMR
Northern arrowhead	<i>Sagittaria cuneata</i>	Endangered	SRMR
Georgia bulrush	<i>Scirpus georgianus</i>	Special Concern	SRMR

Sources: CTDEEP 2015a, 2015b; Gomez 2006; Hastings 2008.

Notes:

a Needs further evaluation to determine if this is a valid identification.

b Only native populations are protected (i.e., landscape specimens are not protected).

Bat species were identified by echolocation and the little brown myotis (*Myotis lucifugus*) and eastern small-footed bat (*Myotis leibii leibii*)—both Connecticut Species of Special Concern—cannot reliably be distinguished from one another by their calls (Gomez 2006). Therefore, it is possible one or both species occur at the CTC.

### 3.8 Cultural Resources

Cultural resources are physical manifestations of human culture and history such as archaeological sites, historic properties and districts, and traditional cultural properties. They also include locations of important historic events and aspects of the natural environment such as natural features of the land or biota that are part of traditional ways of life. Cultural resources are historic properties as defined by the NHPA; cultural items as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC § 3001 *et seq.*); archaeological resources as defined by the Archaeological Resources Protection Act (16 USC §§ 470aa–470mm); sacred sites as defined by EO 13007, *Indian Sacred Sites*, to which access is afforded under the American Indian Religious Freedom Act (42 USC §§ 1996 and 1996a); and collections and associated records as defined by 36 CFR Part 79, *Curation of Federally Owned and Administered Archaeological Collections*.

As a Federal agency, DoD has a trust responsibility to Tribes to protect tribal cultural resources and to consult with Tribes on a government-to-government basis regarding those resources. Section 101(d)(6) of the NHPA mandates that Federal agencies consult with Tribes and other

Native American groups who either historically occupied the project area or may attach religious or cultural significance to historic properties in the region. DoD Instruction (DoDI) 4710.02, *Department of Defense Interactions with Federally Recognized Tribes* (14 September 2006), outlines tribal consultation protocols and actions to respect the significance that Tribes ascribe to resources of traditional cultural or religious importance.

The National Register of Historic Places (NRHP) is a listing of historic properties that have been evaluated according to the standards in 36 CFR Part 60.4, *Criteria for Evaluation*, and found to meet criteria of significance and integrity. Generally, resources evaluated for eligibility are at least 50 years old, although there are exceptions. As described in Section 3.8.1, all buildings at the CTC that are at least 50 years old or that will be 50 years old by 2021 have been evaluated for eligibility for listing on the NRHP and found to be ineligible. The SHPO has concurred with these findings.

CTARNG cultural resources at the CTC are managed according to Chapter 6 in AR 200-1, *Cultural Resources Management*. As required by this regulation, the CTARNG developed the *Integrated Cultural Resources Management Plan for Sites and Training Installations of the Connecticut Army National Guard, Fiscal Years 2016–2021* (E2M 2016). It is a comprehensive plan that defines the responsibilities, requirements, and methods for managing cultural resources at the CTC and provides SOPs for preservation of cultural resources within the context of the CTARNG mission.

### **3.8.1 Cultural Resources at the CTC**

This section provides a summary of relevant information related to cultural resources at the three installations at the CTC and the recorded cultural resources at each. All of this information is derived from the ICRMP (E2M 2016).

#### **3.8.1.1 SRMR**

Although several areas of the SRMR have undergone major ground disturbance, much of the training site remains undisturbed. Based on a predictive archaeological model for SRMR, the property is considered to retain medium potential for archaeological resources to be present. A total of 180 acres have been archaeologically surveyed, and eight archaeological sites have been documented. Further investigation of these areas has been recommended to make determinations of eligibility for listing on the NRHP.

An historic structure evaluation analyzed the six structures on SRMR that are at least 50 years old for their eligibility to be listed on the NRHP: the UTES (1941), Building 5 (1942), the North and South buildings of the Lower Garage area (1934), the Maintenance Barn (c. 1885), and Range Control (c. 1885). None of the buildings were deemed eligible for listing, and the SHPO concurred with this finding. No other buildings on the site have been evaluated for eligibility to be listed on the NRHP; however, no additional buildings will be 50 years old by 2021, so no further evaluation is needed at this time.

SRMR has not been surveyed to determine whether it includes a historic district or historic landscape. There are no cemeteries or known resources of traditional, religious, or cultural significance on the installation.

### 3.8.1.2 *Camp Niantic*

Based on a predictive archaeological model for Camp Niantic, the property is considered to retain high potential for prehistoric and historic archaeological resources to be present. The entire installation has been archaeologically surveyed, and five archaeological sites have been documented. One site has been determined to be eligible for listing on the NRHP. Further investigation of the remaining four sites has been recommended to make determinations of eligibility for listing on the NRHP.

Camp Niantic contains 37 buildings and structures, of which 14 are at least 50 years old. All of them have been evaluated for eligibility to be listed on the NRHP, and none was determined to be eligible. The SHPO concurred with this finding. Two additional buildings or structures will be 50 years old by 2021; however, they have already been determined to be ineligible for NRHP listing, so no further evaluation is needed.

Camp Niantic has not been surveyed to determine whether it includes a historic district or historic landscape. There are no cemeteries or known resources of traditional, religious, or cultural significance on the installation.

### 3.8.1.3 *EHRR*

An archaeological reconnaissance survey of the entire EHRR was conducted in 2002. The survey found no archaeological sites and concluded that no further archaeological investigations are warranted unless specific earthen berms associated with historic use of the property were to be disturbed.

EHRR contains eight buildings and structures, one of which is at least 50 years old. All eight were evaluated by the SHPO for eligibility to be listed on the NRHP in 2007, and none was determined to be eligible. No additional buildings or structures will be 50 years old by 2021 and, since all buildings at EHRR have already been determined ineligible for NRHP listing, no further evaluation is needed.

This training installation has not been surveyed to determine whether it includes a historic district or historic landscape. There are no cemeteries or known resources of traditional, religious, or cultural significance on the installation.

## 3.8.2 **Native American Consultation**

There are no known resources of traditional, religious, or cultural significance; sacred sites; or traditional cultural properties located at the CTC. There are two Federally recognized Tribes, however, with whom the CTARNG conducts consultation: the Mashantucket Pequot Tribal Nation and the Mohegan Tribal Nation. In accordance with DoDI 4710.02, the CTARNG is consulting with these Federally recognized Tribes. A Memorandum for Record summarizing Native American consultation activities and copies of all correspondence related to the consultation are included in **Appendix B**. The Mohegan Tribal Nation responded to a consultation letter sent to them on 21 September 2018 (**Appendix B**). The Mashantucket Pequot Tribal Nation and the Mohegan Tribal Nation will be sent copies of the Final EA.

### 3.8.3 Coordination with Connecticut SHPO

The CTARNG will consult with the SHPO on a project-by-project basis for the individual projects included in the RPMP once project plans are developed, according to procedures outlined in the ICRMP (E2M 2016).

## 3.9 Socioeconomics

Socioeconomics refers to how economic activity affects and is shaped by social processes. Population, employment, and income are socioeconomic indicators that influence other economic components such as demand for housing and public services. Socioeconomic data for the communities bordering the CTC installations (East Lyme, Lyme, Old Lyme, and East Haven) are addressed in this section. Socioeconomic data for New Haven and New London counties, the State of Connecticut, and the United States are included for comparative purposes. Public and occupational health and safety and the protection of children are also addressed in this section.

### 3.9.1 Population and Demographics

Approximately 20 employees work at the CTC. Because no housing is provided on the installations, all employees commute from the surrounding areas (Dollak 2018, personal communication). The number of people on the CTC installations fluctuates throughout the year depending on the number of military personnel temporarily stationed there for training. The towns of East Lyme, Lyme, Old Lyme, and East Haven and the surrounding area in New Haven and New London counties have sufficient infrastructure, shopping, housing choices, medical facilities, recreational opportunities, and public schools to meet the socioeconomic needs of CTC employees and visitors.

**Table 10** shows socioeconomic information for the towns and counties surrounding the CTC installations, as well as State and national data for comparison. Connecticut is a slow-growth State, with larger population increases occurring in urban areas, so long-term growth prospects for the region around CTC are moderate (MDG 2016). As shown in **Table 10**, Connecticut's population grew 0.4 percent between 2010 and 2017, and East Haven, East Lyme, and Old Lyme declined slightly. Lyme's population growth of 3 percent stands out in comparison but, with its small population, this reflects a total population increase of about 70 people.

Category	East Haven	East Lyme	Lyme	Old Lyme
Population estimates (1 July 2017)	28,857	18,789	2,392	7,432
Population, percentage change (1 April 2010–1 July 2017)	-1.2%	-1.9%	3.0%	-2.2%
Median household income, in 2016 dollars	\$63,137	\$85,872	\$89,643	\$87,971
In civilian labor force, percent population age 16+	64.7%	59.0%	62.0%	61.5%
Unemployment Rate, 2017 annual	5.2%	4.2%	3.6%	3.9%
Mean travel time to work (min), workers age 16+	23.3	23.8	28.8	30.0



**Table 10. Regional Population and Demographics**

Category	East Haven	East Lyme	Lyme	Old Lyme
Category	New Haven County	New London County	Connecticut	United States
Population estimates (1 July 2017)	860,435	269,033	3,588,184	325,719,178
Population, percentage change (1 April 2010–1 July 2017)	-0.2%	-1.8%	0.4%	5.5%
Median household income, in 2016 dollars	\$62,715	\$67,574	\$71,755	\$55,322
In-civilian labor force, percent population age 16+	65.6%	65.3%	66.9%	63.1%
Unemployment Rate, 2017 annual	5.0%	4.5%	4.7%	4.4%
Mean travel time to work (min), workers age 16+	24.6	23.2	25.7	26.1

Sources: US Census Bureau 2018a, 2018b; BLS 2018.

The populations of East Lyme, Lyme, and Old Lyme have a higher median household income than the State and nation, with a lower percentage of the population in the civilian labor force and lower unemployment rates than Connecticut and the United States. East Haven's median household income is lower than the State's median, but higher than the nation's median. It has a higher percentage of the population in the labor force than East Lyme, Lyme, and Old Lyme, as well as a higher unemployment rate. Mean commuting times vary by a maximum of only 7 minutes, ranging from a low of 23 minutes to a high of 30 minutes, which is similar to the State and national mean commuting times of 25 to 26 minutes.

### 3.9.2 Public and Occupational Health and Safety

Health and safety issues include the welfare of the public at large and the protection of personnel working and training at the CTC installations. The CTARNG ensures public and occupational health and safety at its installations through established procedures that limit public access to the installations and to potentially hazardous areas within its boundaries. The CTARNG is responsible for law enforcement patrols at CTC and reports issues to local law enforcement. The closest medical facility to SRMR and Camp Niantic is the Lawrence Memorial Hospital about 10 miles east in New London. The closest medical facility to EHRR is the Yale New Haven Hospital about 6 miles west in New Haven.

### 3.9.3 Protection of Children

On 21 April 1997, President Clinton issued EO 13045, which seeks to protect children from disproportionately incurring environmental health or safety risks. The EO recognizes that a growing body of scientific knowledge demonstrates that children might suffer disproportionately from environmental health and safety risks. These risks arise because children's bodily systems are not fully developed and because their behavior patterns can make them more susceptible to accidents. On the basis of these and other factors, President Clinton directed each Federal agency to make it a high priority to identify and assess environmental health and safety risks that might disproportionately affect children and to ensure that its policies, programs, activities, and standards address any disproportionate risks to children.

The CTARNG fully complies with EO 13045 by incorporating these concerns into its decision-making process for CTC policies, programs, projects, and activities. This process ensures that the CTARNG would identify, disclose, and respond to potential adverse social and environmental effects on children in the CTC area.

While single-family homes are located adjacent to or near the CTC installations, no family housing is located on the installations. Children can be present at Camp Niantic during special events such as Boy Scouts of America camporees, Junior Reserve Officers' Training Corps (JROTC) leadership camps, and Teen Training Weekends or as visitors with families of eligible DoD or State personnel renting rooms for a weekend vacation. Precautions are taken for child safety that include fencing, limiting access to certain areas, and requiring adult supervision.

### 3.10 Environmental Justice

On 11 February 1994, President Clinton issued EO 12898, the purpose of which is to avoid placing disproportionately adverse environmental, economic, social, or health effects from Federal Proposed Actions and policies on minority and low-income populations. The first step in analyzing this issue is to identify minority and low-income populations that might be affected by implementing the Proposed Action or its considered alternatives. Demographic information on ethnicity, race, and economic status is provided in this section as the baseline against which potential environmental justice effects can be identified and analyzed.

The term "minority population" includes individuals who identify themselves as American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian and Other Pacific Islander, and persons of two or more races. Per CEQ environmental justice guidance:

Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of these thresholds (CEQ 1997, p. 25).

To identify potential environmental justice populations, researchers collected data on minority populations from the US Census Bureau for the affected area, which is identified as the census tracts including and bordering the CTC installations. *Census tracts* are small subdivisions of a county or equivalent entity, generally with a population between 1,200 and 8,000. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data (US Census Bureau 2018a).

**Table 11** presents the minority population data for the census tracts, as well as for the towns and counties surrounding the CTC installations and for the State and the nation. Based on these data, none of the census tracts have minority populations exceeding 50 percent. Using the nation and the State as representative of the general population, several of the census tracts (1806.01, 7161.01, and 8707.04) have population percentages of two or more races higher than those of the nation and the State, and one (7161.01) has an Asian population percentage higher than the nation and the State. Using the counties and towns as representative of other appropriate units of geographic analysis, several of the census tracts (1804, 1806.01, 7161.01, and 8707.04) have

higher populations of Black or African American, Asian, Hispanic or Latino, or individuals of two or more races.

**Table 11. Percent Minority and Percent of the Population by Race**

Area	Minority (percent)	White (percent)	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Two or More Races	Hispanic or Latino <sup>a</sup>
United States	23.4	76.6	13.4	1.3	5.8	0.2	2.7	18.1
Connecticut	19.7	80.3	11.9	0.5	4.8	0.1	2.4	16.1
New Haven County	22.1	77.9	14.7	0.5	4.3	0.1	2.4	18.1
New London County	16.4	83.6	6.9	1.2	4.6	0.2	3.6	10.6
East Haven	15.6	84.4	2.6	0.1	3.9	0	3.0	13.2
East Lyme	15.3	84.7	3.2	0	5.4	0	3.5	7.6
Lyme	2.6	97.4	0	0	1.8	0	0.8	2.8
Old Lyme	5.0	95.0	1.3	0	2.4	0	0.9	1.0
Camp Niantic, Census Tract 8707.04	9.3	90.7	1.2	0	0	0	6.8	6.1
EHRR, Census Tract 1804	14.2	85.8	7.2	0	3.0	0	0	10.8
EHRR, Census Tract 1806.01	4.4	95.6	0.8	0	0.6	0	3.0	7.9
SRMR, Census Tract 6501	2.6	97.4	0	0	1.8	0	0.8	2.8
SRMR, Census Tract 6601.01	2.2	97.8	0	0	0.6	0	1.6	2.3
SRMR, Census Tract 6601.02	7.0	93.0	2.3	0	3.8	0	0.3	0
SRMR, Census Tract 7161.01	23.6	76.4	8.4	0	6.5	0	4.2	6.8

Sources: US Census Bureau 2018a, 2018b.

Note:

a Hispanics may be of any race, so also are included in applicable race categories.

Per CEQ guidance, poverty thresholds established by the US Census Bureau are used to identify low-income populations (CEQ 1997). The US Census Bureau defines a *poverty area* as a census tract where 20 percent or more of the residents have incomes below the poverty threshold and an *extreme poverty area* as a census tract with 40 percent or more of the population below the poverty level. **Table 12** presents the percentage of persons with income below poverty level for the census tracts that border or encompass the CTC installations, as well as for the towns surrounding the CTC installations. The table provides data for the counties, State, and nation for comparison. None of the census tracts or towns meet the definition of a poverty area or an extreme poverty area, as the percent of the population below the poverty level is well below the 20- and 40-percent thresholds, respectively. The census tracts and towns also have lower percentages of residents below the poverty level than New Haven and New London counties, Connecticut, and the United States.

<b>Area</b>	<b>Percent of Population with Income below Poverty Level</b>
United States	12.7
Connecticut	9.8
New Haven County	11.4
New London County	9.3
East Haven	9.2
East Lyme	3.9
Lyme	2.0
Old Lyme	2.3
Camp Niantic, Census Tract 8707.04	5.9
EHRR, Census Tract 1804	0
EHRR, Census Tract 1806.01	7.1
SRMR, Census Tract 6501	2.0
SRMR, Census Tract 6601.01	0.1
SRMR, Census Tract 6601.02	1.8
SRMR, Census Tract 7161.01	2.0

Sources: US Census Bureau 2018a, 2018b.

### 3.11 Infrastructure

Infrastructure serving the CTC includes buildings, utilities, and the transportation network.

#### 3.11.1 Buildings

##### 3.11.1.2 SRMR

Buildings at SRMR include the UTES complex and Training Center facilities. The oldest buildings date to 1934, although the existing buildings were built in various years and are of varying quality and function. A condition assessment was conducted recently of some SRMR buildings and most were found to be in good or fair condition, although a few are in poor condition (Mead & Hunt and Tetra Tech 2018).

##### 3.11.1.2 Camp Niantic

Camp Niantic contains a broad range of facilities dating back to 1926, most of which serve Training Center requirements. Camp Niantic also hosts non-Training Center events for the 85th Troop Command, 192nd Military Police, 169th Regional Training Institute, and Joint Force Headquarters Medical Detachment. The condition of most of Camp Niantic's buildings has recently been assessed and most are in good or fair condition, although a few are in poor condition (Mead & Hunt and Tetra Tech 2018).

##### 3.11.1.3 EHRR

EHRR's buildings all serve Training Center requirements. The range is a vital requirement for the CTARNG's small arms training program. The primary building on-site dates to 1939 and is in fair

condition. Other buildings at EHRR were assessed recently and are in good condition or have not been assessed (Mead & Hunt and Tetra Tech 2018).

### 3.11.2 Utilities

Utilities at the CTC include electricity, water, wastewater, heating, and communications. Stormwater infrastructure is described in **Section 3.6.5**.

Electrical service at SRMR and Camp Niantic are provided by Eversource Energy and distributed by overhead and underground distribution. Both systems are adequate to meet existing demand; however, they would require upgrades to accommodate any substantial increase in demand. EHRR's electrical service is provided by United Illuminating, and the electrical infrastructure is adequate to support current and future electrical needs.

SRMR and Camp Niantic obtain potable water, including water for fire suppression, from the East Lyme Water Department. SRMR also has one nonpotable well that supplies water to an equipment washrack. Water supply for future projects at SRMR would require extending the existing water distribution system. Camp Niantic's water was supplied by wells until 2011 and the recently installed water infrastructure should be adequate to accommodate future development. EHRR obtains potable water from the South Central Connecticut Water Authority. The on-post distribution system is limited but should be able to accommodate future development; however, if needed, a main water line situated off-post could be tapped.

SRMR is not connected to a public sewer system and uses three septic systems. Should future development require new wastewater infrastructure, it could be tied into the East Lyme Sewer Department sanitary sewer located off-post. The CTARNG owns and operates Camp Niantic's sanitary sewer collection system, but wastewater is conveyed off-post for treatment. EHRR receives domestic wastewater service from the Greater New Haven Water Pollution Control Authority. The publicly owned gravity sewer main bisecting the range should be able to accommodate future development.

SRMR and Camp Niantic do not have natural gas service and primarily use fuel tanks for heating.

Communication services are available on each of the CTC installations; however, not all buildings at SRMR have communication services. Communication infrastructure is primarily underground.

### 3.11.3 Transportation

The on-post transportation network at the CTC includes paved roads, unpaved roads, parking lots, sidewalks, and an airfield in the southeast portion of the SRMR training area (**Figures 2 to 5**). Road networks within the SRMR cantonment area and Camp Niantic are relatively dense, while roads within the SRMR training area and EHRR are relatively sparse. The SRMR cantonment area has three access control points, and the training area has one. Camp Niantic has two access control points and EHRR has one.

Several features of the existing transportation system at the CTC are not optimized. For example, the SRMR cantonment area connects to the training area via Stone Ranch Road, but Soldiers must exit and reenter the installation as they leave one area and go to the other. During drill weekends, parking can be near capacity. The bridge on Stones Ranch Road across the Fourmile River is weight-restricted and does not accommodate tracked vehicles. At Camp Niantic, access to two private residences located southeast of the base is through the base.

The off-post transportation network is primarily characterized by paved roads built to accommodate various levels of traffic. Major roads in the area include US Highway 1 (Boston Post Road) south of the SRMR cantonment area, State Highway 161 (Pennsylvania Avenue) west of Camp Niantic, and North High Street (SR 100) west of EHRR. Interstate 95 is the major regional connector in the area (**Figure 1**). The CTC is also located near civilian airports in the neighboring cities of New Haven and Groton, CT.

### 3.12 Hazardous and Toxic Materials and Waste

The term “hazardous materials” refers to substances defined as hazardous by CERCLA, and the term “hazardous waste” refers to wastes defined as hazardous by the Solid Waste Disposal Act, as amended by RCRA. Hazardous materials are substances that, because of their quality, concentration, or physical, chemical, or infectious characteristics, could present substantial danger to public health or the environment when released into the environment. Petroleum products—including petroleum-based fuels, oils, and their wastes—are not covered under CERCLA but are covered under RCRA in some instances and are addressed in this section.

Hazardous materials are used at the CTC installations for vehicle maintenance and fueling, heating, elevator operation, munitions, explosive demolition, landscape maintenance (e.g., pesticides and fertilizers), and other activities. Aboveground storage tanks containing gasoline, diesel, and hydraulic oil are found on the installations. Aqueous film-forming foam, a firefighting agent, is not used at the CTC.

SRMR has two sites identified as RCRA Conditionally Exempt Small Quantity Generators (CESQGs): the CTARNG UTES (EPA ID: CTD982544512) and the Connecticut Military Department Organizational Maintenance Shop 6 (EPA ID: CTD983869777). Camp Niantic is also a CESQG (EPA ID: CTD983869793) (EPA 2018a). CESQGs generate no more than 220 pounds (100 kilograms) of hazardous waste per month. EHRR generates no hazardous waste.

Hazardous materials and waste at CTC installations are managed in accordance with the Hazardous Material and Waste Management Plan (NGB 2016) and applicable local, State, and Federal regulations. That plan addresses a variety of topics related to hazardous materials and waste management and disposal, including applicable regulations, roles and responsibilities, storage, labeling, training, inspections, recordkeeping, and spill response procedures.

Multiple areas of concern for hazardous releases to soil and groundwater at CTC have been investigated over the years. Many areas have been found not to require remediation. At SRMR, contamination requiring remediation was identified at the UTES and lower garage. Affected soil was removed and disposed of off-site. Groundwater monitoring is ongoing at the UTES, although contamination concentrations are relatively low (MANE JV 2016). At EHRR, a 2007 investigation found lead and antimony (a metal) concentrations exceeding State action levels in some samples. These findings are consistent with the site’s use as a firing range and further action need only be taken if ground-disturbing activities such as construction are planned (CTARNG 2009). No contamination has been found at Camp Niantic. **Figure 10** shows areas where investigations have occurred.

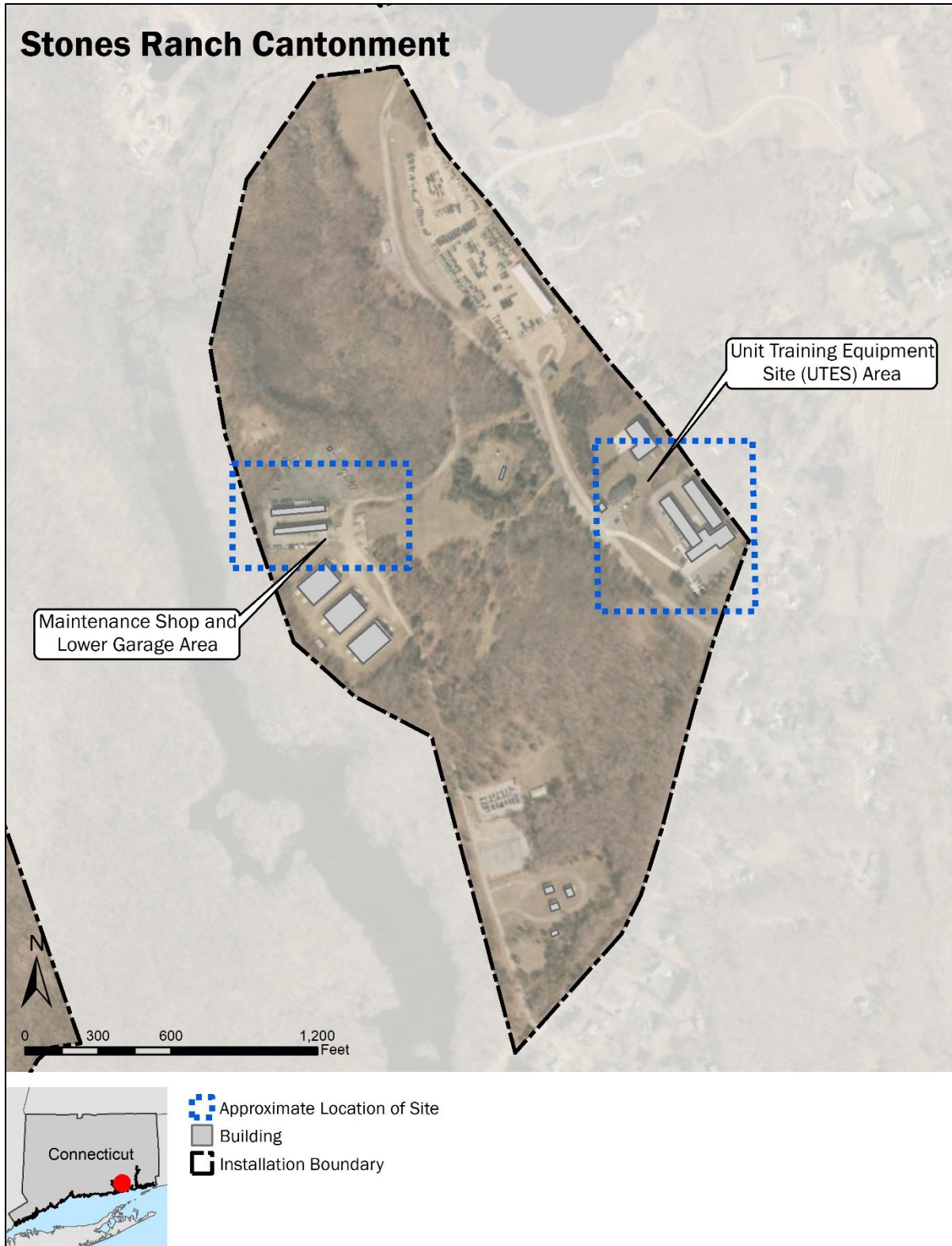


Figure 10. Areas of Investigation for Hazardous Material

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## 4.0 Environmental Consequences

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This section describes the direct, indirect, and cumulative impacts, or environmental consequences, of the Proposed Action and No Action Alternative as well as the BMPs and, when appropriate, mitigation measures that would be implemented to manage impacts. BMPs are not project specific and are not separate from the Proposed Action. Mitigation measures are actions necessary to reduce the level of identified effects to *less-than-significant* levels.

As stated in **Section 2.2.3**, this EA includes a discussion of the types of RPMP potential future activities that may have effects on the human and natural environment; however, the CTARNG would conduct future site-specific NEPA analysis once project details are known. Therefore, this section includes a broad discussion of environmental effects based on the types of RPMP potential future activities but does not discuss specific project effects in detail.

### 4.1 Location Description

#### 4.1.1 Significance Criteria

Significant adverse impacts would occur if either alternative caused the general landscape or aesthetic appearance of the CTC to become out of character with its existing appearance. *Less-than-significant* adverse impacts would occur if either alternative changed the landscape or appearance but not so much that it became out of character with its existing appearance.

#### 4.1.2 Impacts of the Proposed Action

The Proposed Action would result in no short-term impacts, *no adverse* impacts, and long-term *less-than-significant* beneficial effects on the general landscape and aesthetic appearance of the CTC. The RPMP would serve as a comprehensive framework for development, including Installation Planning Standards that would ensure that renovations and new construction would integrate well with the existing landscape, enhance the aesthetic appearance of the CTC, and conform with Army architectural and design standards. Therefore, long-term impacts would be beneficial and *less-than-significant*.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect the general landscape or aesthetic appearance of the CTC.

#### 4.1.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Ongoing mission activities that could affect the CTC's landscape and aesthetic appearance such as construction, renovation, and demolition of facilities would be conducted as they are currently. Potential future activities that could affect the CTC's landscape and aesthetic appearance would continue to be evaluated through project- and site-specific NEPA analysis and implemented in accordance with Army architectural and design standards. However, these activities would be carried out without an updated, long-range plan to direct development. There would be no short-term impacts or long-term *less-than-significant* adverse impacts on the CTC's landscape and aesthetic appearance.

#### 4.1.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. No BMPs would be necessary under either alternative to manage impacts.

### 4.2 Land Use

#### 4.2.1 Significance Criteria

Significant adverse impacts would occur if either alternative changed land use so it was inconsistent with current land use or planned land use as specified in an applicable land-use plan. *Less-than-significant* adverse impacts would occur if the alternative changed local land use, but the change was consistent with current land use and planned land use.

#### 4.2.2 Impacts of the Proposed Action

Implementing the Proposed Action would result in no short-term impacts, *no adverse* impacts, and long-term *less-than-significant* beneficial impacts on land use. The RPMP will serve as a comprehensive land-use plan to ensure effective and efficient land use to meet CTC mission requirements. The RPMP would ensure that future development at the CTC occurred in a logical manner, taking into account on- and off-post land uses and the CTC's vision and mission requirements. Guided by the RPMP, new facilities would be placed in the appropriate district (i.e., maintenance, storage, training, or transient), taking into consideration existing constraints on- and off-post and resulting in cohesive land uses. Beneficial land-use impacts would be realized from implementing standards and activities in the RPMP such as low impact development (LID) principles to enhance stormwater control and improved vehicular and pedestrian circulation.

The RPMP evaluates current and future mission requirements, CTC facilities, Training Center usage, adjacent property, the JLUS, and on-post constraints and developable areas over the short (5 years), mid (6–10 years), and long (20 years) term to create a comprehensive land-use plan. The RPMP would serve as a framework for development, ensuring that potential future construction of facilities, training activity, vehicular traffic and pedestrian circulation, and utilities would integrate well with land use now and in the future.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect CTC land use or create conflicts with off-post land use.

#### 4.2.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Ongoing mission activities that affect the CTC's land use such as siting and construction of new facilities would be conducted as they are currently; however, these activities would be carried out without an updated, long-range plan to direct development. Individual actions with a potential to affect CTC's land use or create a conflict with off-post land use would continue to be evaluated through project- and site-specific NEPA analysis; however, actions would be implemented individually, without comprehensive considerations for long-term mission requirements and logical land use. While the CTARNG would ensure that mission requirements would be met, planning might not be optimized

or conducted in a manner that would maximize the efficient and effective use of CTC land. There would be no short-term impacts and long-term *less-than-significant* adverse impacts on land use.

#### 4.2.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. No BMPs would be necessary under either alternative to manage impacts.

### 4.3 Air Quality

#### 4.3.1 Significance Criteria

Significant adverse impacts would occur if either alternative (1) produced emissions that exceeded the general conformity rule *de minimis* (of minimal importance) threshold values or (2) contributed to a violation of any Federal, State, or local air regulation. *Less-than-significant* adverse impacts would occur if either alternative resulted in emissions that are below *de minimis* thresholds.

#### 4.3.2 Impacts of the Proposed Action

Implementing the Proposed Action would result in short- and long-term *less-than-significant* adverse effects on air quality and climate change. Short-term *less-than-significant* adverse impacts would result from construction, demolition, and renovation activities. These activities would produce emissions of criteria pollutants, HAPs, and GHGs from fugitive dust, use of on- and off-road diesel construction equipment and vehicles, worker trips, architectural coatings (e.g., paint), and paving off-gasses. Construction activities that would disturb asbestos or lead-based paint would comply with applicable regulations for controlling emissions from these activities. Short-term emissions from the Proposed Action would be well below the general conformity rule *de minimis* thresholds and would not contribute to a violation of any Federal, State, or local air regulation.

Long-term *less-than-significant* adverse impacts would result from ongoing mission operations. Operations are projected to increase somewhat over time, and emissions of criteria pollutants, HAPs, and GHGs could increase slightly over time due to projected increases in the square footage requiring heating and cooling, the number of vehicle trips to the CTC, ground-disturbing training activities, and aircraft operations. Any new stationary sources of air emissions (e.g., generators or boilers) would be reviewed on a case-by-case basis to determine if they would be subject to Federal and State air permitting regulations, and any required permits would be obtained. Even with some increase, long-term emission levels from the Proposed Action would remain well below the general conformity rule *de minimis* thresholds and would not contribute to a violation of any Federal, State, or local air regulation.

As described in **Section 3.3**, the CTC is in a region that EPA has designated as a nonattainment area for ozone. Once specific project details are known, the CTARNG would calculate the total direct and indirect emissions for potential future construction and other activities. These emissions are not expected to exceed the general conformity rule *de minimis* thresholds and therefore are anticipated to qualify as exempt actions under 40 CFR § 93.153(c)(1). As part of the additional NEPA analysis of projects with the potential to adversely affect air quality, the CTARNG would prepare a Record of Non-Applicability to document that a General Conformity Determination is not required.

Connecticut's Abatement of Air Pollution regulation (Regulations of Connecticut State Agencies § 22a-174-1 *et seq.*) outlines requirements with which the CTARNG must comply when constructing, renovating, or demolishing facilities, such as controlling fugitive dust. In accordance with this regulation, reasonable precautions must be taken to prevent particulate matter from becoming airborne when constructing, repairing, or demolishing buildings, roads, and related facilities. Reasonable precautions might include using water to control dust from building construction, road grading, or land clearing; covering soil stockpiles; and covering trucks transporting soil. These precautions are not all-inclusive; the CTARNG and any contractors would comply with all applicable air pollution control regulations.

Although potential future construction and operation activities would produce some GHGs, the RPMP includes sustainability strategies that would help minimize those emissions. One example is to construct or renovate buildings to increase their energy efficiency through measures such as installing light-emitting diode (LED) light fixtures and controls that automatically turn off lights in rooms that are unoccupied. Another example is promoting compact, walkable development, which would reduce driving and the associated fossil fuel emissions.

Two of the goals enumerated in the RPMP are to "increase CTC resiliency" and "address building resiliency through site planning." Ways in which the CTC will increase resiliency at all three CTC sites include working with local utility providers to improve utility infrastructure and service, implementing sustainable planning strategies, implementing LID stormwater management concepts, and constructing resilient buildings. Implementing these measures to increase resiliency would help CTC buildings and infrastructure withstand the impacts of climate change such as rising sea levels, storm surges, more frequent severe weather events, more extreme temperatures, and changes in precipitation patterns (Mead & Hunt and Tetra Tech 2018).

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect air quality, including evaluating anticipated emissions relative to the Federal GHG Reporting Rule. If found to be applicable, the CTARNG would report their carbon dioxide emissions to the EPA.

### 4.3.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Construction, demolition, and ongoing mission activities would continue to emit criteria pollutants, HAPs, and GHGs in amounts similar to those being emitted under current conditions (see **Table 3**), so there would be short- and long-term *less-than-significant* adverse impacts on air quality. Individual actions with a potential to affect air quality would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations.

### 4.3.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. Under the Proposed Action, the CTARNG would implement the following BMPs, as applicable, during construction, renovation, and demolition projects to manage fugitive dust and air emissions:

- Apply water or soil stabilizers to or cover exposed soil to suppress dust during ground-disturbing activities and, if necessary, during dry-weather training activities.
- Limit or halt soil-disturbing activities during high-wind conditions.

- Reduce speed on unpaved surfaces. Limit driving on unpaved surfaces to necessary vehicles only.
- Cover soil stockpiles and trucks transporting soil or other materials that could cause airborne dust.
- Use electricity from established power sources rather than generators whenever possible.
- Repair and service equipment to prevent excess emissions.
- Minimize vehicle and equipment idling times (Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles commonly used on construction sites).
- Clean excess soil from heavy equipment and trucks leaving the work zone to prevent off-site transport.
- To the maximum extent practicable, use newer on-road vehicles and off-road construction equipment for construction projects, preferably those that meet EPA or California Air Resources Board emissions standards, and retrofit older diesel vehicles to reduce their emissions.

These measures would be communicated to the contractor and/or DoD staff person responsible for construction, renovation, and demolition activities.

## 4.4 Noise

### 4.4.1 Significance Criteria

Significant adverse impacts would occur if either alternative violated an applicable noise ordinance, introduced new noise sources that increased the ambient noise level 10 dBA or more, or harmed human health. *Less-than-significant* adverse impacts would occur if new noise sources were introduced or the ambient noise level increased, but not substantially or workers were exposed to noise but the effects of that exposure could be managed with BMPs.

### 4.4.2 Impacts of the Proposed Action

Implementing the Proposed Action would result in short- and long-term *less-than-significant* adverse impacts related to noise. Short-term *less-than-significant* adverse impacts would result from noise generated during construction, demolition, and renovation activities. **Table 13** presents typical noise levels (dBA at 50 feet) that EPA has estimated for the main phases of outdoor construction. Individual pieces of construction equipment typically generate noise levels of up to 90 dBA at a distance of 50 feet. With multiple items of equipment operating concurrently, noise levels can be relatively high at locations within several hundred feet of active construction sites. The zone of relatively high construction noise typically extends up to 800 feet from the site of major equipment operations. Because noise attenuates by approximately 6 dB with each doubling of distance from the noise source, locations farther than 800 feet from construction sites seldom experience noteworthy levels of construction noise (FTA 2006).

<b>Construction phase</b>	<b>Sound level (dBA at 50 feet)</b>
Ground clearing	84
Excavation, grading	89
Foundations	78
Structural	85
Finishing	89

Source: EPA 1971.

As described in Section 3.4, the residences located near all three CTC sites are the only noise-sensitive receptors near the installation. Noise from potential future construction, demolition, and renovation activities occurring less than 800 feet from the installation boundary would be audible at those residences. Noise from potential future construction, demolition, and renovation activities occurring more than 800 feet from the installation boundary would generally not be any louder at the residences than typical sounds such as traffic and the operation of landscaping equipment (e.g., lawn mowers). The CTC and construction contractors would comply with local noise ordinances by limiting hours of construction, where applicable. Effects would be *less than significant* because of the temporary nature of the potential future construction and because construction activities would comply with local noise ordinances.

Long-term *less-than-significant* adverse impacts on noise levels would occur from the introduction of new facilities and increases in training operations. Typical noise sources would include HVAC systems, training operations, emergency generators, and vehicle traffic. Even with the introduction of new facilities and increases in training operations, overall ambient noise levels would not be appreciably different than existing noise levels on- and off-post. Some noise from CTC training operations is currently audible off-post and implementing the Proposed Action would not be expected to appreciably change the extent, volume, or frequency of noise audible off-post. Therefore, long-term *less-than-significant* adverse impacts on noise levels would result.

Personnel exposed to noise levels exceeding OSHA limits from heavy equipment during construction would be required to wear appropriate hearing protection in accordance with OSHA regulations.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect noise levels.

#### **4.4.3 Impacts of the No Action Alternative**

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Noise associated with construction and demolition would result in short- and long-term *less-than-significant* adverse impacts. Short-term *less-than-significant* adverse impacts would result from construction, renovation, and demolition activities. Over the long term, the noise level would be expected to remain comparable to existing conditions, so long-term impacts would be *less than significant*. Individual actions with a potential to affect noise levels would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations.

#### 4.4.4 Mitigation Measures

No mitigation measures would be necessary to reduce adverse impacts to below significant levels. Under the Proposed Action, the CTARNG would manage noise impacts by implementing the following BMPs:

- Conduct construction activities during the times allowed by local noise ordinances, where applicable.
- Shut down noise-generating equipment when not in use.

### 4.5 Geology, Topography, and Soils

#### 4.5.1 Significance Criteria

Significant impacts would occur if either alternative affected unique geologic features, caused substantial changes in topography over a large area, or resulted in soil erosion that could not be managed with BMPs or reduced to below significant levels with mitigation measures. *Less-than-significant* impacts would occur if either alternative impacted only localized topography and if soil erosion impacts could be managed through BMPs.

#### 4.5.2 Impacts of the Proposed Action

Implementing the Proposed Action would have *no adverse* impacts on geology or topography. No RPMP potential future activity would adversely affect the underlying geology of a CTC site, so there would be no effects on geology. Potential future construction activities proposed in the RPMP would require minimal grading, so there would be no impacts on topography.

The Proposed Action would result in short-term *less-than-significant* adverse effects on soils due to ground-disturbing activities. No long-term impacts on soil would occur. Soil disturbance would occur in association with construction, renovation, or demolition projects, but adherence to the requirements of a State-issued construction stormwater permit, including use of State-approved BMPs to limit soil loss and erosion, would ensure that all impacts on soils would be *less than significant*. To minimize the impacts from land-disturbing activities on 1 or more acres, the CTARNG or contractor would be required to obtain a general permit from CTDEEP. A stormwater pollution prevention plan, including measures such as erosion and sediment controls and post-construction stormwater management, also would have to be prepared. The general permit requires that post-construction control measures incorporate runoff reduction practices such as LID techniques to meet its performance standards.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect geology, topography, or soils.

#### 4.5.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Existing geology and topography would remain unchanged, so there would be *no adverse* impacts on these resources. Ground-disturbing activities would result in short-term *less-than-significant* impacts on soils, but no long-term impacts would be anticipated. Individual actions with a potential to affect geology, topography, and soils would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations.

#### 4.5.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. Under the Proposed Action, the CTARNG would manage soil impacts by implementing the following BMPs:

- Prepare site-specific erosion and sedimentation control plans for all ground-disturbing activities.
- Install and monitor erosion-preventing BMPs for construction projects such as mulching bare soil, covering and/or seeding stockpiled soil, and planting and maintaining soil-stabilizing vegetation on denuded areas after temporary disturbances during construction and when construction is complete, using native species for final seeding to the maximum extent practicable.
- Install and monitor sediment control BMPs for construction projects such as silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, and rip-rap.

#### 4.6 Water Resources

##### 4.6.1 Significance Criteria

Significant impacts would occur if either alternative caused adverse effects on wetlands that could not be mitigated, adversely affected floodplain elevations, adversely affected the coastal zone, or caused adverse effects on surface water or groundwater quality that could not be mitigated. Adverse impacts on wetlands from either alternative would be *less than significant* if they could be mitigated, floodplain elevations and coastal zones remained unchanged, and surface water and groundwater quality did not decline.

##### 4.6.2 Impacts of the Proposed Action

Under the Proposed Action, there would be short- and long-term *less-than-significant* adverse impacts on water resources, including wetlands, floodplains, and the coastal zone.

Short-term *less-than-significant* adverse impacts on surface water resources could result from sediment-laden runoff associated with ground-disturbing activities such as new construction. The CTARNG would prepare an Erosion and Sedimentation Control Plan and Stormwater Management Plan for State approval and obtain coverage under the State's general permit for stormwater discharges from construction activities (applicable to construction activities that disturb 1 acre or more) to limit sedimentation in surface waters and spills of petroleum, oils, and lubricants that could seep into groundwater.

In accordance with requirements of the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015), a goal of 80-percent removal of total suspended solids from the stormwater discharge would be used in designing and installing post-construction stormwater management measures. In addition, post-construction control measures would incorporate runoff reduction practices such as LID techniques (e.g., porous paving and bioretention) to meet performance standards specified in the permit. Key strategies for effective LID would be implemented to the maximum extent practicable, including managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and



minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education.

Long-term *less-than-significant* adverse impacts on wetlands, floodplains, and coastal zones could occur. In compliance with EO 11990, the CTARNG would avoid working in wetlands to the maximum extent practicable. A State Inland Wetland and Watercourse permit from the CTDEEP's Land and Water Resources Division would be obtained for any work or construction activity within the inland wetland areas or watercourses on the CTC installations. Wetland assessment and permitting, in accordance with Clean Water Act Section 404 and Section 401 Water Quality Certification, would be obtained for potential future activities that cannot avoid impacts in wetlands.

CTARNG would submit flood management plans to CTDEEP for any potential future activities within or affecting a floodplain or that impact natural or man-made storm drainage facilities located on property that CTDEEP determines to be controlled by the state. The CTARNG would certify that potential future activities would be in compliance with flood and stormwater management standards specified in Section 25-68d of the CGS and Sections 25-68h-2 through 25-68h-3 of the Regulations of Connecticut State Agencies. Additionally, in accordance with Public Act 18-82, new structures or substantially improved structures designed for human habitation within the coastal boundary would be elevated, with the lowest floor two feet above base flood using the most current sea level rise scenario. The scenario is subject to change in not less than every 10 years. Projects planned in the 100-year flood zone would be designed to avoid adverse impacts to upstream, downstream, and adjacent properties from flooding. In addition, project designs would show no loss of flood storage.

Potential future activities would be implemented in accordance with Section 22a-94 of the CGS and the provisions of the CCMA. The CTARNG or contractor would submit to CTDEEP's Land and Water Resources Division a Coastal Consistency Request for Review prior to the design/build phase of a potential future activity to request concurrence.

See the CTDEEP and US Army Corps of Engineers letters in **Appendix A** for more information on State and Federal regulatory and permitting requirements for water resources as well as on stormwater management and LID practices.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect water resources.

#### **4.6.3 Impacts of the No Action Alternative**

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Individual actions with a potential to affect water resources would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations. Ground disturbance from construction and demolition and an increase in impervious surfaces over time would result in short- and long-term *less-than-significant* adverse impacts on water resources.

#### **4.6.4 Mitigation Measures**

No mitigation measures would be required under either alternative to reduce impacts to below significant levels. Under the Proposed Action, the CTC would manage water resources for unavoidable development impacts by obtaining required permits for wetland and water quality,

floodplain management, and stormwater management. Implementation of mitigation measures required as conditions of these permits would reduce any adverse impacts to below significant levels.

Under the Proposed Action, the CTARNG would manage water resource impacts by implementing the following BMPs:

- Design new construction to include permanent stormwater management controls and maximize on-site stormwater management and infiltration rates.
- Implement LID techniques such as porous paving, bioretention, vegetated roofs, and rainwater harvesting.
- Install and maintain construction BMPs for erosion prevention and sedimentation control (see **Section 4.5.4**).
- Avoid new construction in wetlands and floodplains to the maximum extent practicable.
- Comply with the requirements of Public Act 18-82 for applicable structures within flood management areas and the coastal boundary and accounting for the most recent sea level change scenario update.

## 4.7 Biological Resources

### 4.7.1 Significance Criteria

Significant impacts would occur if either alternative resulted in an unpermitted take of a species listed under the ESA, Connecticut ESA, MBTA, or BGEPA or adversely modified the species' designated critical habitat. *Less-than-significant* impacts would occur if either alternative resulted in a permitted take of a listed species or modification of its critical habitat or removed some native habitat that could lead to a localized decline in biological diversity or populations of common species. These impacts, however, could be managed through the implementation of BMPs.

### 4.7.2 Impacts of the Proposed Action

Implementing the Proposed Action would have short- and long-term *less-than-significant* adverse impacts on biological resources.

Short-term *less-than-significant* adverse impacts could result from construction, renovation, and demolition activities. Construction, renovation, and demolition activities could result in a take of a protected species, primarily by injuring or killing it or destroying its roost, den, or nest, which might contain eggs or young. Protected species include those protected by the ESA, Connecticut ESA, MBTA, and BGEPA. On the CTC installations, protected species of mammals, birds, reptiles, amphibians, and plants have been identified or have the potential to occur, as described in **Section 3.7**. Any ground disturbance, vegetation removal, or disturbance of waters or wetlands could potentially impact these species. In addition, because bats can roost in buildings, building renovation or demolition also has a potential to impact protected bat species. With the implementation of the BMPs listed in **Section 4.7.4**, however, none of the potential future activities would be likely to adversely affect protected species at the CTC.

The CTARNG provided a copy of the scoping letter found in **Appendix A** to the agencies that regulate biological resources: USFWS and CTDEEP. USFWS did not respond to the letter.

CTDEEP did respond; their response is provided in **Appendix A** and their input has been incorporated into this EA.

The CTARNG will consult with the USFWS and/or CTDEEP on potential future project-specific actions to determine potential effects on protected species. Should State or Federal permits be required for future site-specific projects, an application will be sent to CTDEEP's Wildlife Division for a detailed review of the State-listed species that could occur in the area. The applicant must submit a *Request for Natural Diversity Data Base State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to the Connecticut Natural Diversity Database for further review.

Long-term *less-than-significant* adverse impacts could result from increased human presence, noise, and lighting associated with operations at the CTC installations. Operations would not be expected to result in the unpermitted take of a protected species and would be comparable in intensity to the current level of operations and training at the CTC, so impacts would be *less than significant*.

Sensitive biological resources will be a factor in establishing project footprints and implementation times. Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect biological resources.

#### 4.7.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Individual actions with a potential to affect biological resources would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations. Habitat disturbance and human presence associated with construction and operation of individual projects would be comparable to current conditions and thus would result in short- and long-term *less-than-significant* impacts on biological resources.

#### 4.7.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. The CTARNG would, however, implement any mitigation measures identified through future project-specific consultation with the USFWS and/or State agencies to reduce impacts on biological resources to below significant levels.

Under the Proposed Action, the CTARNG would manage biological resource impacts by implementing the following BMPs:

- To avoid potential impacts on migratory bird species of concern, the protected northern long-eared bat, and other dwindling bat species, avoid tree clearing or cutting activities from 1 April through mid- to late-September. This will avoid the maternal roosting period of the northern long-eared bat and allow the first clutch of breeding migratory birds to fledge.
- To avoid potential impacts on migratory bird species of concern, delay brush or ground disturbance from 1 April 1 until after 15 July to minimize impacts on migratory birds.

The CTARNG would also comply with applicable laws, ordinances, and regulations, including the ESA, Connecticut ESA, MBTA, and BGEPA.

## 4.8 Cultural Resources

### 4.8.1 Significance Criteria

Significant cultural resource impacts would occur if either alternative (1) altered the integrity of a historic property listed in or eligible for listing in the NRHP so it is no longer eligible for listing, (2) physically impacted a unique archaeological resource listed in or eligible for listing in the NRHP, or (3) altered the integrity of a traditional cultural property listed in or eligible for listing in the NRHP. *Less-than-significant* impacts would occur if either alternative affected cultural resources not listed in or eligible for listing in the NRHP or if the impacts could be mitigated so the setting, character, or feeling of a historic property was not altered or a unique archaeological resource was not irreparably damaged.

### 4.8.2 Impacts of the Proposed Action

Implementing the Proposed Action would result in no short- or long-term *less-than-significant* adverse impacts on cultural resources. Activities described in the RPMP that would result in ground disturbance have the potential to affect archaeological resources. Although potential future construction is not proposed in areas of known archaeological sites or resources, previously unidentified archaeological resources could be found during ground disturbance. The ICRMP details processes that would be followed in the event that previously unidentified archaeological deposits, human remains, or funerary objects are encountered during ground-disturbing activities. Discoveries of human remains and associated funerary objects would be treated with respect and dignity, and the disposition of the remains and objects would be conducted in consultation with the Tribes and in accordance with the NAGPRA and its implementing regulations (43 CFR Part 10) or CGS Section 10-388, *Native American Cultures, Policy Concerning Archaeological Investigations, Human Burials*, as appropriate; and the SOP for inadvertent discovery in the ICRMP.

The potential for impacts to cultural resources would be reduced through continued implementation of the SOPs described in Chapter 3 of the ICRMP. The SOPs address maintenance and repair activities, disposal or demolition of excess property, military training actions, emergency actions, inadvertent discovery of cultural resources, and tribal consultation. These SOPs were prepared to assist CTARNG personnel who are not responsible for cultural resources management, but whose areas of responsibility could affect cultural resources. They are also provided to contractors and are included in relevant contracts.

The RPMP does not propose any actions that would disturb a known archaeological site or adversely impact an NRHP-eligible or potentially eligible structure or other resource. As described in **Section 3.8.1**, all buildings at Camp Niantic and EHRR and all buildings that are at least 50 years old or will be 50 years old by 2021 have been evaluated for eligibility for listing in the NRHP, and none have been found to be eligible. The SHPO has concurred with these findings. Once project details are known, the CTARNG would conduct additional NEPA analysis; conduct project-specific Section 106 consultation and compliance as needed, including implementing any mitigations measures identified through consultation; and continue to follow the SOPs in the ICRMP. With these measures in place, long-term *less-than-significant* impacts on cultural resources would be anticipated. No short-term impacts would be anticipated.

### 4.8.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Individual actions with a potential to affect cultural resources would continue to be evaluated through project- and site-specific NEPA analysis and executed in compliance with applicable regulations, particularly NHPA Section 106. The CTARNG and contractor would continue to follow SOPs and processes in the ICRMP. The potential for impacts to cultural resources would be expected to be similar to those under current conditions and thus there would be short- and long-term *less-than-significant* adverse impacts.

### 4.8.4 Mitigation Measures

No mitigation measures would be necessary to reduce adverse impacts to below significant levels. The CTARNG would, however, implement any project-specific mitigation measures determined in consultation with the Connecticut SHPO, Tribes, and other stakeholders during future NHPA Section 106 consultation and NEPA analysis to reduce any potential adverse effects to below significant levels. As a BMP, the CTARNG would implement all SOPs specified in the ICRMP to manage impacts on cultural resources.

## 4.9 Socioeconomics

### 4.9.1 Significance Criteria

Significant socioeconomic impacts would occur if either alternative resulted in substantial gains or losses (e.g., exceeding historical highs or lows) in local population or employment, or created a severe shortage or surplus of housing or public services. *Less-than-significant* impacts would occur if either alternative did not substantially change population, employment, demand for housing or public services, or quality of life of the affected community.

Significant impacts on the protection of children would occur if either alternative resulted in disproportionate environmental health or safety risks to children such as the risk to a child of exposure to an environmental hazard (through contact or ingestion) or the risk of substantial harm to the safety of children during construction or military training activities. *Less-than-significant* impacts would occur if these risks were not disproportionate to children or could be managed with BMPs or mitigation measures.

### 4.9.2 Impacts of the Proposed Action

Implementing the Proposed Action would result in *no adverse* impacts and short- and long-term *less-than-significant* beneficial effects on the local economy. The Proposed Action would have no impact on population or the demand for housing or public services, public health and safety, or the protection of children.

#### 4.9.2.1 Socioeconomics

Short- and long-term *less-than-significant* beneficial effects on the regional economy would be expected. In the short-term, the expenditures and employment associated with potential future demolition, construction, and renovation activities that could occur on the CTC installations would increase regional employment, income, and sales volume. These economic benefits could include purchasing project materials and supplies, hiring people in construction-related industries, wages earned by these employees, and expenditure of these wages on goods and services. Such

economic benefits would be short term because of the finite nature of construction projects. In the long term, a few additional permanent employees might be needed to operate and maintain the new and expanded facilities. The money directly spent in the short term during the construction phase and in the long term by operational employees would be cycled through the local economy through subsequent business spending and wages earned locally, creating indirect and induced economic benefits.

The number of additional jobs created would likely be small, and, therefore, the Proposed Action would not result in noticeable changes to population in the areas surrounding the CTC installations. The Proposed Action would not change demand for public housing. It would not change the need for public services such as fire, police protection, or medical services. Therefore, there would be no impacts on housing or public services.

#### **4.9.2.2 Public and Occupational Health and Safety**

No effects on public and occupational health and safety would be expected. Projects that could be implemented under the RPMP could include construction, demolition, and renovation activities. Construction jobsite safety and the prevention of accidents is an ongoing activity at any construction jobsite. Contractors would be required to establish and maintain site-specific health and safety programs that define workplace hazards, measures to prevent exposure and accidents, and plans to respond to foreseeable issues. All contractors doing construction activities at the CTC would be responsible for complying with DoD and OSHA health and safety regulations and would be required to conduct construction activities in a manner that does not pose any undue risk to workers.

Projects that could be implemented under the RPMP are not anticipated to pose an unacceptable or undue health or safety risk to CTC personnel or the public. Areas where potential future construction, demolition, or renovation activities could occur would be within the installation boundaries and would be secured to prevent unauthorized access. The CTARNG would continue to ensure public safety at its installations through established procedures that limit access to the CTC installations and to potentially hazardous areas on the installations to avoid public health or safety risks.

#### **4.9.2.3 Protection of Children**

No adverse impacts on the safety of children would be expected. Children are occasionally present at SRMR and Camp Niantic for special events such as Boy Scouts Camporees, JROTC leadership camps, and Teen Training Weekends or as visitors. The same precautions taken for general public health and safety discussed above would include the protection of children. The CTARNG would continue implementing its precautionary measures for child safety, including restricting access to construction sites and other unsafe areas and requiring adult supervision.

### **4.9.3 Impacts of the No Action Alternative**

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Ongoing operations and training would continue at the CTC installations under the No Action Alternative. There would be no short- or long-term impacts on the economy, public or occupational health and safety, or the safety of children. The CTARNG would continue to implement health and safety measures for the protection of workers, employees, the public, and children. Individual actions with the potential

to affect socioeconomic resources would continue to be evaluated through project- and site-specific NEPA analysis.

#### **4.9.4 Mitigation Measures**

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. Under the Proposed Action, the CTARNG would manage occupational health and safety and the protection of children by implementing the following BMPs:

- Ensure contractors have a safety program in place and implement all DoD and OSHA safety requirements for worker and public health and safety.
- Limit access to potentially hazardous areas such as construction, demolition, and renovation work areas.

#### **4.10 Environmental Justice**

##### **4.10.1 Significance Criteria**

Significant environmental justice impacts would occur if either alternative caused disproportionately high and adverse environmental, economic, social, or health effects on an identified minority or low-income population that appreciably exceed the level of those effects to the general population in the project area. *Less-than-significant* impacts would occur if either alternative resulted in impacts that would not be disproportionately high and adverse to minority or low-income communities in the project area.

##### **4.10.2 Impacts of the Proposed Action**

No environmental justice effects would be expected as a result of implementing the Proposed Action. Environmental justice communities of minority populations were identified in the affected areas around the CTC installations; however, the Proposed Action to approve a RPMP would not result in disproportionate adverse environmental, economic, social, or health effects on minority or low-income populations. Approval of the RPMP would not substantially affect human health or the environment by excluding anyone, denying anyone benefits, or subjecting anyone to discrimination or disproportionately high environmental health or safety risks.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect environmental justice.

##### **4.10.3 Impacts of the No Action Alternative**

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Ongoing operations and training would continue at the CTC installations under the No Action Alternative. There are no groups meeting the definition of an environmental justice community in the area and, therefore, there would be no short- or long-term impacts on environmental justice. Individual actions with the potential to affect environmental justice communities would continue to be evaluated through project- and site-specific NEPA analysis.

#### 4.10.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. No BMPs would be necessary under either alternative to manage impacts.

#### 4.11 Infrastructure

##### 4.11.1 Significance Criteria

Significant impacts would occur if either alternative increased demand on utilities or the transportation network so these systems were unable to keep up with the increased demand. *Less-than-significant* impacts would occur if either alternative added to demands on local utilities or the transportation network, but the systems had sufficient capacity to handle the increased demand, or the increased demand could be mitigated or managed with BMPs.

##### 4.11.2 Impacts of the Proposed Action

Under the Proposed Action, there would be short- and long-term *less-than-significant* adverse impacts and long-term beneficial impacts to infrastructure.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of project with the potential to adversely affect infrastructure.

###### 4.11.2.1 Buildings

The Proposed Action would likely result in future construction of new buildings and renovation and demolition of existing buildings. The CTARNG would follow the Installation Planning Standards and land-use planning guidelines in the RPMP to adapt the built environment at the CTC efficiently and effectively to continue to meet mission requirements. Short-term *less-than-significant* adverse impacts would result from disruptions associated with construction, renovation, and demolition. Long-term beneficial impacts would result from a built environment guided by the framework of the RPMP that better serves mission requirements.

###### 4.11.2.2 Utilities

While project-specific designs and anticipated utility demands of projects in the RPMP have not yet been prepared or calculated, increases in demand are expected. Future construction and renovation activities would require upgrading and modernizing existing utility systems and making new connections to utility providers. This could result in increased demand for service; however, that increase is expected to be well within the utility providers' capacities and utility infrastructure would be upgraded or expanded as needed to accommodate demand. Long-term beneficial impacts would result from upgrading and expanded utility infrastructure as needed to support the CTC.

Short-term *less-than-significant* adverse impacts would be expected from an increase in solid waste generation during planned construction, renovation, and demolition projects. Contractors would dispose of the increased amount of solid waste at permitted landfills. It is anticipated that landfills would have the available capacity to accommodate the additional waste. Recycling of waste from construction and demolition activities would be expected to divert some waste from landfills.



The RPMP proposes a new wastewater collection system that would connect to East Lyme's existing wastewater system. If State funding is used for the design or construction of the new wastewater collection system, CTDEEP's Municipal Wastewater Section would have to review and approve the design. If Federal funds are used, local authorities would have to approve the project. See the CTDEEP letter to the CTARNG in **Appendix A** for more information on these regulatory requirements.

#### **4.11.2.3 Transportation**

The Proposed Action would result in short- and long-term *less-than-significant* adverse impacts from increased vehicle traffic on area roads and through area intersections and long-term beneficial effects from improvements in transportation features at the CTC sites.

Demolition and construction activities would result in short-term *less-than-significant* adverse impacts on traffic. During construction, vehicle trips would increase because of trucks delivering equipment and supplies and workers traveling to and from the sites. Work on or adjacent to roads and intersections could require temporary alternate traffic patterns and result in temporary delays (e.g., if flaggers are used). These impacts would be limited to the area near the construction site.

Over the long term, roads within and adjacent to the CTC would experience additional traffic as a result of the addition of new facilities and an increase in personnel driving to and from the CTC. This amount of additional traffic would be expected to be small relative to the total amount of traffic currently on those roadways and would not appreciably increase traffic congestion.

The addition of primary and secondary access control points from US Highway 1 onto SRMR would result in a change in traffic patterns and might result in long-term adverse impacts to traffic along US Highway 1. At an appropriate time, the CTARNG would coordinate with the Connecticut Department of Transportation and the Town of East Lyme to conduct any needed studies to design the access control points to mitigate any potential adverse impacts on traffic on the highway such as by installing a traffic signal and turn lanes. Therefore, long-term adverse impacts would be *less than significant*.

The RPMP proposes several modifications to the transportation system at the CTC sites that would have long-term beneficial impacts, including paving roads at SRMR, and adding additional parking spaces and constructing a pedestrian walkway at Camp Niantic. More vehicle routes and better separation of vehicular and pedestrian traffic would help to minimize congestion and potential conflicts between user groups, enhancing overall transportation safety.

During scoping for this EA, CTDEEP recommended that 5 percent of parking spaces envisioned in the RPMP be equipped with Level 2 electric vehicle charging stations and that an additional 5 percent be made ready to accept charging stations. Although the RPMP does not address electric vehicle charging stations, the CTARNG has agreed to add a BMP to make an effort to fulfill this recommendation (see Section 4.11.4).

#### **4.11.3 Impacts of the No Action Alternative**

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Ongoing mission activities would continue to operate using existing infrastructure. Individual actions with a potential to affect the CTC's infrastructure would continue to be evaluated through project- and site-specific

NEPA analysis. Therefore, *less-than-significant* adverse impacts would be expected to occur on the CTC's infrastructure.

#### 4.11.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. At an appropriate time, however, the CTARNG would coordinate with the Connecticut Department of Transportation and the Town of East Lyme to conduct any needed studies to design the access control points to mitigate any potential adverse impacts on traffic on US Highway 1 such as by installing a traffic signal and turn lanes.

Under the Proposed Action, the CTARNG would implement the following BMP:

- To the extent practicable, equip 5 percent of new parking spaces with Level 2 electric vehicle charging stations and configure an additional 5 percent to be ready to accept charging stations.

#### 4.12 Hazardous and Toxic Materials and Waste

##### 4.12.1 Significance Criteria

Significant impacts would occur if either alternative substantially increased risks to human health or the environment (e.g., from spills or other exposure) through the improper management of hazardous and toxic materials and waste. *Less-than-significant* impacts would occur under either alternative if risks associated with hazardous and toxic materials and waste could be managed with appropriate BMPs and mitigation measures.

##### 4.12.2 Impacts of the Proposed Action

Implementing the Proposed Action would have short- and long-term *less-than-significant* adverse impacts on the management of hazardous and toxic materials and generation of hazardous waste.

Short-term *less-than-significant* impacts could occur during construction, renovation, and demolition activities. Hazardous and toxic materials would be used during these activities and waste would be generated. Use of these materials would entail some risk of spills or human exposure. These risks would be managed by complying with the CTC's Hazardous Material and Waste Management Plan (NGB 2016) and applicable Federal, State, and local regulations.

Potential future renovation or demolition of structures on any of the sites could expose materials that require special handling such as asbestos-containing materials, lead-based paint, and polychlorinated biphenyls (PCBs). Those structures would be surveyed for potentially hazardous building materials prior to disturbance or, in lieu of a survey, be treated as if those materials were present. CTARNG environmental personnel would be consulted during project planning to make sure potential future renovation or demolition would not disturb known subsurface contamination or interfere with remedies to address the contamination. Contractors would be responsible for handling all hazardous materials in accordance with applicable Federal, State, and local regulations and CTARNG policies. See the CTDEEP letter to the CTARNG in **Appendix A** for more information on regulatory requirements associated with the disposal of PCBs and solid waste.

Long-term *less-than-significant* adverse impacts would be realized from any increases in hazardous material use and waste generation from mission operations. Any increases would not

be expected to be substantial and risks to human health and the environment would be managed by complying with the CTC's Hazardous Material and Waste Management Plan (NGB 2016) and applicable Federal, State, and local regulations.

Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect management of hazardous and toxic materials and generation of hazardous waste.

#### 4.12.3 Impacts of the No Action Alternative

Under the No Action Alternative, the CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Short-term construction, renovation, and demolition projects and ongoing mission activities requiring the use of hazardous and toxic materials and generation of hazardous waste would be similar to current conditions. The associated risks to human health and the environment would be managed in compliance with the CTC's Hazardous Material and Waste Management Plan (NGB 2016) and applicable Federal, State, and local regulations. Individual actions that could affect hazardous and toxic materials and waste would continue to be evaluated through project- and site-specific NEPA analysis. Therefore, short- and long-term *less-than-significant* adverse impacts would occur.

#### 4.12.4 Mitigation Measures

No mitigation measures would be necessary under either alternative to reduce adverse impacts to below significant levels. No BMPs other than compliance with applicable laws, ordinances, and regulations; installation permits; and the CTARNG's Hazardous Material and Waste Management Plan would be necessary.

### 4.13 Summary of Mitigation Measures and BMPs

#### 4.13.1 Mitigation Measures

No mitigation measure would be necessary to reduce impacts to below significant levels. The CTARNG would, however, implement any mitigation measures identified through future project-specific NEPA analysis. For example, the CTARNG would conduct Coastal Consistency Determinations and consult with the SHPO and USFWS as necessary during project-specific NEPA analysis and would implement any mitigation measures required by those agencies or permits issued by them or other regulatory agencies. In addition, at an appropriate time, the CTARNG would coordinate with the Connecticut Department of Transportation and the Town of East Lyme to conduct any needed studies to design the access control points to mitigate any potential adverse impacts on traffic on US Highway 1.

#### 4.13.2 BMPs

**Table 14** summarizes applicable BMPs. No BMPs other than compliance with applicable laws, ordinances, regulations, and NGB and CTARNG policies, plans, and procedures are necessary to manage impact on land use, environmental justice, or hazardous and toxic materials and wastes.

Table 14. BMPs

Technical Resource Area	BMPs
Air Quality (Section 4.3.4)	<ul style="list-style-type: none"> <li>• Apply water or soil stabilizers to or cover exposed soil to suppress dust during ground-disturbing activities and, if necessary, during dry-weather training activities.</li> <li>• Limit or halt soil-disturbing activities during high wind conditions.</li> <li>• Reduce speed on unpaved surfaces. Limit driving on unpaved surfaces to necessary vehicles only.</li> <li>• Cover soil stockpiles and trucks transporting soil or other materials that could cause airborne dust.</li> <li>• Use electricity from established power sources rather than generators whenever possible.</li> <li>• Repair and service equipment to prevent excess emissions.</li> <li>• Minimize vehicle and equipment idling times (Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles commonly used on construction sites).</li> <li>• Clean excess soil from heavy equipment and trucks leaving the work zone to prevent off-site transport.</li> <li>• To the maximum extent practicable, use newer on-road vehicles and off-road construction equipment for construction projects, preferably those that meet EPA or California Air Resources Board emissions standards, and retrofit older diesel vehicles to reduce their emissions.</li> </ul>
Noise (Section 4.4.4)	<ul style="list-style-type: none"> <li>• Conduct construction activities during the times allowed by local noise ordinances, where applicable.</li> <li>• Shut down noise-generating equipment when not in use.</li> </ul>
Geology, Topography, and Soils (Section 4.5.4)	<ul style="list-style-type: none"> <li>• Prepare site-specific erosion and sedimentation control plans for all ground-disturbing activities.</li> <li>• Install and monitor erosion-preventing BMPs for construction projects such as mulching bare soil, covering and/or seeding stockpiled soil, and planting and maintaining soil-stabilizing vegetation on denuded areas after temporary disturbances during construction and when construction is complete, using native species for final seeding to the maximum extent practicable.</li> <li>• Install and monitor sedimentation control BMPs for construction projects such as silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, and rip-rap.</li> </ul>
Water Resources (Section 4.6.4)	<ul style="list-style-type: none"> <li>• Design new construction to include permanent stormwater management controls and maximize on-site stormwater management and infiltration rates.</li> <li>• Implement LID techniques such as porous paving, bioretention, vegetated roofs, and rainwater harvesting.</li> <li>• Install and maintain construction BMPs for erosion prevention and sediment control (see <b>Section 4.5.4</b>).</li> <li>• Avoid new construction in wetlands and floodplains to the maximum extent practicable.</li> </ul>

Table 14. BMPs

Technical Resource Area	BMPs
Biological Resources (Section 4.7.4)	<ul style="list-style-type: none"> <li>To avoid potential impacts on migratory bird species of concern, the protected northern long-eared bat, and other dwindling bat species, avoid tree clearing or cutting activities from 1 April through mid- to late-September. This will avoid the maternal roosting period of the northern long-eared bat and allow the first clutch of breeding migratory birds to fledge.</li> <li>To avoid potential impacts on migratory bird species of concern, delay brush or ground disturbance from 1 April until after 15 July to minimize impacts on migratory birds.</li> </ul>
Cultural Resources (Section 4.8.4)	<ul style="list-style-type: none"> <li>Implement all SOPs specified in the ICRMP</li> </ul>
Socioeconomics (Section 4.9.4)	<ul style="list-style-type: none"> <li>Ensure contractors have a safety program in place and implement all DoD and OSHA safety requirements for worker and public health and safety.</li> <li>Limit access to potentially hazardous areas such as construction, demolition, and renovation work areas.</li> </ul>
Infrastructure (Section 4.11.4)	<ul style="list-style-type: none"> <li>To the extent practicable, equip 5 percent of new parking spaces with Level 2 electric vehicle charging stations and configure an additional 5 percent to be ready to accept charging stations.</li> </ul>

#### 4.14 Cumulative Effects

As defined by CEQ Regulations in 40 CFR Part 1508.7, *cumulative effects* are effects that “result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions.” The cumulative effect analysis captures the effects that result from the Proposed Action in combination with the effects of other actions in the Proposed Action’s ROI.

The CTARNG conducted a review of past, present, and reasonably foreseeable actions in the vicinity of the CTC by reviewing the JLUS (MDG 2016), *Plans of Conservation and Development* for the towns of East Lyme (Town of East Lyme 2009) and East Haven (Town of East Haven 2019), and information found on the websites of the towns of Lyme (Town of Lyme 2019) and Old Lyme (Town of Old Lyme 2019). Notable projects or activities include the following:

- Extension of US Highway 1 south of SRMR and related roadway and transit enhancements to alleviate traffic congestion and provide alternate routes of travel.
- Implementation of measures identified in the JLUS, including additional security measures such as fences, patrols, and signage at the CTC’s borders and measures to increase community understanding and awareness of CTC activities.
- Continuing to pursue an Army Compatible Use Buffer Program at SRMR.
- Developing Memorandums of Agreement for use of off-post areas for training.
- Developing procedures to support off-post planning efforts such as planning for transportation and capital facilities projects to address military compatibility concerns during the planning process.

- Ongoing residential, commercial, and light industrial development and redevelopment limited by available land and zoning designations in the vicinity of the CTC.

#### 4.14.1 Cumulative Effects within the Area

Trends in the CTC areas include increasing population and a resulting increase in development of housing and commercial areas. Commercial development is also increasing as a result of tourism growing in southeastern Connecticut, particularly in coastal areas. Connecticut's population density is much higher than the US average, and, within the State, population density is especially high along the coast. Therefore, although population and development are increasing relatively slowly, these increases are occurring in an area that is already relatively densely populated. Nevertheless, the areas directly surrounding the CTC generally have a rural residential feel characterized by single-family homes on large lots. The off-post areas surrounding the CTC have not changed substantially in recent years nor are they projected to change substantially in the reasonably foreseeable future.

The juxtaposition of military training within the CTC and predominantly rural and residential land use off-post has been the baseline of the area for many years. The JLUS on which the CTARNG recently collaborated with the towns of East Lyme, Lyme, and Old Lyme identifies additional outreach efforts to enhance public awareness and understanding of planned military training activities and actions to improve security at the CTC sites (MDG 2016). No JLUS has been prepared for EHRR and the surrounding community of East Haven, although mitigating compatibility issues, preventing future issues, and continuing coordination with the surrounding community are CTARNG priorities there as well.

#### 4.14.2 Cumulative Effects of the Proposed Action

The Proposed Action would result in the impacts described in **Section 4.0**, including potential *less-than-significant* adverse impacts on air quality, noise, soils, water resources, biological resources, cultural resources, infrastructure, and hazardous and toxic materials and waste. Potential impacts would be mitigated and managed through implementing the mitigation measures and BMPs identified in **Section 4.13**. The Proposed Action would also result in *less-than-significant* beneficial impacts on land use, water resources, cultural resources, socioeconomics, and infrastructure. *No adverse* impacts on land use, geology, topography, socioeconomics, or environmental justice are anticipated from implementing the Proposed Action.

The cumulative effects of the Proposed Action are not expected to result in significant adverse impacts on any of the resource areas discussed in this EA (see also additional discussion in **Section 4.14.4**). Cumulative net beneficial effects on land use and infrastructure would be realized by approving the RPMP, which would provide a short- and long-term comprehensive plan for efficient land use and management of the projected future growth of training operations and their supporting infrastructure. Further, cumulative net beneficial effects on the local socioeconomic environment could be realized through the creation of temporary construction jobs associated with planned project activities.

#### 4.14.3 Cumulative Effects of the No Action Alternative

Under the No Action Alternative, the CTARNG would not approve the RPMP. The CTARNG would continue to carry out its mission at the CTC without a UFC 2-100-01-compliant RPMP to guide long-term development. Individual actions would continue to be evaluated through project- and site-specific NEPA analysis. There would be adverse and beneficial impacts on resources as

identified in the No Action Alternative impacts discussions in **Section 4.0**. When combined with other past, present, and reasonably foreseeable actions, any cumulative adverse or beneficial effects would be *less than significant*.

#### 4.14.4 Interrelationship of Cumulative Effects

The environment surrounding the CTC is slowly changing as a result of development and natural resource management activities. The CTARNG's Proposed Action, which is to approve the RPMP, would not result in significant impacts on the human or natural environment. Any adverse or beneficial impacts attributable to the Proposed Action or the No Action Alternative on the environment would be *less than significant*. Implementation of BMPs would manage cumulative impacts on the environment within and around the CTC. Coordination between the CTARNG and Federal, State, tribal, and local planning and regulatory authorities would minimize any potential future adverse impacts. This section discusses expected *less-than-significant* adverse cumulative effects of the Proposed Action, in combination with past, present, and reasonably foreseeable actions identified in **Section 4.14.1**.

**Air Quality:** Cumulatively, the increase in air emissions from construction activities and ongoing operations on- and off-post would not significantly impact regional air quality over the short or long term. Emission-producing activities at the CTC, when combined with emissions from areas surrounding the CTC, would result in short- and long-term *less-than-significant* emissions that are not expected to cumulatively adversely affect air quality.

**Noise:** Noise from CTC activities is periodically audible in some off-post locations under baseline conditions, and this situation would be expected to continue. Cumulatively, the noise environment on and near the CTC would remain relatively unchanged from existing conditions. Noise-producing activities on the CTC, when combined with noise from areas surrounding the CTC, would result in short- and long-term *less-than-significant* adverse impacts on the noise environment, which is not expected to be appreciably different than current conditions. Planned increases in community outreach and buffer zone development identified in the JLUS could result in cumulative beneficial effects.

**Soils and Water Resources:** Development on- and off-post would result in additional soil disturbance and increase the amount of impervious surface over time. At the CTC, the RPMP includes several measures to manage these impacts, including using LID stormwater drainage concepts and permeable pavers. Both on- and off-post, development would comply with applicable regulations regarding erosion, water quality protection, and stormwater management. Short-term and long-term cumulative adverse impacts on water resources from increased runoff are anticipated from the Proposed Action in combination with other past, present, and reasonably foreseeable actions. However, by complying with applicable regulations and permits and implementing BMPs as needed, cumulative adverse impacts would be *less than significant*.

**Biological Resources:** Development on- and off-post would result in additional pressure on biological resources in the area. If a potential for impacts to threatened and endangered species existed, mitigation measures would be identified through future project-specific consultation with USFWS and implemented to mitigate any adverse impacts. Short- and long-term adverse impacts on biological resources from loss of habitat and human disturbance are anticipated from implementing the Proposed Action in combination with other past, present, and reasonably foreseeable actions. With implementation of the BMPs identified in **Section 4.13** and through future project-specific consultation, cumulative adverse impacts would be *less than significant*.

**Cultural Resources:** The CTC and surrounding areas have a long and rich cultural history. Although development on- and off-post has the potential to adversely impact cultural resources, the CTARNG and surrounding towns take pride in the area's history and would be expected to take appropriate steps to identify and, where applicable, preserve important cultural resources. If there was a potential to impact cultural resources, mitigation measures would be identified through future project-specific consultation with the SHPO and Tribes and implemented to mitigate any adverse impacts. Cumulative adverse impacts from implementing the Proposed Action in combination with other past, present, and reasonably foreseeable actions would be *less than significant*.

**Infrastructure:** Over the long term, ongoing development on- and off-post would increase demand on utilities and the transportation network. The CTARNG and local towns are preparing to respond to increased demand by upgrading utility and transportation infrastructure. Although implementing these upgrades could cause short-term *less-than-significant* adverse impacts due to disruptions such as traffic delays in the vicinity of a construction site, long-term cumulative impacts on infrastructure would be beneficial as infrastructure is upgraded over time to provide better service and functionality.

**Hazardous and Toxic Materials and Waste:** The use, storage, handling, transport, and disposal of hazardous and toxic materials and waste would be expected to continue both on- and off-post at levels similar to current conditions. No potential future renovation or demolition activities identified on- or off-post would substantially increase risks to human health or the environment associated with the management of these materials. By complying with applicable regulations and management plans, cumulative adverse impacts would be *less than significant*.

**Conclusion:** Approval of the Proposed Action, in consideration of other past, present, and reasonably foreseeable actions, would result in *less-than-significant* cumulative adverse impacts on the resource areas evaluated in this EA. The Proposed Action would not make a noticeable adverse contribution to ongoing changes in physical and environmental conditions in the area and some beneficial impacts would be expected from better communication between the CTARNG and surrounding towns and through infrastructure improvements over time. Adverse impacts would be reduced and managed through implementation of mitigation measures and BMPs as described in **Section 4.13**. Additional mitigation measures might also be identified through future consultation and project-specific NEPA analysis.



## 5.0 Comparison of Alternatives and Conclusions

This section compares and contrasts the environmental impacts of the Proposed Action (the Preferred Action Alternative) and the No Action Alternative.

### 5.1 Comparison of the Environmental Consequences of the Alternatives

The CTARNG has evaluated the potential physical, environmental, cultural, and socioeconomic impacts of the Proposed Action, as described in **Section 2.2**, and the No Action Alternative. **Table 15** compares the environmental consequences of these alternatives.

Table 15. Impact Comparison Matrix		
Technical Resource Area	No Action Alternative	Proposed Action
Location Description (Sections 3.1 and 4.1)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts due to the lack of a comprehensive plan to direct growth that would preserve or enhance the landscape and aesthetic appearance of the CTC.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts due to enhancements to the landscape and aesthetic appearance of the CTC.
Land Use (Sections 3.2 and 4.2)	No short-term impacts. Long-term <i>less-than-significant</i> adverse impacts resulting from a lack of comprehensive planning for effective and efficient land use to meet mission requirements.	No short-term or adverse impacts. Long-term <i>less-than-significant</i> beneficial impacts resulting from comprehensive planning for effective and efficient land use to meet mission requirements.
Air Quality (Sections 3.3 and 4.3)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by emissions from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts from potential future activities caused by emissions from construction, demolition, and military training.
Noise (Sections 3.4 and 4.4)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from construction and operation of individual projects.	Short- and long-term <i>less-than-significant</i> adverse impacts caused by noise from potential future activities such as construction, demolition, and military training.
Geology, Topography, and Soils (Sections 3.5 and 4.5)	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with individual construction and demolition projects. No impacts on geology or topography. No long-term impacts.	Short-term <i>less-than-significant</i> adverse impacts on soils caused by ground disturbance associated with potential future activities such as construction, demolition, and military training. No impacts on geology or topography. No long-term impacts.

Table 15. Impact Comparison Matrix

Technical Resource Area	No Action Alternative	Proposed Action
Water Resources (Sections 3.6 and 4.6)	Short- and long-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance and an increase in impervious surfaces from new construction.	Short-term <i>less-than-significant</i> adverse impacts caused by runoff from ground disturbance. Long-term <i>less-than-significant</i> adverse impacts resulting from potential effects on wetlands, floodplains, and the coastal zone.
Biological Resources (Sections 3.7 and 4.7)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with construction and ongoing military operations.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from habitat disturbance and human presence associated with future activities such as construction, demolition, and military training.
Cultural Resources (Sections 3.8 and 4.8)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. Undertakings would continue to be evaluated through project-specific NEPA analysis and executed in compliance with the ICRMP.	Long-term <i>less-than-significant</i> adverse impacts resulting from undertakings with a potential to affect cultural resources. For future site-specific projects, the CTARNG would conduct NHPA Section 106 consultation and compliance, follow SOPs in the ICRMP, and implement any project-specific mitigation measures identified through consultation. No short-term impacts.
Socioeconomics (Sections 3.9 and 4.9)	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children.	<i>No adverse</i> impacts on socioeconomic indicators, public or occupational safety, or the protection of children. Short- and long-term <i>less-than-significant</i> beneficial effects on the local economy resulting from construction activities and increased operational staffing over time.
Environmental Justice (Sections 3.10 and 4.10)	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.	<i>No adverse</i> impacts on low-income or minority populations because of the lack of such communities within the ROI.
Infrastructure (Sections 3.11 and 4.11)	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand.	Short- and long-term <i>less-than-significant</i> adverse impacts resulting from construction, demolition, and renovation and increased usage and demand. Long-term beneficial impacts resulting from infrastructure improvements.
Hazardous and Toxic Materials and Waste (Sections 3.12 and 4.12)	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during activities such as construction, renovation, demolition, and ongoing mission operations.	Short- and long-term <i>less-than-significant</i> adverse impacts because of risks associated with using hazardous and toxic materials during potential future activities such as construction, renovation, demolition, and ongoing mission operations.

## 5.2 Conclusions

This EA examines the Proposed Action (the Preferred Action Alternative), which is approval of the CTC RPMP, and a No Action Alternative. The No Action Alternative is prescribed by CEQ Regulations to serve as the baseline against which the Proposed Action and alternatives are analyzed.

The analysis in the EA supports the conclusion that there would be *no significant adverse* impacts, either individually or cumulatively, on the human or natural environment as a result of implementing the Proposed Action, provided that the Proposed Action is implemented in compliance with all applicable laws, ordinances, and regulations. As described in **Section 4.13**, no mitigation measures would be necessary to reduce potential adverse impacts to below significant levels. BMPs specified in this EA would be implemented as applicable. Once specific project details are known, the CTARNG would conduct additional NEPA analysis of projects with the potential to adversely affect the human or natural environment.

Issuance of a FNSI is appropriate, and an EIS need not be prepared before implementing the Proposed Action.

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### **Tribes**

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Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
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**Appendix A**  
**Interagency and Intergovernmental Coordination of  
Environmental Planning**

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# Scoping Letter



**DEPARTMENTS OF THE ARMY AND THE AIR  
FORCE CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS. JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

21 September 2018

Robert Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford, CT 06105

Dear :

The Connecticut Army National Guard (CTARNG) is preparing an Environmental Assessment (EA) of a proposed action to approve a new Installation Master Plan (IMP) for the Connecticut Training Center (CTC) that is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for master plan development on DoD installations. The CTC is comprised of three noncontiguous installations: Stones Ranch Military Reservation in East Lyme, Lyme, and Old Lyme; Camp Niantic in the Village of Niantic in East Lyme; and East Haven Rifle Range in East Haven (Attachment 1).

Pursuant to the National Environmental Policy Act (NEPA) of 1969 (Title 42 *United States Code* sections 4321 *et seq.*); the Council on Environmental Quality's (CEQ's) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (Title 40 Code of Federal Regulations [CFR] parts 1500-1508); *Environmental Analysis of Army Actions* (32 CFR part 651); the Connecticut Environmental Policy Act (CEPA); and the 2011 *The Army National Guard NEPA Handbook*, the CTARNG will prepare an EA that considers the potential consequences of the proposed action on the human and natural environment.

The EA will examine the potential effects of the proposed action and will include analysis of a no action alternative, as required by CEQ regulations. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we are sending this letter to advise you of this effort and to request your assistance in identifying any potential issues related to the proposed action.

The CTARNG's proposed action is to approve the UFC 2-100-01 IMP. The UFC 2-100-01 IMP would inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CTC over the near-term (within 5 years) and long-term (20 years) planning horizon. The UFC 2-100-01 IMP represents a comprehensive approach to developing the CTC using planning strategies that reinforce capabilities to support the CTARNG's mission, promote quality of life, and enhance sustainability and environmental viability at the CTC. The UFC 2-100-01 IMP would replace CTC's current planning document,

which went in to effect in 2001 and no longer provides sufficient direction for future CTC projects. Under the no action alternative, the UFC 2-100-01 IMP would not be approved and the CTARNG would continue to manage the CTC under the 2001 planning document.

Attachment 2 provides the Interagency and Intergovernmental Coordination of Environmental Planning (IICEP) distribution list for agencies and organizations being contacted regarding this EA. If you consider any additional agencies should review and comment on this proposal, please feel free to include them in a re-distribution of this letter and the attached materials.

The CTARNG intends to maximize the use of electronic transmittals during subsequent coordination phases of this project. If you would prefer to receive paper copies of the draft and final EA documents, please indicate this in your response. If not, the draft and final EAs will be provided in an electronic format (e.g., a PDF file on a CD or posted to a website) when they become available for review. Please provide any comments you may have within 30 days of receipt of this letter.

If you have any questions concerning the proposed action, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CT-ARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

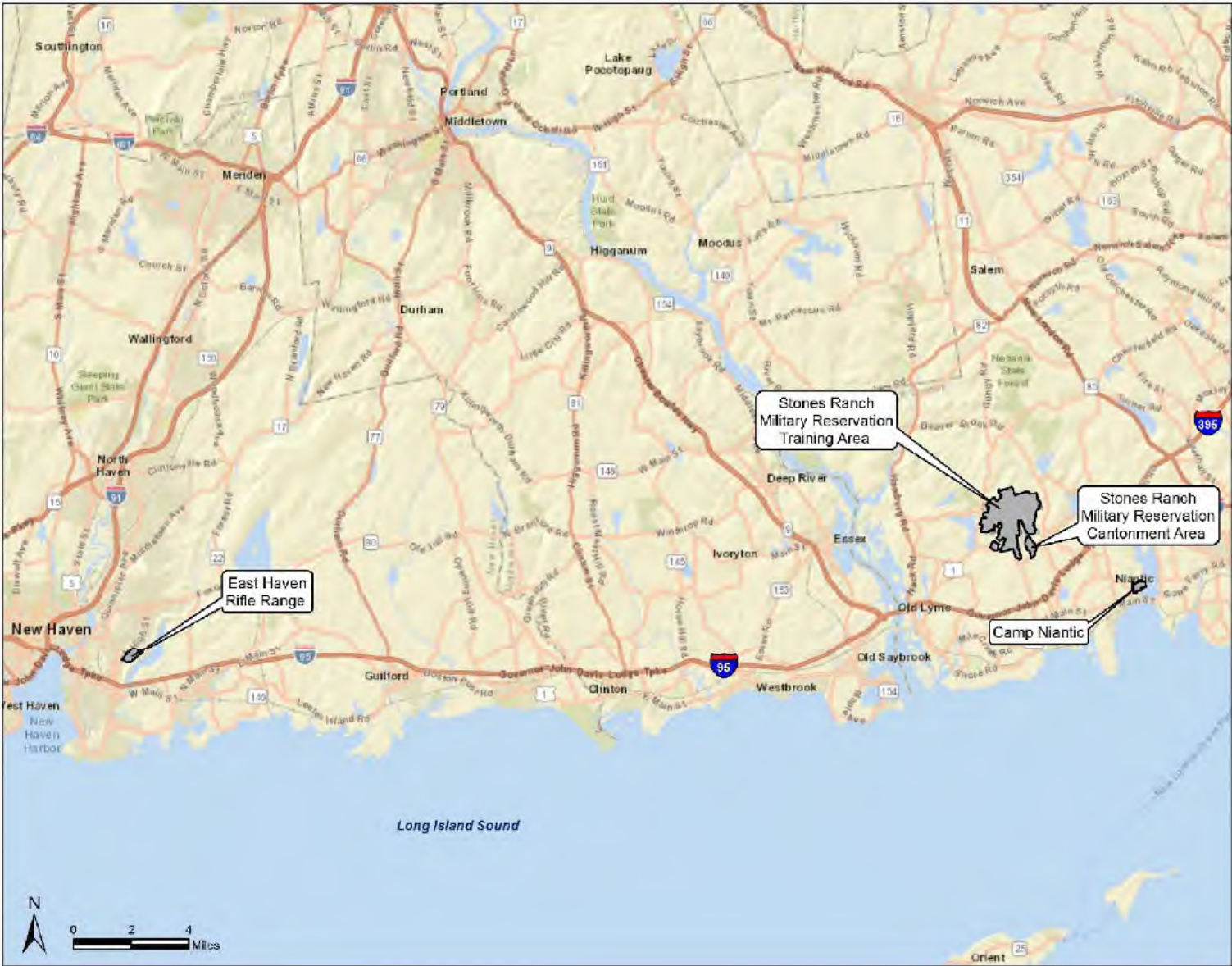
Sincerely,



Mr. Robert Dollak  
Environmental Program Manager  
CT-ARNG

- Attachments: 1. Map of CTC Locations  
2. IICEP Distribution List

### Attachment 1: Map of Connecticut Training Center Locations



## **Attachment 2. Distribution List**

### **Environmental Assessment for the Connecticut Training Center Installation Master Plan Connecticut Army National Guard**

#### **Federal Agencies**

Mr. Tom Chapman, Field Office Supervisor  
U.S. Fish and Wildlife Service  
New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301

U.S. Army Corps of Engineers  
New England District  
Regulatory/Permitting Main Office (CT, MA, NH, RI)  
Concord Park  
696 Virginia Road  
Concord, MA 01742

Ms. Alexandra Dunn, Regional Administrator  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109

#### **State Agencies**

Mr. Karl Wagener, Executive Director  
Connecticut Council on Environmental Quality  
79 Elm Street  
Hartford, CT 06106

Mr. David Kalafa, Undersecretary  
Connecticut Office of Policy and Management  
Division of Comprehensive Planning and Intergovernmental Policy  
450 Capitol Avenue  
Hartford, CT 06106

Mr. Todd Levine, Environmental Reviewer  
Connecticut Department of Economic & Community Development  
State Historic Preservation Office  
1 Constitution Plaza  
Hartford, CT 06103

Mr. Rob Klee, Commissioner  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Ms. Anne Gobin, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Air Management

79 Elm Street  
Hartford, CT 06106

Ms. Yvonne Bolton, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
79 Elm Street  
Hartford, CT 06106

Ms. Betsey Wingfield, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
79 Elm Street  
Hartford, CT 06106

Mr. Brian Thomson, Division Director  
Connecticut Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Land and Water Resources Division  
79 Elm Street  
Hartford, CT 06106

Mr. William Hyatt, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Natural Resources  
79 Elm Street  
Hartford, CT 06106

Mr. James Redeker, Commissioner  
Connecticut Department of Transportation  
2800 Berlin Turnpike  
Newington, CT 06111

Col. George Battle, Commanding Officer  
Connecticut Department of Emergency Services and Public Protection  
Division of State Police  
1111 Country Club Road  
Middletown, CT 06457

### **Municipal Agencies**

Ms. Rita Franco-Palazzo, Chairwoman  
Town of East Lyme  
Planning Commission  
108 Pennsylvania Ave.  
Niantic, CT 06357

Mr. Mike Finkelstein, Chief of Police  
Town of East Lyme  
Police Commission  
108 Pennsylvania Ave.  
Niantic, CT 06357

Mr. David Tiffany, Chairman  
Town of Lyme  
Planning and Zoning Commission  
480 Hamburg Road (Route 156)  
Lyme, CT 06371

Mr. Steve Mattson, First Selectman  
Town of Lyme  
The Board of Selectmen  
480 Hamburg Road (Route 156)  
Lyme, CT 06371

Ms. Kim Groves  
Town of Old Lyme  
Land Use/Planning Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

Trooper Kazimera Morse  
Town of Old Lyme  
Police Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

Mr. Christopher Soto, Planning and Zoning Enforcement Officer  
Town of East Haven  
Planning and Zoning Department  
250 Main Street  
East Haven, CT 06512

Mr. Ed Lennon, Chief  
East Haven Police Department  
471 North Hight Street  
East Haven, CT 06512

### **Tribes**

Mr. Kevin Brown, Chairman  
Mohegan Tribe of Indians of Connecticut  
13 Crow Hill Road  
Uncasville, CT 06382

Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matt's Path  
Mashantucket, CT 06338

**Response to Scoping Letter from Connecticut  
Department of Energy and Environmental  
Protection**





**To:** Robert Dollak, Environmental Program Manager  
Connecticut Army National Guard, 360 Broad Street, Hartford CT 06106

**From:** Linda Brunza- Environmental Analyst

**Telephone:** 860-424-3739

**Date:** 11/1/2018

**Email:** Linda.Brunza@ct.gov

**Subject:** Scoping Notice for the Environmental Assessment for the Connecticut Training Center Installation Master Plan for the Connecticut Military Department

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The Department of Energy and Environmental Protection (DEEP) received the Notice of Scoping for the Environmental Assessment being completed for the revised Installation Master Plan for Stones Ranch Military Reservation, East Haven Rifle Range and Camp Niantic. The information provided in the Master Plan proposes installation improvements such as road improvements, walkways and the construction of new buildings to meet training needs. Based on the information provided, DEEP commends the Connecticut Military Department for the avoidance of wetlands and sensitive areas and providing cluster development in the build out scenarios for each installation. The following comments are submitted for your consideration.

#### **Coastal Resources**

The proposed construction at Camp Niantic is within Connecticut's coastal boundary as defined by section 22a-94 of the Connecticut General Statutes (CGS) and is subject to the provisions of the Connecticut Coastal Management Act (CCMA). A Coastal Consistency Request for Review should be submitted prior to the Design/ Build phase to DEEP's Land and Water Resources Division to request concurrence. Information about the CCMA can be found on DEEP's website at [Overview of the Connecticut Coastal Management Program](#).

#### **Flood Management**

East Haven Rifle Range is located within the 100-year flood zone of the Farm River, as noted in the Master Plan as one of the constraints on development for this site. Proposed construction activities include the addition of a grounds maintenance building, upgraded parking, ammunition holding area, a simulator, perimeter fencing and upgrades to existing structures. The design of these structures must demonstrate that the project will not cause adverse impacts to upstream, downstream, or adjacent properties from flooding. This reach of the Farm River is prone to flooding; therefore, the proposal must also be designed to show no loss of flood storage. The proposed activities are located on property controlled by the state and within a mapped FEMA floodplain, therefore, the activities are considered to be state actions. The sponsoring agency must first certify that the project is in compliance with flood and stormwater management standards specified in section 25-68d of the CGS and section 25-68h-2 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA).

### **Inland Water Resources**

Any work or construction activity within the inland wetland areas or watercourses on the installations will require a State Inland Wetland and Watercourse permit from the Land and Water Resources Division (LWRD) pursuant to section 22a-36 of the CGS. Fact sheets regarding permit programs and permit application forms can be downloaded at: [LWRD Permits](#). If federal regulated wetlands are identified on site by a certified soil scientist, a permit may be required from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Further information is available on-line at [Army Corps of Engineers, New England District](#) or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. If a permit is required from the U.S. Army Corps of Engineers, a Water Quality Certificate will also be required from DEEP pursuant to section 401 of the Clean Water Act. For further information, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available on-line at [401 Certification](#).

### **Wastewater Treatment**

The Master Plan states that to support future development at Stones Ranch, a new wastewater collection system, wastewater lift station, and force main would be designed to connect to East Lyme's existing system, and the current septic system would be abandoned. If state funding is utilized for the design or construction of a new wastewater collection system, DEEP's Municipal Wastewater Section will need to review and approve the design. If federal funds are utilized the project will need approval from local authorities. More information can be found on DEEP's website at: [Review of Wastewater Infrastructure Plans and Specifications](#).

### **Stormwater Management**

Stormwater discharges from construction sites where one or more acres will be disturbed, regardless of project phasing, are subject to the requirements of the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015). For locally exempt projects disturbing one or more acres, a registration describing the site and the construction activity must be submitted to DEEP prior to the initiation of construction within timeframes specified in the general permit. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of eighty (80) percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as Low Impact Development (LID) techniques, to meet performance standards specified in the permit. For further information, contact the division at 860-424-3025. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#). DEEP notes that the Master Plan states LID techniques will be utilized where possible and commends the Connecticut Army National Guard in this effort.

### **Low Impact Development (LID)**

DEEP supports the use of LID practices such as water quality swales and rain gardens for facilitating infiltration of stormwater on site. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped together. DEEP recommends the utilization of one or a combination of the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs, roads and parking lots),
- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- the use of vegetated roofs (green roofs) to reduce the runoff from buildings,
- incorporation of proper physical barriers or operational procedures to prevent release of pollutants from special activity areas (e.g. loading docks, maintenance and service areas, dumpsters),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and
- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

### **Solid Waste**

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Clean fill is defined in section 22a-209-1 of the RCSA and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g. contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. For further information concerning disposal of demolition debris, contact the solid waste staff of the Waste Engineering & Enforcement Division at (860) 424-3366.

### **PCBs**

Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (e.g., paint, roofing, flooring, insulation, etc.). In recent years, the Environmental Protection Agency (EPA) has learned that caulk containing potentially harmful PCBs was used around windows, door frames, masonry columns and other masonry building materials in many buildings in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. Where buildings were constructed or renovated between 1950 and 1978, EPA recommends that PCB-containing caulk be removed during planned renovations and repairs (when replacing windows, doors, roofs, ventilation, etc.). EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to the air during replacement or repair of caulk in affected buildings. EPA recommends simple, commonsense work practices to prevent

the release of PCBs during these operations. Further information concerning the DEEP PCB Program can be found on-line at: [DEEP PCB Program](#). The EPA guidance can be found at: [PCBs in Caulk](#).

### **Threatened and Endangered Species (NDDB)**

Camp Niantic, East Haven Rifle Range and Stones Ranch are within the boundaries of the Natural Diversity Database, and listed species have been known to occur at these locations. Please be advised that should state or federal permits be required a formal application must be sent to the Wildlife Division prior to submitting permit applications for a detailed review of the species that may occur in this area. The applicant must submit a *Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to the NDDB for further review. Additional information concerning NDDB reviews and the request form may be found on-line at [NDDB Requests](#).

### **Electric Vehicle Readiness**

DEEP recommends that 10% of all parking spaces in the project design be made ready to accept Level 2 electric vehicle charging stations and that half of these parking spaces actually be equipped with Level 2 electric vehicle charging stations. Connecticut and seven other states are obligated, under the multi-state zero emission vehicle (ZEV) memorandum of understanding to collectively put 3.3 million ZEVs on our roadways by 2025. Connecticut's share of this target is approximately 150,000 ZEVs. Connecticut is further committed to reduce greenhouse gas emissions by 80% below 2001 levels by 2050 (and a mid-term target of 45% below 2001 levels by 2030), and must also reduce smog-forming motor vehicle pollution in order to meet the federal Clean Air Act's health based ozone standards. To meet these requirements, Connecticut must continue efforts to support the transition to transportation electrification by recommending the installation of electric vehicle (EV) charging infrastructure to support the growing EV market.

### **Idling**

Section 22a-174-18(b)(3)(C) of the RCSA limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to enable the sponsor to enforce idling restrictions at the project site without the involvement of DEEP.

### **Clean Vehicles**

DEEP typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or CARB standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the

2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. The use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

### **Fire Protection**

The Master Plan states that the 16-inch water main with 3,000 gallons per minute capacity on Boston Post Road in East Lyme can support a single fire event for office and maintenance buildings, such as those proposed on Stones Ranch. The EA should address the concerns from DEEP and EPA regarding manufactured foam chemicals, Aqueous Film Forming Foam (AFFF) and commit to not utilizing them at this facility for either fire training purposes or fire emergencies. DEEP is aware that the Department of Defense and Environmental Protection Agency are investigating how per- and polyfluoroalkyl substances (PFAS) have been used in firefighting foam. DEEP's primary concern is how these chemicals can directly impact surface water and groundwater and lead to the contamination of drinking well water. This potential pollution resulting from AFFF could adversely affect the health and safety of Connecticut's residents and the environment. DEEP acknowledges that new construction East Haven Rifle Range and Camp Niantic will be supported by water mains for fire emergencies and it is unlikely that firefighting foam is utilized at these facilities.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ OPPD

**Response to Scoping Letter from U.S. Army Corps of  
Engineers**



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
686 VIRGINIA ROAD  
CONCORD MA 01742-2751

October 9, 2018

Regulatory Division  
File No. NAE-2018-02369

Connecticut Army National Guard  
Attention: Mr. Robert Dollak  
360 Broad Street  
Hartford, Connecticut 06105

Dear Mr. Dollak:

We understand you intend to approve a new Installation Master Plan (IMP) for the Connecticut Training Center (CTC), which includes three noncontiguous installations in Connecticut: Stones Ranch Military Reservation, in East Lyme, Lyme, and Old Lyme; Camp Niantic in the Village of Niantic in East Lyme; and East Haven Rifle Range in East Haven. It appears that this project could involve activities that require a permit from the Corps of Engineers. The following is an explanation of Corps jurisdiction as defined by Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act.

A permit is required under Section 10 for all work seaward of mean high water in navigable waters of the United States. In New England, for purposes of Section 10, navigable waters of the United States are those subject to the ebb and flow of the tide and a few of the major waterways used to transport interstate or foreign commerce.

Permits are also required under Section 404 for discharges of dredged or fill material into all waters of the United States, including navigable waters, inland rivers, lakes, streams, and wetlands, as well as the excavation/grading within these waters/wetlands. On the coastline, our jurisdiction extends landward to the high tide line (i.e., the highest predictable tide) or to the landward limit of any wetlands, whichever is more extensive. In interior waters, our jurisdiction extends landward to the ordinary high water mark or to the landward limit of any wetlands, whichever is more extensive.

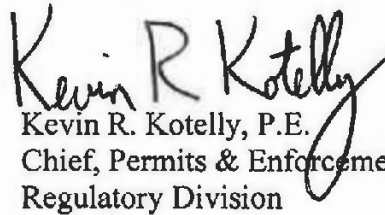
The term "wetlands" is defined by Federal regulations as "...those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions..." (Federal Register, November 13, 1986 33 CFR Part 328.3(b)). Wetlands generally include swamps, marshes, and bogs; however, forests and meadows that lack surface waters can also be wetlands. In addition, wetland delineations as determined for Federal, state, and local agencies might not be interchangeable.

Please reference your existing file number NAE-2018-02369 and submit an application on the enclosed ENG Form 4345 for work within Corps of Engineers jurisdiction. Project plans should be on 8.5" x 11" or 11" x 17" paper, drawn to scale (not reduced), and all pertinent features and labeling must be legible. Applications need to include sufficient information for us to verify our limits of jurisdiction. This will include wetland delineation data sheets for work in wetlands.

Please note that the authorizations referred to above must be obtained before any work or filling is done in areas subject to Corps jurisdiction. Performing such work or filling without first obtaining Corps authorization could result in substantial penalties.

If you have any questions, please contact me at your earliest convenience at (978) 318-8703.

Sincerely,

  
Kevin R. Kotelly, P.E.  
Chief, Permits & Enforcement Branch  
Regulatory Division

Enclosures

ENG 4345  
Regulatory Fact Sheet



The Public burden for this collection of information is estimated to average 10 hours per response, although the majority of applications should require 5 hours or less. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Defense, Washington Headquarters Service Directorate of Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302; and to the Office of Management and Budget, Paperwork Reduction Project (0710-0003), Washington, DC 20503. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. Please DO NOT RETURN your form to either of those addresses. Completed applications must be submitted to the District Engineer having jurisdiction over the location of the proposed activity.

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research and Sanctuaries Act, 33 USC 1413, Section 103. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued.

One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned.

(ITEMS 1 THRU 4 TO BE FILLED BY THE CORPS)

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED	4. DATE APPLICATION COMPLETED
--------------------	----------------------	------------------	-------------------------------

(ITEMS BELOW TO BE FILLED BY APPLICANT)

5. APPLICANT'S NAME	8. AUTHORIZED AGENT'S NAME AND TITLE <i>(an agent is not required)</i>
6. APPLICANT'S ADDRESS	9. AGENT'S ADDRESS
7. APPLICANT'S PHONE NOS. W/AREA CODE	10. AGENT'S PHONE NOS. W/AREA CODE
a. Residence	a. Residence
b. Business	b. Business

11. STATEMENT OF AUTHORIZATION

I hereby authorize, \_\_\_\_\_ to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

APPLICANT'S SIGNATURE

DATE

NAME, LOCATION AND DESCRIPTION OF PROJECT OR ACTIVITY

12. PROJECT NAME OR TITLE <i>(see instructions)</i>	
13. NAME OF WATERBODY, IF KNOWN <i>(if applicable)</i>	14. PROJECT STREET ADDRESS <i>(if applicable)</i>
15. LOCATION OF PROJECT	
_____ COUNTY	_____ STATE
16. OTHER LOCATION DESCRIPTIONS, IF KNOWN, <i>(see instructions)</i>	
17. DIRECTIONS TO THE SITE	

18. Nature of Activity (Description of project, include all features)

19. Project Purpose (Describe the reason or purpose of the project, see instructions)

USE BLOCKS 20-22 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

20. Reason(s) for Discharge

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards

22. Surface Area in Acres of Wetlands or Other Waters Filled (see instructions)

23. Is Any Portion of the Work Already Complete? Yes  No  IF YES, DESCRIBE THE COMPLETED WORK

24. Addresses of Adjoining Property Owners, Lessees, Etc., Whose Property Adjoins the Waterbody (If more than can be entered here, please attach a supplemental list).

25. List of Other Certifications or Approvals/Denials Received from other Federal, State or Local Agencies for Work Described in This Application.

AGENCY	TYPE APPROVAL*	IDENTIFICATION NUMBER	DATE APPLIED	DATE APPROVED	DATE DENIED

\*Would include but is not restricted to zoning, building and flood plain permits

26. Application is hereby made for a permit or permits to authorize the work described in this application. I certify that the information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.

\_\_\_\_\_  
SIGNATURE OF APPLICANT

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE OF AGENT

\_\_\_\_\_  
DATE

The application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filled out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

**Instructions for Preparing a  
Department of the Army Permit Application**

**Blocks 1 through 4.** To be completed by Corps of Engineers.

**Block 5. Applicant's Name.** Enter the name of the responsible party or parties. If the responsible party is an agency, company, corporation or other organization, indicate the responsible officer and title. If more than one party is associated with the application, please attach a sheet with the necessary information marked **Block 5**.

**Block 6. Address of Applicant.** Please provide the full address of the party or parties responsible for the application. If more space is needed, attach an extra sheet of paper marked **Block 6**.

**Block 7. Applicant Telephone Number(s).** Please provide the number where you can usually be reached during normal business hours.

**Blocks 8 through 11.** To be completed if you choose to have an agent.

**Block 8. Authorized Agent's Name and Title.** Indicate name of individual or agency, designated by you, to represent you in this process. An agent can be an attorney, builder, contractor, engineer or any other person or organization. Note: An agent is not required.

**Blocks 9 and 10. Agent's Address and Telephone Number.** Please provide the complete mailing address of the agent, along with the telephone number where he/she can be reached during normal business hours.

**Block 11. Statement of Authorization.** To be completed by applicant if an agent is to be employed.

**Block 12. Proposed Project Name or Title.** Please provide name identifying the proposed project (i.e., Landmark Plaza, Burned Hills Subdivision or Edsall Commercial Center).

**Block 13. Name of Waterbody.** Please provide the name of any stream, lake, marsh or other waterway to be directly impacted by the activity. If it is a minor (no name) stream, identify the waterbody the minor stream enters.

**Block 14. Proposed Project Street Address.** If the proposed project is located at a site having a street address (not a box number), please enter here.

**Block 15. Location of Proposed Project.** Enter the county and state where the proposed project is located. If more space is required, please attach a sheet with the necessary information marked **Block 15**.

**Block 16. Other Location Descriptions.** If available, provide the Section, Township and Range of the site and/or the latitude and longitude. You may also provide description of the proposed project location, such as lot numbers, tract numbers or you may choose to locate the proposed project site from a known point (such as the right descending bank of Smith Creek, one mile down from the Highway 14 bridge). If a large river or stream, include the river mile of the proposed project site if known.

**Block 17. Directions to the Site.** Provide directions to the site from a known location or landmark. Include highway and street numbers as well as names. Also provide distances from known locations and any other information that would assist in locating the site.

**Block 18. Nature of Activity.** Describe the overall activity or project. Give appropriate dimensions of structures such as wingwalls, dikes (identify the materials to be used in construction, as well as the methods by which the work is to be done), or excavations (length, width, and height). Indicate whether discharge of dredged or fill material is involved. Also, identify any structure to be constructed on a fill, piles or float supported platforms.

The written descriptions and illustrations are an important part of the application. Please describe, in detail, what you wish to do. If more space is needed, attach an extra sheet of paper marked **Block 18**.

**Block 19. Proposed Project Purpose.** Describe the purpose and need for the proposed project. What will it be used for and why? Also include a brief description of any related activities to be developed as the result of the proposed project. Give the approximate dates you plan to both begin and complete all work.

**Block 20. Reason(s) for Discharge.** If the activity involves the discharge of dredged and/or fill material into a wetland or other waterbody, including the temporary placement of material, explain the specific purpose of the placement of the material (such as erosion control).

**Block 21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards.** Describe the material to be discharged and amount of each material to be discharged within Corps jurisdiction. Please be sure this description will agree with your illustrations. Discharge material includes: rock, sand, clay, concrete, etc.

**Block 22. Surface Areas of Wetlands or Other Waters Filled.** Describe the area to be filled at each location. Specifically identify the surface areas, or part thereof, to be filled. Also include the means by which the discharge is to be done (backhoe, dragline, etc.). If dredged material is to be discharged on an upland site, identify the site and the steps to be taken (if necessary) to prevent runoff from the dredged material back into a waterbody. If more space is needed, attach an extra sheet of paper marked **Block 22**.

**Block 23. Is Any Portion of the Work Already Complete?** Provide any background on any part of the proposed project already completed. Describe the area already developed, structures completed, any dredged or fill material already discharged, the type of material, volume in cubic yards, acres filled, if a wetland or other waterbody (in acres or square feet). If the work was done under an existing Corps permit, identify the authorization if possible.

**Block 24. Names and Addresses of Adjoining Property Owners, Lessees, etc., Whose Property Adjoins the Project Site.** List complete names and full mailing addresses of the adjacent property owners (public and private) lessees, etc., whose property adjoins the waterbody or aquatic site where the work is being proposed so that they may be notified of the proposed activity (usually by public notice). If more space is needed, attach an extra sheet of paper marked Block 24.

**Information regarding adjacent landowners is usually available through the office of the tax assessor in the county of counties where the project is to be developed.**

**Block 25. Information about Approvals or Denials by Other Agencies.** You may need the approval of other Federal, state or local agencies for your project. Identify any applications you have submitted and the status, if any (approved or denied) of each application. You need not have obtained all other permits before applying for a Corps permit.

**Block 26. Signature of Applicant or Agent.** The application must be signed by the owner or other authorized party (agent). This signature shall be an affirmation that the party applying for the permit possesses the requisite property rights to undertake the activity applied for (including compliance with special conditions, mitigation, etc.).

#### DRAWINGS AND ILLUSTRATIONS

##### **General Information.**

Three types of illustrations are needed to properly depict the work to be undertaken. These illustrations or drawings are identified as a **Vicinity Map**, a **Plan View** or a **Typical Cross-Section Map**. Identify each illustration with a figure or attachment number.

Please submit one original, or good quality copy, of all drawings on 8 1/2x11 inch plain white paper (tracing paper or film may be substituted). Use the fewest number of sheets necessary for your drawings or illustrations.

Each illustration should identify the project, the applicant, and the type of illustration (vicinity map, plan view or cross-section). **While illustrations need not be professional (many small, private project illustrations are prepared by hand), they should be clear, accurate and contain all necessary information.**





# REGULATORY FACT SHEET

U.S. ARMY CORPS OF ENGINEERS

BUILDING STRONG.

Under **Section 10 of the Rivers and Harbors Act of 1899** (33 U.S.C. 403), a Corps permit is required for all work, including structures, seaward of the mean high water line in navigable waters of the U.S. In New England, for purposes of Section 10, navigable waters of the U.S. are those subject to the ebb and flow of the tide, as well as a few of the major rivers used to transport interstate or foreign commerce.

Under **Section 404 of the Clean Water Act (CWA)** (33 U.S.C. 1344), a Department of the Army (DA) permit from the U.S. Army Corps of Engineers is required for activities which involve the **discharge of dredged or fill material** into waters of the United States (U.S.), including not only navigable waters of the U.S. but also inland rivers, lakes, streams, and **wetlands**. In inland waters, Corps jurisdiction under the CWA extends landward to the **ordinary high water mark** or the **landward limit** of any wetlands, whichever is more extensive.

The term **"wetlands,"** as used above, is defined by Federal regulations as "... those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions..."(33 CFR 328.3(b), November 13, 1986 Federal Register). Wetlands generally include swamps, marshes, and bogs. Forested and meadow areas that lack standing water can also be wetlands. The Corps uses a three-parameter method to define the wetland/upland boundary. Please note that such boundaries might not be the same as wetland boundaries determined by state or local regulations, since those agencies sometimes use different criteria to delineate wetlands.

The term **"discharge"** is defined as the addition of dredged or fill material into waters of the U.S. This may include the redepositing of wetland soils such as occurs during mechanized land clearing activities, including grubbing, grading, and excavation.

The term **"fill material"** is defined by Federal regulation as "(1)...material placed in waters of the U.S. where the material has the effect of: (i) Replacing any portion of a water of the U.S. with dry land; or (ii) Changing the bottom elevation of any portion of a water of the U.S. (2) Examples of such fill material include, but are not limited to: rock, sand, soil, clay, plastics, construction debris, wood chips, overburden from mining or other excavation activities, and materials used to create any structure or infrastructure in the waters of the U.S. (3) The term fill material does not include trash or garbage." (33 CFR 323.2 (e), December 30, 2008 Federal Register). The EPA is responsible for regulating discharges of wastes and other pollutants.

You must obtain authorization for any work within Corps jurisdiction before you can legally undertake such work. Corps permits are a limited form of authorization containing a stated set of terms and conditions which must be complied with. Before starting any work in waters of the U.S., people doing such work or having such work done for them should: (1) be certain that a DA permit has been obtained or is not needed and (2) familiarize themselves and their contractor with the terms and conditions of the permit. Performing any work which requires, but is not authorized by, a Corps permit, or failing to comply with the terms and conditions of a Corps permit, may subject the developer, the landowner or other responsible party, including the contractor, to criminal and/or civil liability.

General Permits (GPs) have been issued for each New England state. The GPs are located at [www.nae.usace.army.mil/missions/regulatory](http://www.nae.usace.army.mil/missions/regulatory) >> State General Permits. Projects in Corps jurisdiction not authorized by a GP require an Individual Permit (IP). See the GPs for each state for more details. Violations of the CWA are punishable by civil and/or criminal fines and possible imprisonment. In addition, an order may be issued for (1) complete removal of the unauthorized work or fill and (2) restoration of the area to pre-construction conditions.

# **Scoping Correspondence with U.S. Environmental Protection Agency**

## Andrews, Emmy

---

**From:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>  
**Sent:** Friday, February 8, 2019 9:54 AM  
**To:** Andrews, Emmy  
**Subject:** FW: Connecticut Training Center Installation Master Plan (IMP)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

From: Timmermann, Timothy [mailto:Timmermann.Timothy@epa.gov]  
Sent: Friday, October 19, 2018 9:22 AM  
To: Dollak, Robert F NFG (US) <robert.f.dollak.nfg@mail.mil>  
Cc: Marsh, Michael <marsh.mike@epa.gov>; LeClair, Jacqueline <Leclair.Jackie@epa.gov>; Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Wintrob, Paul <Wintrob.Paul@epa.gov>  
Subject: [Non-DoD Source] Connecticut Training Center Installation Master Plan (IMP)

Rob:

Thank you for the invitation to offer scoping comments on the upcoming Environmental Assessment (EA) for the new Connecticut Training Center Installation Master Plan (IMP). Based on our review we note that the plan you forwarded mentions wetland avoidance, stormwater management using low impact development (LID) techniques and references energy efficiency for facility structures. We generally support these measures and their inclusion in the forthcoming EA. We would appreciate the opportunity to review the EA when it is available.

Please contact me directly with any questions.

Timothy L. Timmermann, Director  
Office of Environmental Review  
EPA New England-Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP 06-3  
Boston, MA 02109-3912

Email: [timmermann.timothy@epa.gov](mailto:timmermann.timothy@epa.gov)  
Telephone: 617-918-1025  
E-Fax: 617-918-0025

## Andrews, Emmy

---

**From:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>  
**Sent:** Friday, February 8, 2019 9:56 AM  
**To:** Andrews, Emmy  
**Subject:** FW: [Non-DoD Source] Installation Master Plan (IMP) for the Connecticut Training Center

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

From: Timmermann, Timothy [mailto:Timmermann.Timothy@epa.gov]  
Sent: Thursday, October 11, 2018 8:42 AM  
To: Dollak, Robert F NFG (US) <robert.f.dollak.nfg@mail.mil>  
Subject: RE: [Non-DoD Source] Installation Master Plan (IMP) for the Connecticut Training Center

It did

Thanks for that. Interesting reading.

I'll be in touch

Timothy L. Timmermann, Director  
Office of Environmental Review  
EPA New England-Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP 06-3  
Boston, MA 02109-3912

Email: timmermann.timothy@epa.gov  
Telephone: 617-918-1025  
E-Fax: 617-918-0025

-----Original Message-----

From: Dollak, Robert F NFG (US) [mailto:robert.f.dollak.nfg@mail.mil]  
Sent: Thursday, October 11, 2018 8:25 AM  
To: Timmermann, Timothy <Timmermann.Timothy@epa.gov>  
Subject: RE: [Non-DoD Source] Installation Master Plan (IMP) for the Connecticut Training Center

Good Morning Tim,

Just checking to make sure the file I sent you yesterday went through.

RD

-----Original Message-----

From: Timmermann, Timothy [mailto:Timmermann.Timothy@epa.gov]



Sent: Wednesday, October 10, 2018 10:48 AM  
To: Dollak, Robert F NFG (US) <robert.f.dollak.nfg@mail.mil>  
Cc: Timmermann, Timothy <Timmermann.Timothy@epa.gov>  
Subject: [Non-DoD Source] Installation Master Plan (IMP) for the Connecticut Training Center

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

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Bob:

Thanks for the time on the phone today. I look forward to taking a look at the Master Plan document.

Timothy L. Timmermann, Director

Office of Environmental Review

EPA New England-Region 1

5 Post Office Square, Suite 100

Mail Code OEP 06-3

Boston, MA 02109-3912

Email: [timmermann.timothy@epa.gov](mailto:timmermann.timothy@epa.gov) < Caution-mailto:timmermann.timothy@epa.gov >

Telephone: 617-918-1025

E-Fax: 617-918-0025

**Letter Announcing Availability of  
Final EA and Draft FNSI**



**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Tracy Babbidge, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Air Management  
79 Elm Street  
Hartford, CT 06106

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
Approval of the Connecticut Training Center Real Property Master Plan,  
Connecticut Army National Guard

The Connecticut Military Department/Connecticut Army National Guard (CTARNG) proposes to approve a new Real Property Master Plan (RPMP) for the Connecticut Training Center (CTC) consistent with the requirements of the US Department of Defense (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for developing RPMPs for DoD installations.

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You are invited to review the Final EA and Draft Finding of No Significant Impact (FNSI) and submit your comments. A CD containing the Final EA and Draft FNSI is provided with this letter. The 45-day public comment period is from 2 June 2019 through 19 July 2019.

If you have any questions, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CTARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

Sincerely

*Rob Dollak*

Mr. Rob Dollak  
Environmental Program Manager  
CTARNG

Attachment:

1. Final EA and Draft FNSI for Approval of the Connecticut Training Center Real Property Master Plan (on CD)



**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Ms. Yvonne Bolton, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
79 Elm Street  
Hartford, CT 06106

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Mr. Ross C. Byrne, Chairman  
Town of Lyme  
Planning and Zoning Commission  
480 Hamburg Road (Route 156)  
Lyme, CT 06371

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
Approval of the Connecticut Training Center Real Property Master Plan,  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Ms. Katie Dykes, Commissioner  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Mike Finkelstein, Chief of Police  
Town of East Lyme  
Police Commission  
108 Pennsylvania Ave.  
Niantic, CT 06357

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
Approval of the Connecticut Training Center Real Property Master Plan,  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Joseph Giulietti, Commissioner  
Connecticut Department of Transportation  
2800 Berlin Turnpike  
Newington, CT 06111

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Ms. Kim Groves  
Town of Old Lyme  
Land Use/Planning Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
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GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Jonathan Harris, Undersecretary  
Connecticut Office of Policy and Management  
Division of Comprehensive Planning and Intergovernmental Policy  
450 Capitol Avenue  
Hartford, CT 06106

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
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Sincerely

*Rob Dollak*

Mr. Rob Dollak  
Environmental Program Manager  
CTARNG

Attachment:

1. Final EA and Draft FNSI for Approval of the Connecticut Training Center Real Property Master Plan (on CD)



**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Mr. Peter B. Hearn, Executive Director  
Connecticut Council on Environmental Quality  
79 Elm Street  
Hartford, CT 06106

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Rick Jacobson, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Natural Resources  
79 Elm Street  
Hartford, CT 06106

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

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360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Mr. Ed Lennon, Chief  
East Haven Police Department  
471 North High Street  
East Haven, CT 06512

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
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COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Todd Levine, Environmental Reviewer  
Connecticut Department of Economic & Community Development  
State Historic Preservation Office  
1 Constitution Plaza  
Hartford, CT 06103

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
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360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Mr. Steve Mattson, First Selectman  
Town of Lyme  
The Board of Selectmen  
480 Hamburg Road (Route 156)  
Lyme, CT 06371

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
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HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

**MEMORANDUM FOR:** Col. Stavros Mellekas, Commanding Officer  
Connecticut Department of Emergency Services and Public Protection  
Division of State Police  
1111 Country Club Road  
Middletown, CT 06457

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

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29 May 2019

MEMORANDUM FOR: Trooper Kazimera Morse  
Town of Old Lyme  
Police Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

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HARTFORD, CONNECTICUT 06105-3795**

29 May 2019

MEMORANDUM FOR: Mr. Kirk Scott, Chair  
Town of East Lyme  
Planning Commission  
108 Pennsylvania Ave.  
Niantic, CT 06357

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

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29 May 2019

MEMORANDUM FOR: Mr. Christopher Soto  
Planning and Zoning Enforcement Officer  
Town of East Haven  
Planning and Zoning Department  
250 Main Street  
East Haven, CT 06512

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
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29 May 2019

**MEMORANDUM FOR:** Mr. Brian Thomson, Division Director  
Connecticut Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Land and Water Resources Division  
79 Elm Street  
Hartford, CT 06106

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
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29 May 2019

**MEMORANDUM FOR:** Mr. Robert DeSista, Acting Chief, Regulatory Division  
U.S. Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
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**Letter from Connecticut Department of Energy and  
Environmental Protection Regarding  
Final EA and Draft FNSI**



**To:** Mr. Robert Dollak, Environmental Program Manager, Connecticut Military Department  
360 Broad Street, Hartford CT 06106

**From:** Linda Brunza- Environmental Analyst

**Telephone:** 860-424-3739

**Date:** 7/19/2019

**Email:** [Linda.Brunza@ct.gov](mailto:Linda.Brunza@ct.gov)

**Subject:** Scoping Notice for the Environmental Assessment for the Connecticut Training Center Real Property Master Plan (RPMP) for the Connecticut Army National Guard (CTARNG).

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the Environmental Assessment (EA) for a new Real Property Master Plan (RPMP) for the Connecticut Training Center. The EA was produced following the original scoping notice on October 16, 2018, with a response from DEEP dated November 1, 2018. The Real Property Master Plan addresses long term planning over the next 20 years for three installations: Stones Ranch Military Reservation at 10 Stone Ranch Road in East Lyme, Camp Niantic (aka Camp Nett) located at 38 Smith Street in Niantic, and East Haven Rifle Range located at 591 North High Street in East Haven. The EA is intended to be an assessment of the approval of the Master Plan, as opposed to the no build alternative.

In the short term, the goals of the RPMP would be to renovate or modernize facilities such as barracks, dining facilities, fitness center, and classrooms. Construction would be proposed to renovate or expand maintenance areas, classrooms and parking lots, along with upgrading utility structures and stormwater, wastewater and electrical infrastructure. Long-term projects are to build facilities to increase training relevance such as a Medical Detachment Readiness Center, instruction facilities, relocate existing structures, realign and pave roadways, and connect to town infrastructure for wastewater.

DEEP recommends incorporating a new state law, Public Act 18-82, signed by Governor Malloy in June 2018 regarding climate change policy and resiliency in the areas of coastal and inland flood management. DEEP held a public hearing in October 2018 concerning the sea level rise scenario. This is new information that will need to be considered for East Haven Rifle Range, Camp Niantic, and a small portion near the Four Mile River on Stones Ranch Military Reservation.

### **Coastal Resources**

The EA states that a Coastal Consistency Review will be conducted during future project-specific NEPA analysis and any mitigation measures would be implemented. The EA identifies constraints for development at Camp Niantic and East Haven Rifle Range due to the 100-year and 500-year floodplains, but does not address how construction will be managed or modified to meet the constraints. The EA should address Public Act 18-82, [An Act Concerning Climate Change Planning and Resiliency](#). The bill integrates sea level change projections determined by the

University of Connecticut's Marine Sciences Division as an update of existing federal projections into planning documents, subject to change in not less than every 10 years. The projections are applied to the state's coastal management and flood management laws. The bill expands the definition of "coastal hazard areas" and "coastal boundary." Coastal hazard areas will now include areas that are subject to inundation as determined by the most recent sea level rise scenario. The bill requires property in the coastal boundary to include at least two additional feet of freeboard above base flood level and any additional freeboard to account for the most recent seal level change scenario update. Freeboard is a safety factor, expressed in feet above a calculated flood level, to compensate for unknown factors that can contribute to flood height such as wave action or debris. Property in the coastal boundary must also be flood proofed with any combination of structural or non-structural adjustments that reduce or eliminate flood damage to real property, water and sanitary facilities, and to the structures. Based on the current sea level rise projection of two feet by 2050, The CTARNG should take into consideration risks associated with increased coastal flooding and erosion, make recommendations on future infrastructure and property development to minimize the use of areas prone to flooding, and identify the impacts of flooding on infrastructure and natural resources.

For example, the EA should discuss building requirements for construction in a floodplain with the proposed sea level scenario. New structures or substantially improved structures designed for human habitation must be elevated with the lowest floor two feet above base flood using the current scenario, subject to change in the next ten years.

### **Flood Management**

The EA recognizes the need to obtain Flood Management Certification in accordance with section 25-68b of the CGS. The EA recognizes that portions of the project area at East Haven Rifle Range and Camp Niantic are within the 100 and 500-year floodplain. The EA states that if there is a potential for disturbance in the floodplain, it will be addressed in the application for Flood Management Certification. The EA does not discuss building restrictions for construction within a floodplain. On page 57, the EA states that potential future activities on state owned property within a mapped floodplain would be considered state actions. In addition, the EA must recognize that the activity does not have to be within a mapped floodplain to be considered a state action. Connecticut General Statute's 25-68b through section 25-68h requires any state agency proposing an activity within or affecting a floodplain or that impacts natural or man-made storm drainage facilities located on property the commissioner determines to be controlled by the state, to submit flood management to DEEP.

### **Stormwater**

Stormwater treatment is of primary concern in the build out of these installations, due to the lack of current retention and treatment at the sites. The EA should address how new construction will provide pre-treatment for stormwater at all three installations. Pre-treatment during construction and post-construction will be reviewed during permitting for the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities*. The general permit requires that post-construction control measures incorporate runoff reduction practices, such as low impact development techniques, to meet performance standards. A goal of 80 percent removal of total suspended solids from stormwater discharge shall be used in designing and installing post-construction management measures. The EA should discuss this general permit and how the installations will improve stormwater discharge in the 20 year build out scenario.

Thank you for the opportunity to review the Environmental Assessment for the Real Property Master Plan. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ OPPD

**Appendix B**  
**Native American Consultation**

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24 July 2019

MEMORANDUM FOR RECORD

SUBJECT: Tribal Consultation for the Approval of the Connecticut Training Center (CTC) Real Property Master Plan (RPMP)

1. On 21 September 2018, the Connecticut Army National Guard (CTARNG) initiated Tribal consultation with two Federally recognized Tribes recorded as having cultural affiliation with and interest in the southeastern Connecticut region. The CTARNG sent each of the Tribes a letter via certified mail that contained information about the Proposed Action, which is to approve the RPMP for the CTC, and invited the Tribes to provide any comments they had on it within 30 days of receipt of the letter. A copy of the letter is provided in this appendix.
2. The Tribes the CTARNG contacted were the following; contact information for the Tribes is provided in Appendix A.:
  - Mashantucket Pequot Tribal Nation
  - Mohegan Tribal Nation
3. The CTARNG received a response from the Mohegan Tribal Nation on 19 October 2018 requesting more information on the Proposed Action. On 20 October 2018, the CTARNG responded that they would send the Tribe a copy of the RPMP and subsequently emailed a copy to the Tribe. Both of these communications are provided in this appendix.
4. The CTARNG followed up with the Mashantucket Pequot Tribal Nation by email on 22 March 2019. The CTARNG received a response from the Tribe the same day copying the Tribal Historic Preservation Office. On 1 April 2019, the CTARNG responded that they would be sure to forward information pertaining to this project to the Tribe and send the Tribe a copy of the RPMP and subsequently emailed a copy to the Tribe. These communications are provided in this appendix.
5. On 28 May 2019, when the Final Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI) were released for public review, CTARNG sent a second letter to the tribes via certified return mail. Both Tribes were sent a hard copy of the Final EA and Draft FNSI and invited to provide any comments they had within 45 days of receipt of the letter. The letters and mail receipts are provided in this appendix. No comments or responses were received from the tribes
6. The CTARNG will continue Tribal consultation by sending a third letter to the Tribes via certified return mail and email once the FNSI is signed. Both Tribes will be provided with a copy of the Final EA and signed FNSI and asked to provide any comments they have within 30 days of receipt of the letter. The CTARNG will respond to any further communications received from the Tribes.
7. The undersigned is the point of contact for this action and can be reached at 860-524-4945 or [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil).

ROB DOLLAH  
Environmental Program Manager, CTARNG

Enclosures

Letter to Tribal contacts dated 21 September 2018 and mail receipts

Correspondence between CTARNG and Mohegan Tribal Nation dated 19 and 20 October 2018

Correspondence between CTARNG and Mashantucket Pequot Tribal Nation dated 22 March and 1 April 2019

Letter to Tribal contacts dated 28 May 2019 and mail receipts



**Letter to Tribal contacts dated 21 September 2018  
and Mail Receipts**



**DEPARTMENTS OF THE ARMY AND THE AIR  
FORCE CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS. JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

TO: Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matt's Path  
Mashantucket, CT 06338

21 September 2018

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford, CT 06105

**COPY**

Dear :

The Connecticut Army National Guard (CTARNG) is preparing an Environmental Assessment (EA) of a proposed action to approve a new Installation Master Plan (IMP) for the Connecticut Training Center (CTC) that is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for master plan development on DoD installations. The CTC is comprised of three noncontiguous installations: Stones Ranch Military Reservation in East Lyme, Lyme, and Old Lyme; Camp Niantic in the Village of Niantic in East Lyme; and East Haven Rifle Range in East Haven (Attachment 1).

Pursuant to the National Environmental Policy Act (NEPA) of 1969 (Title 42 *United States Code* sections 4321 *et seq.*); the Council on Environmental Quality's (CEQ's) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (Title 40 Code of Federal Regulations [CFR] parts 1500-1508); *Environmental Analysis of Army Actions* (32 CFR part 651); the Connecticut Environmental Policy Act (CEPA); and the 2011 *The Army National Guard NEPA Handbook*, the CTARNG will prepare an EA that considers the potential consequences of the proposed action on the human and natural environment.

The EA will examine the potential effects of the proposed action and will include analysis of a no action alternative, as required by CEQ regulations. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we are sending this letter to advise you of this effort and to request your assistance in identifying any potential issues related to the proposed action.

The CTARNG's proposed action is to approve the UFC 2-100-01 IMP. The UFC 2-100-01 IMP would inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CTC over the near-term (within 5 years) and long-term (20 years) planning horizon. The UFC 2-100-01 IMP represents a comprehensive approach to developing the CTC using planning strategies that reinforce capabilities to support the CTARNG's mission, promote quality of life, and enhance sustainability and environmental viability at the CTC. The UFC 2-100-01 IMP would replace CTC's current planning document,

which went in to effect in 2001 and no longer provides sufficient direction for future CTC projects. Under the no action alternative, the UFC 2-100-01 IMP would not be approved and the CTARNG would continue to manage the CTC under the 2001 planning document.

Attachment 2 provides the Interagency and Intergovernmental Coordination of Environmental Planning (IICEP) distribution list for agencies and organizations being contacted regarding this EA. If you consider any additional agencies should review and comment on this proposal, please feel free to include them in a re-distribution of this letter and the attached materials.

The CTARNG intends to maximize the use of electronic transmittals during subsequent coordination phases of this project. If you would prefer to receive paper copies of the draft and final EA documents, please indicate this in your response. If not, the draft and final EAs will be provided in an electronic format (e.g., a PDF file on a CD or posted to a website) when they become available for review. Please provide any comments you may have within 30 days of receipt of this letter.

If you have any questions concerning the proposed action, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CT-ARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

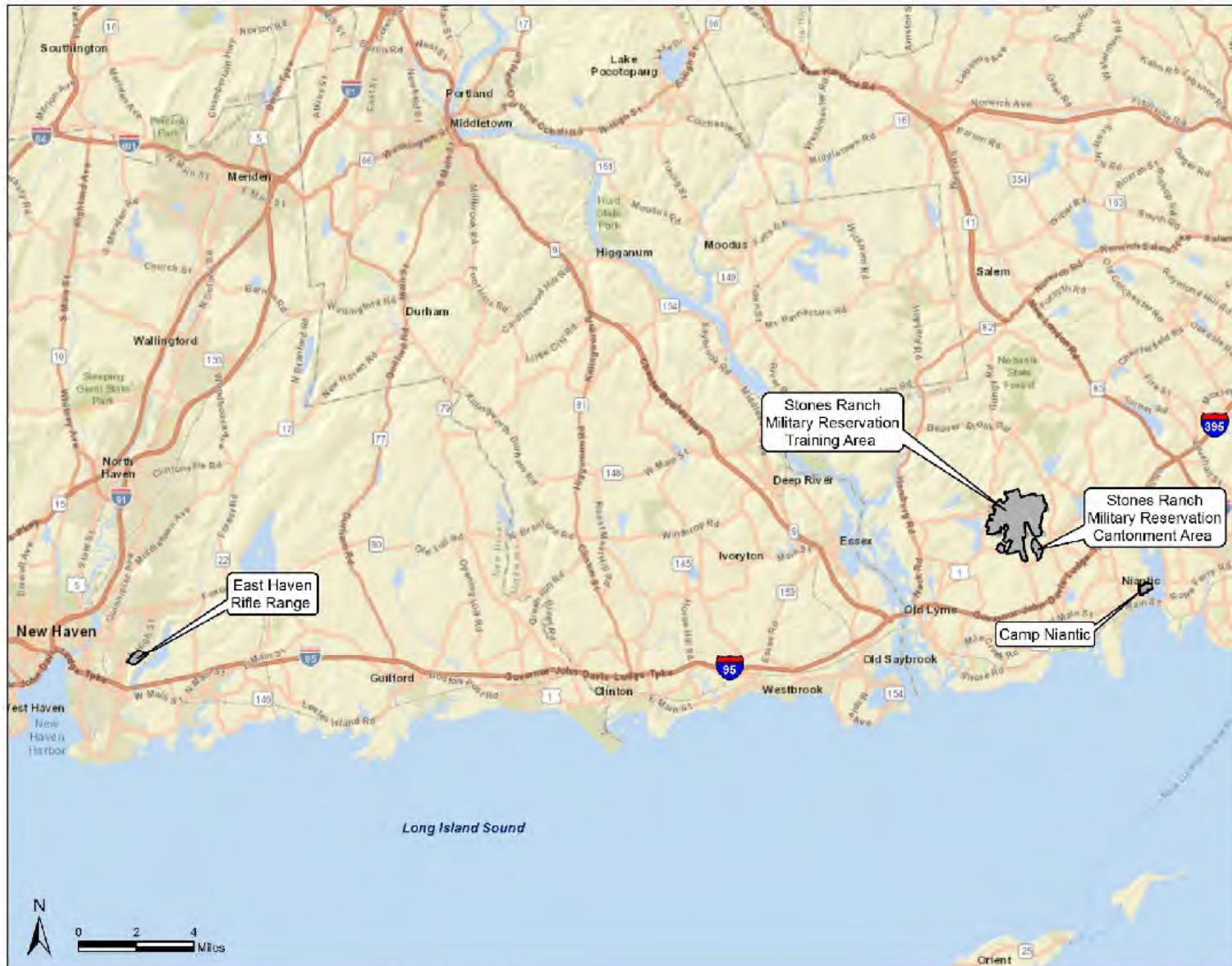
Sincerely,



Mr. Robert Dollak  
Environmental Program Manager  
CT-ARNG

Attachments: 1. Map of CTC Locations  
2. IICEP Distribution List

## Attachment 1: Map of Connecticut Training Center Locations



## **Attachment 2. Distribution List**

### **Environmental Assessment for the Connecticut Training Center Installation Master Plan Connecticut Army National Guard**

#### **Federal Agencies**

Mr. Tom Chapman, Field Office Supervisor  
U.S. Fish and Wildlife Service  
New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301

U.S. Army Corps of Engineers  
New England District  
Regulatory/Permitting Main Office (CT, MA, NH, RI)  
Concord Park  
696 Virginia Road  
Concord, MA 01742

Ms. Alexandra Dunn, Regional Administrator  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109

#### **State Agencies**

Mr. Karl Wagener, Executive Director  
Connecticut Council on Environmental Quality  
79 Elm Street  
Hartford, CT 06106

Mr. David Kalafa, Undersecretary  
Connecticut Office of Policy and Management  
Division of Comprehensive Planning and Intergovernmental Policy  
450 Capitol Avenue  
Hartford, CT 06106

Mr. Todd Levine, Environmental Reviewer  
Connecticut Department of Economic & Community Development  
State Historic Preservation Office  
1 Constitution Plaza  
Hartford, CT 06103

Mr. Rob Klee, Commissioner  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Ms. Anne Gobin, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Air Management

79 Elm Street  
Hartford, CT 06106

Ms. Yvonne Bolton, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
79 Elm Street  
Hartford, CT 06106

Ms. Betsey Wingfield, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
79 Elm Street  
Hartford, CT 06106

Mr. Brian Thomson, Division Director  
Connecticut Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Land and Water Resources Division  
79 Elm Street  
Hartford, CT 06106

Mr. William Hyatt, Bureau Chief  
Connecticut Department of Energy and Environmental Protection  
Bureau of Natural Resources  
79 Elm Street  
Hartford, CT 06106

Mr. James Redeker, Commissioner  
Connecticut Department of Transportation  
2800 Berlin Turnpike  
Newington, CT 06111

Col. George Battle, Commanding Officer  
Connecticut Department of Emergency Services and Public Protection  
Division of State Police  
1111 Country Club Road  
Middletown, CT 06457

### **Municipal Agencies**

Ms. Rita Franco-Palazzo, Chairwoman  
Town of East Lyme  
Planning Commission  
108 Pennsylvania Ave.  
Niantic, CT 06357

Mr. Mike Finkelstein, Chief of Police  
Town of East Lyme  
Police Commission  
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Mr. David Tiffany, Chairman  
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Ms. Kim Groves  
Town of Old Lyme  
Land Use/Planning Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

Trooper Kazimera Morse  
Town of Old Lyme  
Police Department  
Memorial Town Hall  
52 Lyme Street  
Old Lyme, CT 06371

Mr. Christopher Soto, Planning and Zoning Enforcement Officer  
Town of East Haven  
Planning and Zoning Department  
250 Main Street  
East Haven, CT 06512

Mr. Ed Lennon, Chief  
East Haven Police Department  
471 North Hight Street  
East Haven, CT 06512

### **Tribes**

Mr. Kevin Brown, Chairman  
Mohegan Tribe of Indians of Connecticut  
13 Crow Hill Road  
Uncasville, CT 06382

Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matt's Path  
Mashantucket, CT 06338





**DEPARTMENTS OF THE ARMY AND THE AIR  
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360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

TO: Mr. Kevin Brown, Chairman  
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21 September 2018

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Connecticut Army National Guard  
360 Broad Street  
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If you have any questions concerning the proposed action, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CT-ARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

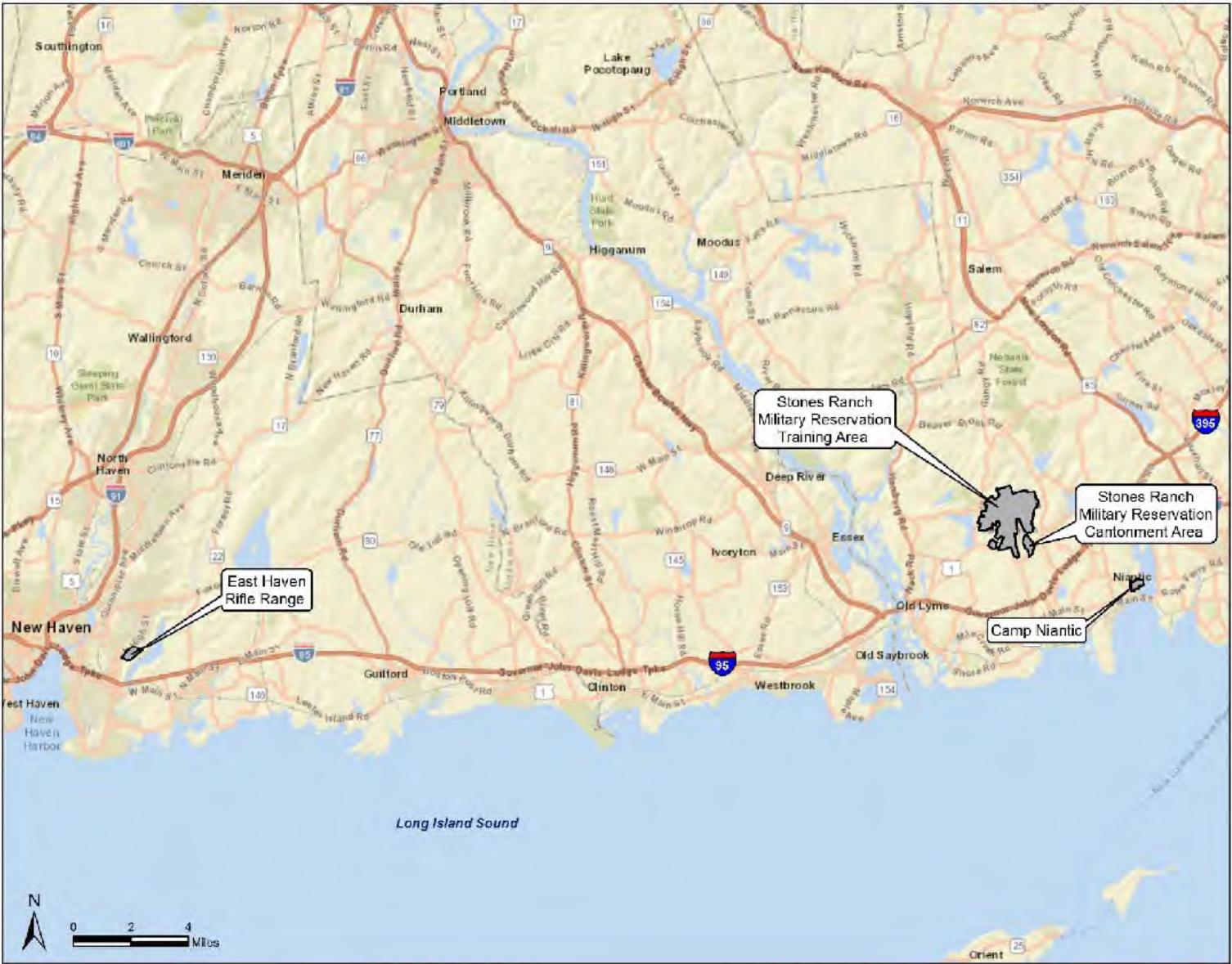
Sincerely,



Mr. Robert Dollak  
Environmental Program Manager  
CT-ARNG

Attachments: 1. Map of CTC Locations  
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# Attachment 1: Map of Connecticut Training Center Locations



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Town of Lyme  
The Board of Selectmen  
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Trooper Kazimera Morse  
Town of Old Lyme  
Police Department  
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Mr. Ed Lennon, Chief  
East Haven Police Department  
471 North Hight Street  
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13 Crow Hill Road  
Uncasville, CT 06382

Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matt's Path  
Mashantucket, CT 06338

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Sent To **Mr. Rodney Butler**  
 Street, Apt. No.,  
 or PO Box No. **2 Matt's Path**  
 City, State, ZIP+4 **Mashantucket CT 06338**

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Total Postage & Fees	\$	

Sent To **Mr. Kevin Brown**  
 Street, Apt. No.,  
 or PO Box No. **13 Crow Hill Road**  
 City, State, ZIP+4 **Uncasville CT 06382**

**Correspondence between CTARNG and Mohegan  
Tribal Nation dated 19 and 20 October 2018**

## Andrews, Emmy

---

**From:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>  
**Sent:** Friday, February 8, 2019 10:00 AM  
**To:** Andrews, Emmy  
**Subject:** FW: [Non-DoD Source] Installation Master plan (IMp) for the Connecticut Training Center (CTC)  
**Attachments:** image001.jpg

-----Original Message-----

From: Dollak, Robert F NFG (US)  
Sent: Saturday, October 20, 2018 8:02 PM  
To: Autumn Cholewa <ACholewa@moheganmail.com>  
Subject: Re: [Non-DoD Source] Installation Master plan (IMp) for the Connecticut Training Center (CTC)

Hello Ms Chowela,

I can send you a copy of our proposed master plan.

Thank you  
Rob Dollak

On Oct 19, 2018, at 3:02 PM, Autumn Cholewa <ACholewa@moheganmail.com <mailto:ACholewa@moheganmail.com>  
> wrote:

<image001.jpg>

Good Afternoon Robert,

My name is Autumn Cholewa. I am the administrative assistant for Mohegan Tribal Historic Preservation Office. I am contacting you at the request of James Quinn to ask that more information on the proposed action be sent to our office.



Kind Regards,

Autumn Cholewa

Administrative Assistant of the THPO and Archaeology Dept.

13 Crow Hill Rd

Uncasville, CT 06382

PH: 806-862-6289

Cell: 860-287-7166

<Dollak Letter.pdf>

**Correspondence between CTARNG and Mashantucket  
Pequot Tribal Nation dated 22 March and 1 April  
2019**

## Andrews, Emmy

---

**From:** Potter, Lori A <LPotter@mptn-nsn.gov>  
**Sent:** Monday, April 1, 2019 4:22 AM  
**To:** Dollak, Robert F NFG (USA); Turnbull, Marissa; Johnson, Michael E  
**Cc:** Andrews, Emmy  
**Subject:** RE: CTARNG Real Property Master Plan Environmental Assessment

Much appreciated, Rob. Thank you.

Have a great week.

Lori Potter  
Director of Public Affairs  
Mashantucket Pequot Tribal Nation

**From:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>  
**Date:** April 1, 2019 at 7:16:19 AM EDT  
**To:** Potter, Lori A <LPotter@mptn-nsn.gov>, Turnbull, Marissa <mturnbull@mptn-nsn.gov>, Johnson, Michael E <MEJohnson@mptn-nsn.gov>  
**Cc:** 'Andrews, Emmy' <Emmy.Andrews@tetrattech.com>  
**Subject:** RE: CTARNG Real Property Master Plan Environmental Assessment

Ms. Potter,

Thank you for your response, we will be sure to forward information pertaining to this project to the Mashantucket Pequot Tribal Nation.

Rob Dollak

-----Original Message-----

**From:** Potter, Lori A [<mailto:LPotter@mptn-nsn.gov>]  
**Sent:** Friday, March 22, 2019 6:56 PM  
**To:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>; Turnbull, Marissa <mturnbull@mptn-nsn.gov>; Johnson, Michael E <MEJohnson@mptn-nsn.gov>  
**Cc:** 'Andrews, Emmy' <Emmy.Andrews@tetrattech.com>; Potter, Lori A <LPotter@mptn-nsn.gov>  
**Subject:** [Non-DoD Source] RE: CTARNG Real Property Master Plan Environmental Assessment  
**Importance:** High

Greetings, Robert -

Thank you for contacting the Mashantucket Pequot Tribal Nation.

I'm looping in our Tribal Historic Preservation Office for their awareness and follow up.

Please feel free to email our office whenever you plan future projects, and we'll be sure to connect you with the appropriate representatives.

Sincerely,

Lori Potter

Lori A. Potter | Director of Public Affairs MASHANTUCKET PEQUOT TRIBAL NATION P.O.Box 3060 | 2 Matt's Path | Mashantucket CT 06338-3060 LPotter@mptn-nsn.gov

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-----Original Message-----

From: Dollak, Robert F NFG (USA) [<mailto:robert.f.dollak.nfg@mail.mil>]

Sent: Friday, March 22, 2019 12:17 PM

To: Potter, Lori A

Cc: Andrews, Emmy

Subject: CTARNG Real Property Master Plan Environmental Assessment

Good Afternoon Ms. Potter,

Several months ago we mailed a scoping document to Mr. Rodney Butler of the Mashantucket Tribe regarding a Real Property Master Plan at our Army National Guard Training Sites headquartered in East Lyme, CT.

We did not hear back from the Tribe so I am re-sending the initial notice and would like to let you know we will soon have the Environmental Assessment available. Please instruct me as to whether or not you would like to receive any additional information from us regarding this project. Alternatively, If you do wish to receive additional information and would prefer to receive future documents electronically please let me know. If we do not hear back from you we will send future documents out as soon as they become available for release.

Thank you for your assistance

Robert Dollak  
Environmental Program Manager  
CT Military Department  
360 Broad Street  
Hartford, CT 06105  
[robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil)  
860-524-4945

## Andrews, Emmy

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**From:** Dollak, Robert F NFG (USA) <robert.f.dollak.nfg@mail.mil>  
**Sent:** Monday, April 1, 2019 6:00 AM  
**To:** Potter, Lori A  
**Cc:** Andrews, Emmy  
**Subject:** FW: Installation master plan  
**Attachments:** CTARNG\_Final\_Optimized.pdf

Ms. Potter,

Attached please find the CTARNG Training Site Master Plan we will follow up with the Environmental Assessment when it becomes available.

Thank you

Rob Dollak  
Supervising Environmental Analyst  
Environmental Program Manager  
CT Military Department  
860-524-4945  
860-883-5977 (cell)

**Letter to Tribal contacts dated 28 May 2019 and  
Mail Receipts**



**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

28 May 2019

MEMORANDUM FOR: Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matts Path  
Mashantucket, CT 06338

FROM: Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

SUBJECT: Final Environmental Assessment and Draft Finding of No Significant Impact for  
Approval of the Connecticut Training Center Real Property Master Plan,  
Connecticut Army National Guard

The Connecticut Military Department/Connecticut Army National Guard (CTARNG) proposes to approve a new Real Property Master Plan (RPMP) for the Connecticut Training Center (CTC) consistent with the requirements of the US Department of Defense (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for developing RPMPs for DoD installations.

The CTARNG has prepared an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic effects of approving the UFC 2-100-01-compliant RPMP. The CTC comprises three noncontiguous installations: Stones Ranch Military Reservation, Camp Niantic, and East Haven Rifle Range. The RPMP is needed to comply with DoD Master Planning policy as well as to guide the CTARNG through the long-term development of the CTC in a clear, sustainable manner that supports the installations' military missions. The Proposed Action would provide an updated master plan to guide the CTARNG's mission at the CTC for the next 20 years using the latest techniques in planning.

You are invited to review the Final EA and Draft Finding of No Significant Impact (FNSI) and submit your comments. A hard copy and CD containing the Final EA and Draft FNSI is provided with this letter. The 45-day public comment period is from 2 June 2019 through 19 July 2019.

If you have any questions, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CTARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

Sincerely

*Rob Dollak*

Mr. Rob Dollak  
Environmental Program Manager  
CTARNG

Attachment:

1. Final EA and Draft FNSI for Approval of the Connecticut Training Center Real Property Master Plan





**DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
CONNECTICUT ARMY AND AIR NATIONAL  
GUARD HEADQUARTERS, JOINT FORCES  
COMMAND NATIONAL GUARD ARMORY  
360 BROAD STREET  
HARTFORD, CONNECTICUT 06105-3795**

28 May 2019

**MEMORANDUM FOR:** Mr. James Gessner Jr., Interim Chairman  
Mohegan Tribe of Indians of Connecticut  
13 Crow Hill Road  
Uncasville, CT 06382

**FROM:** Mr. Rob Dollak, Environmental Program Manager  
Connecticut Army National Guard  
360 Broad Street  
Hartford CT 06105

**SUBJECT:** Final Environmental Assessment and Draft Finding of No Significant Impact for  
Approval of the Connecticut Training Center Real Property Master Plan,  
Connecticut Army National Guard

The Connecticut Military Department/Connecticut Army National Guard (CTARNG) proposes to approve a new Real Property Master Plan (RPMP) for the Connecticut Training Center (CTC) consistent with the requirements of the US Department of Defense (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for developing RPMPs for DoD installations.

The CTARNG has prepared an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic effects of approving the UFC 2-100-01-compliant RPMP. The CTC comprises three noncontiguous installations: Stones Ranch Military Reservation, Camp Niantic, and East Haven Rifle Range. The RPMP is needed to comply with DoD Master Planning policy as well as to guide the CTARNG through the long-term development of the CTC in a clear, sustainable manner that supports the installations' military missions. The Proposed Action would provide an updated master plan to guide the CTARNG's mission at the CTC for the next 20 years using the latest techniques in planning.

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If you have any questions, please contact me at (860) 524-4945. Please send any written comments to me via postal mail at Mr. Robert Dollak, CTARNG, 360 Broad Street, Hartford CT 06105, or via email to [robert.f.dollak.nfg@mail.mil](mailto:robert.f.dollak.nfg@mail.mil). Thank you for your assistance.

Sincerely

*Rob Dollak*

Mr. Rob Dollak  
Environmental Program Manager  
CTARNG

Attachment:

1. Final EA and Draft FNSI for Approval of the Connecticut Training Center Real Property Master Plan

7016 1370 0002 2702 4080

# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

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MASHANTUCKET, CT 06338

Certified Mail Fee	\$3.50
Extra Services & Fees (check box, add fee as appropriate)	\$2.80
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

0232  
13



Postage \$9.25

Total Postage and Fees \$15.55

Sent To  
Street and Apt. Mr. Rodney Butler, Chairman  
Mashantucket Pequot Indian Tribe  
2 Matts Path  
City, State, ZIP Mashantucket, CT 06338

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7016 1370 0001 7733 0972

# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

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UNCAVILLE, CT 06382

Certified Mail Fee	\$3.50
Extra Services & Fees (check box, add fee as appropriate)	\$2.80
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

0232  
13



Postage \$9.25

Total Postage and Fees \$15.55

Sent To  
Street and Apt. Mr. James Gessner Jr., Chairman  
Mohegan Tribe of Indians of CT  
13 Crow Hill Road  
City, State, ZIP Uncasville, CT 06382

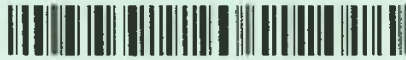
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Rodney Butler, Chairman  
 Mashantucket Pequot Indian Tribe  
 2 Matts Path  
 Mashantucket, CT 06338



9590 9402 2451 6249 1848 62

2. Article Number (Transfer from service label)

7016 1370 0002 2702 4080

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 X **AGENT OF FOXWOODS RESORT CASINO**  
 Addressee

B. Received by (Printed Name) *HSE* C. Date of Delivery *5/30/19*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                               | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery           | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®                    | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input type="checkbox"/> Return Receipt for Merchandise             |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |

Domestic Return Receipt

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. James Gessner Jr., Chairman  
 Mohegan Tribe of Indians of CT  
 13 Crow Hill Road  
 Uncasville, CT 06382



9590 9402 2451 6249 1848 79

2. Article Number (Transfer from service label)

7016 1370 0001 7733 0972

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 X *J. Gonzalez*  Agent  
 Addressee

B. Received by (Printed Name) *J. Gonzalez* C. Date of Delivery *5/30/19*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                               | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery           | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®                    | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input type="checkbox"/> Return Receipt for Merchandise             |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |

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**Appendix C**  
**U.S. Fish and Wildlife Information for Planning and  
Consultation Resource Lists**

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# **Stones Ranch Military Reservation**

# IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

## IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

### Location

New London County, Connecticut



### Local office

New England Ecological Services Field Office

☎ (603) 223-2541

📠 (603) 223-0104

70 Commercial Street, Suite 300

Concord, NH 03301-5094

<http://www.fws.gov/newengland>



NOT FOR CONSULTATION

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

## Listed species

<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

## Flowering Plants

NAME	STATUS
Small Whorled Pogonia <i>Isotria medeoloides</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/1890">https://ecos.fws.gov/ecp/species/1890</a>	Threatened

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

## Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

**Bald Eagle** *Haliaeetus leucocephalus*

Breeds Oct 15 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

**Black-billed Cuckoo** *Coccyzus erythrophthalmus*

Breeds May 15 to Oct 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9399>

**Canada Warbler** *Cardellina canadensis*

Breeds May 20 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

**Cerulean Warbler** *Dendroica cerulea*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/2974>

Breeds Apr 29 to Jul 20

**Eastern Whip-poor-will** *Antrostomus vociferus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Aug 20

**Lesser Yellowlegs** *Tringa flavipes*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

Breeds elsewhere

**Prairie Warbler** *Dendroica discolor*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Jul 31

**Red-headed Woodpecker** *Melanerpes erythrocephalus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Sep 10

**Rusty Blackbird** *Euphagus carolinus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Wood Thrush** *Hylocichla mustelina*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 31

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

**Breeding Season (■)**

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort (|)**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

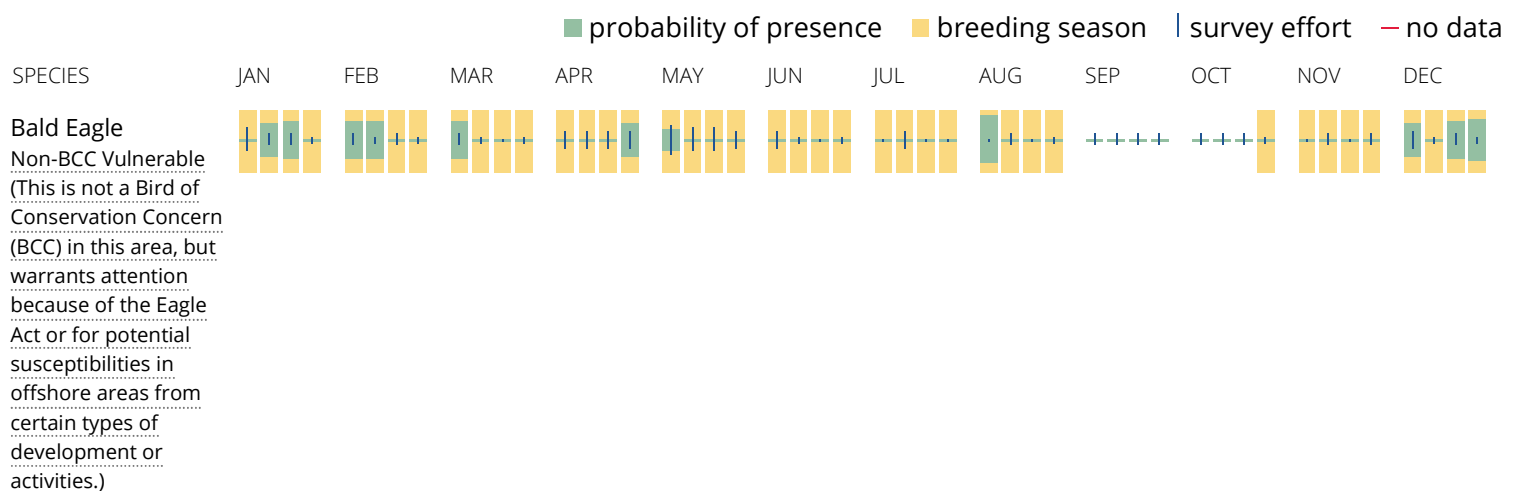
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

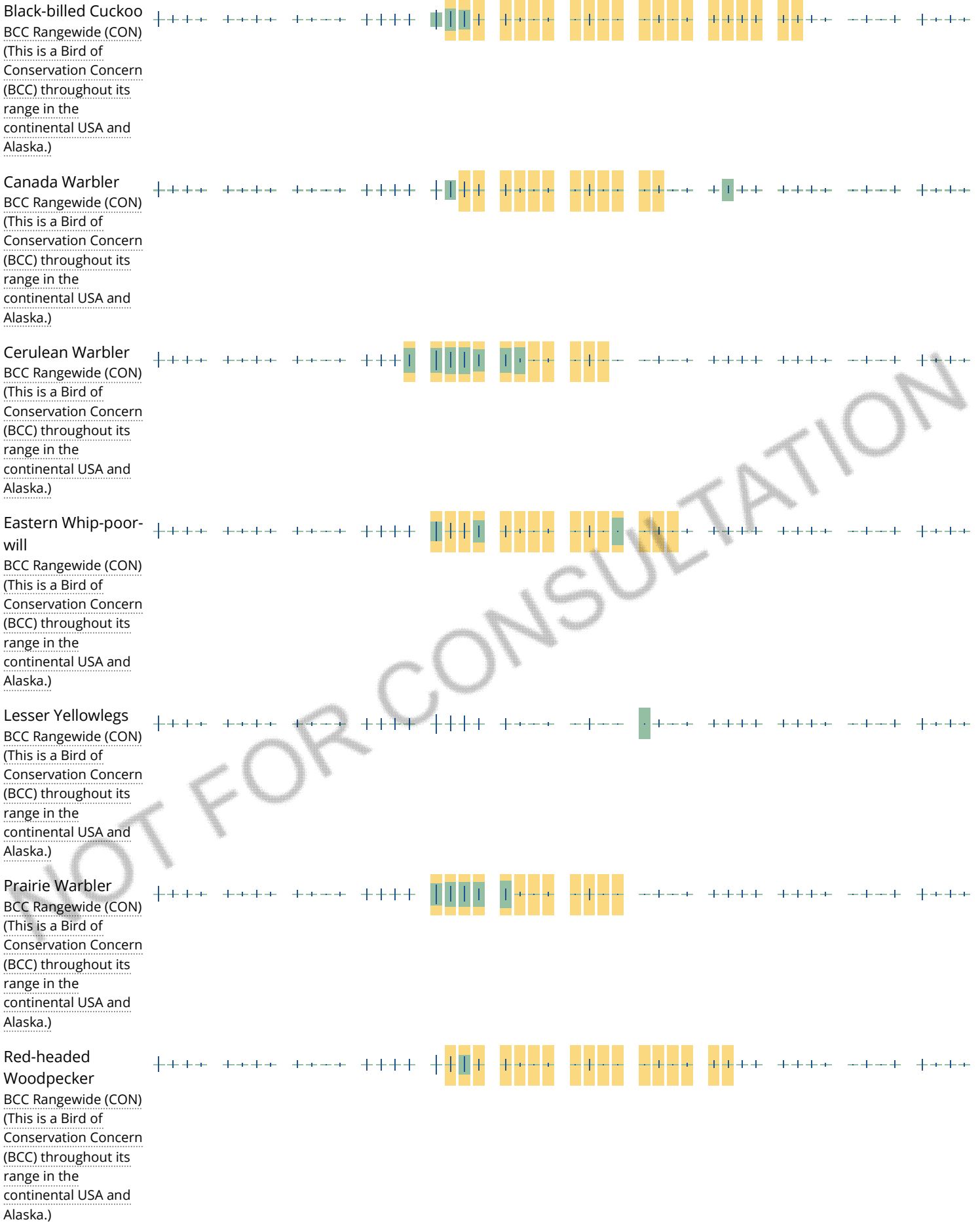
**No Data (—)**

A week is marked as having no data if there were no survey events for that week.

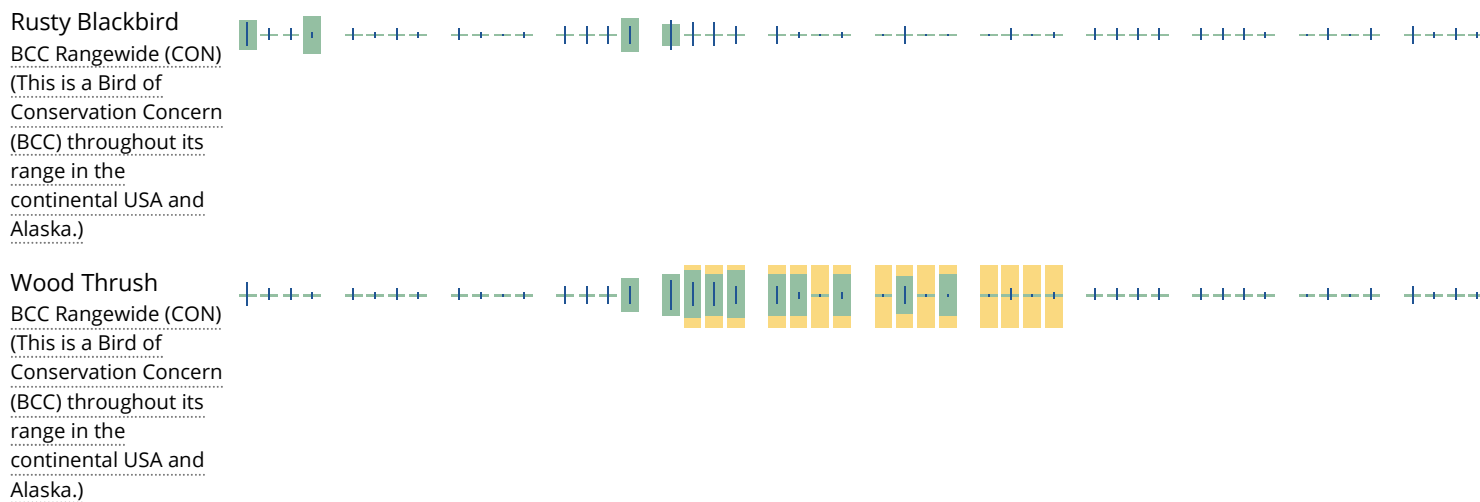
**Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.









**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [E-bird Explore Data Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**



To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and,

therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## Facilities

### National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

### Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

### Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

[PEM1E](#)

[PEM1Ex](#)

FRESHWATER FORESTED/SHRUB WETLAND

[PFO1E](#)[PSS1E](#)[PSS1/EM1E](#)[PFO1/SS1F](#)[PFO1A](#)

#### FRESHWATER POND

[PUBHh](#)[PABH](#)[PABHh](#)[PUBHx](#)

#### RIVERINE

[R5UBH](#)[R4SBC](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

#### Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

#### Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

#### Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

# Camp Niantic

# IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

## IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

### Location

New London County, Connecticut



### Local office

New England Ecological Services Field Office

☎ (603) 223-2541

📠 (603) 223-0104

70 Commercial Street, Suite 300  
Concord, NH 03301-5094

<http://www.fws.gov/newengland>

NOT FOR CONSULTATION

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

## Listed species

<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

## Birds

NAME	STATUS
Roseate Tern <i>Sterna dougallii dougallii</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/2083">https://ecos.fws.gov/ecp/species/2083</a>	Endangered

## Flowering Plants

NAME	STATUS
Small Whorled Pogonia <i>Isotria medeoloides</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/1890">https://ecos.fws.gov/ecp/species/1890</a>	Threatened

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

## Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

[1](#) and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:



- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

American Oystercatcher *Haematopus palliatus*

Breeds Apr 15 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/8935>

**Bald Eagle** *Haliaeetus leucocephalus*

Breeds Oct 15 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

**Black Scoter** *Melanitta nigra*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

**Bonaparte's Gull** *Chroicocephalus philadelphia*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

**Canada Warbler** *Cardellina canadensis*

Breeds May 20 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

**Cerulean Warbler** *Dendroica cerulea*

Breeds Apr 29 to Jul 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/2974>

**Common Eider** *Somateria mollissima*

Breeds Jun 1 to Sep 30

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

**Common Loon** *gavia immer*

Breeds Apr 15 to Oct 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/4464>

**Common Tern** *Sterna hirundo*

Breeds May 10 to Sep 10

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/4963>

**Double-crested Cormorant** *phalacrocorax auritus*

Breeds Apr 20 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/3478>

**Dunlin** *Calidris alpina arctica*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

**Great Black-backed Gull** *Larus marinus*

Breeds Apr 15 to Aug 20

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

**Herring Gull** *Larus argentatus*

Breeds Apr 20 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

**Least Tern** *Sterna antillarum*

Breeds Apr 20 to Sep 10

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

**Lesser Yellowlegs** *Tringa flavipes*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

**Long-tailed Duck** *Clangula hyemalis*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/7238>

**Northern Gannet** *Morus bassanus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**Prairie Warbler** *Dendroica discolor*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Jul 31

**Razorbill** *Alca torda*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds Jun 15 to Sep 10

**Red-breasted Merganser** *Mergus serrator*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**Red-throated Loon** *Gavia stellata*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Ring-billed Gull** *Larus delawarensis*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**Roseate Tern** *Sterna dougallii*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds May 10 to Aug 31

**Ruddy Turnstone** *Arenaria interpres morinella*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

**Rusty Blackbird** *Euphagus carolinus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Semipalmated Sandpiper** *Calidris pusilla*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Short-billed Dowitcher** *Limnodromus griseus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9480>

Breeds elsewhere

**Surf Scoter** *Melanitta perspicillata*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**White-winged Scoter** *Melanitta fusca*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**Willet** *Tringa semipalmata*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Apr 20 to Aug 5

**Wilson's Storm-petrel** *Oceanites oceanicus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Breeds elsewhere

**Wood Thrush** *Hylocichla mustelina*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 31

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

### No Data (—)

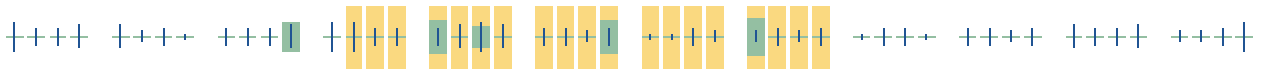
A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

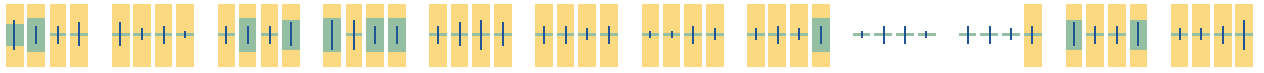
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



**American Oystercatcher**  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



**Bald Eagle**  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



**Black Scoter**  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



**Bonaparte's Gull**  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



**Canada Warbler**  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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Cerulean Warbler  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

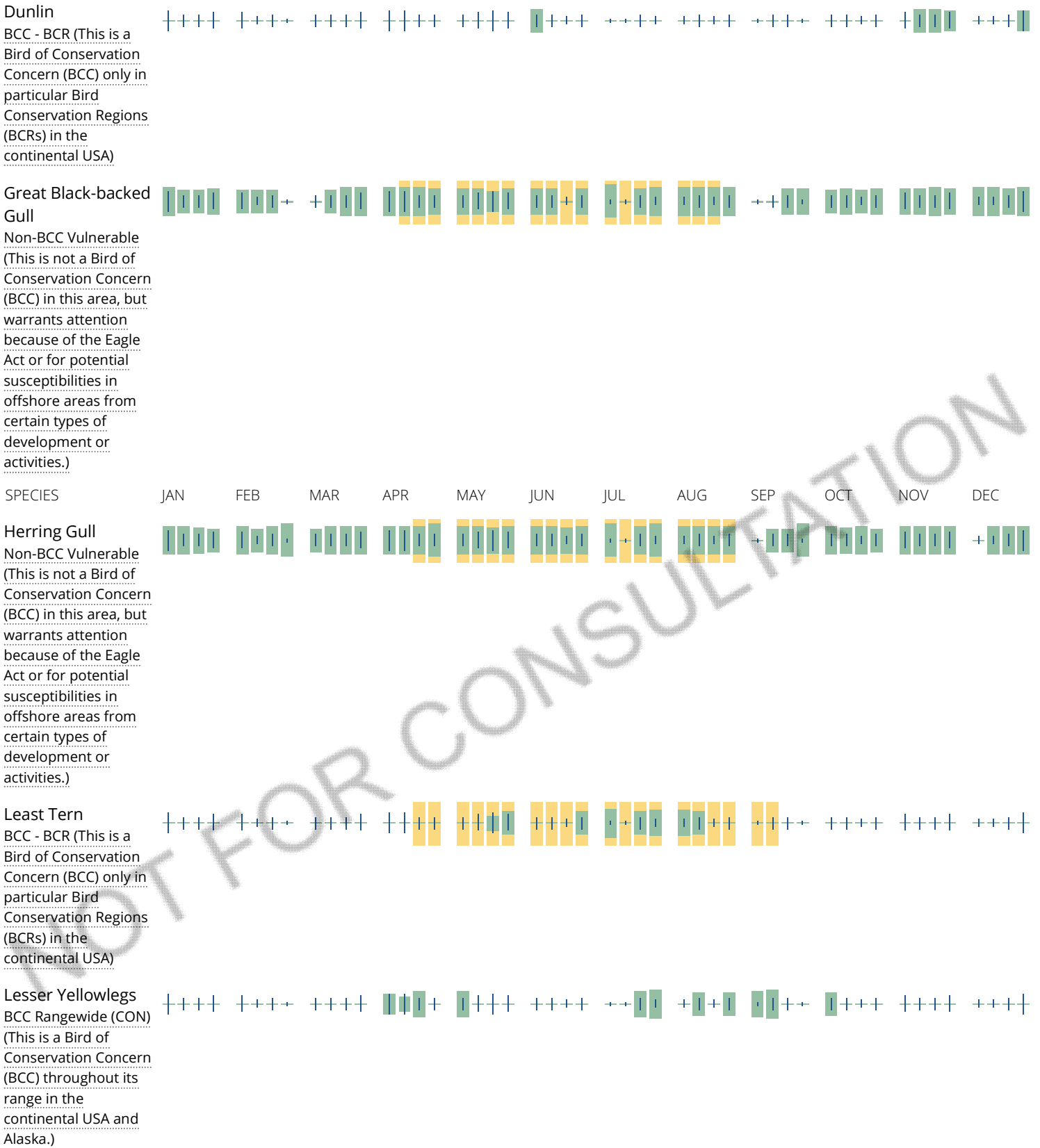
Common Eider  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Common Loon  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Common Tern  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Double-crested Cormorant  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)





Long-tailed Duck  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Northern Gannet  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Prairie Warbler  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Razorbill  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

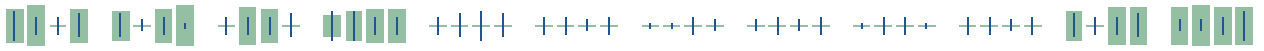


Red-breasted Merganser  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



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**Red-throated Loon**  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



**Ring-billed Gull**  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



**Roseate Tern**  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

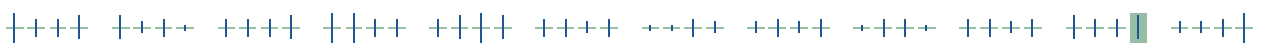


**Ruddy Turnstone**  
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



SPECIES      JAN      FEB      MAR      APR      MAY      JUN      JUL      AUG      SEP      OCT      NOV      DEC

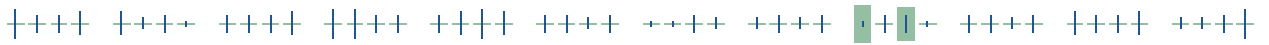
**Rusty Blackbird**  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



**Semipalmated Sandpiper**  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



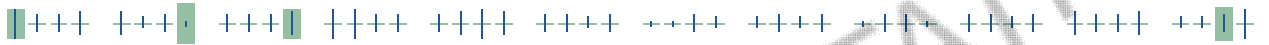
Short-billed Dowitcher  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Surf Scoter  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



White-winged Scoter  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



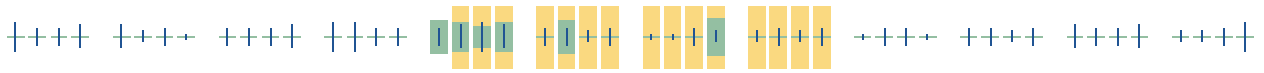
Willet  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Wilson's Storm-petrel  
 Non-BCC Vulnerable  
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Wood Thrush  
 BCC Rangelwide (CON)  
 (This is a Bird of  
 Conservation Concern  
 (BCC) throughout its  
 range in the  
 continental USA and  
 Alaska.)



**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [E-bird Explore Data Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

## What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

## Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review.

Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

## What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

## Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

# Facilities

## Wildlife refuges and fish hatcheries

REFUGE AND FISH HATCHERY INFORMATION IS NOT AVAILABLE AT THIS TIME

## Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

ESTUARINE AND MARINE DEEPWATER

[E1UBL](#)

ESTUARINE AND MARINE WETLAND

[E2EM1/5P](#)

[E2USN](#)

FRESHWATER FORESTED/SHRUB WETLAND

[PFO1E](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

### Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.



### Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION



# East Haven Rifle Range

# IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

## IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Location

New Haven County, Connecticut



## Local office

New England Ecological Services Field Office

☎ (603) 223-2541

📠 (603) 223-0104

70 Commercial Street, Suite 300  
Concord, NH 03301-5094

<http://www.fws.gov/newengland>

NOT FOR CONSULTATION

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

## Listed species

<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

# Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

## Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your

location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

American Oystercatcher *Haematopus palliatus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/8935>

Breeds Apr 15 to Aug 31

Bald Eagle *Haliaeetus leucocephalus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Breeds Oct 15 to Aug 31

Black Skimmer *Rynchops niger*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/5234>

Breeds May 20 to Sep 15

Black-billed Cuckoo *Coccyzus erythrophthalmus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9399>

Breeds May 15 to Oct 10

**Bobolink** *Dolichonyx oryzivorus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Jul 31

**Buff-breasted Sandpiper** *Calidris subruficollis*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9488>

Breeds elsewhere

**Canada Warbler** *Cardellina canadensis*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Aug 10

**Clapper Rail** *Rallus crepitans*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds Apr 10 to Oct 31

**Dunlin** *Calidris alpina arctica*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

**Hudsonian Godwit** *Limosa haemastica*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Least Tern** *Sterna antillarum*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds Apr 20 to Sep 10

**Lesser Yellowlegs** *Tringa flavipes*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

Breeds elsewhere

**Long-eared Owl** *asio otus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/3631>

Breeds elsewhere

**Nelson's Sparrow** *Ammodramus nelsoni*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 15 to Sep 5

**Prairie Warbler** *Dendroica discolor*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Jul 31

**Purple Sandpiper** *Calidris maritima*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Red-headed Woodpecker** *Melanerpes erythrocephalus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Sep 10

**Red-throated Loon** *Gavia stellata*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Ruddy Turnstone** *Arenaria interpres morinella*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

**Rusty Blackbird** *Euphagus carolinus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Saltmarsh Sparrow** *Ammodramus caudacutus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 15 to Sep 5

**Seaside Sparrow** *Ammodramus maritimus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 20

**Semipalmated Sandpiper** *Calidris pusilla*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Short-billed Dowitcher** *Limnodromus griseus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

<https://ecos.fws.gov/ecp/species/9480>



**Snowy Owl** *Bubo scandiacus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds elsewhere

**Whimbrel** *Numenius phaeopus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9483>

Breeds elsewhere

**Willet** *Tringa semipalmata*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Apr 20 to Aug 5

**Wood Thrush** *Hylocichla mustelina*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 31

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .

3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

**Breeding Season (■)**

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort (|)**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

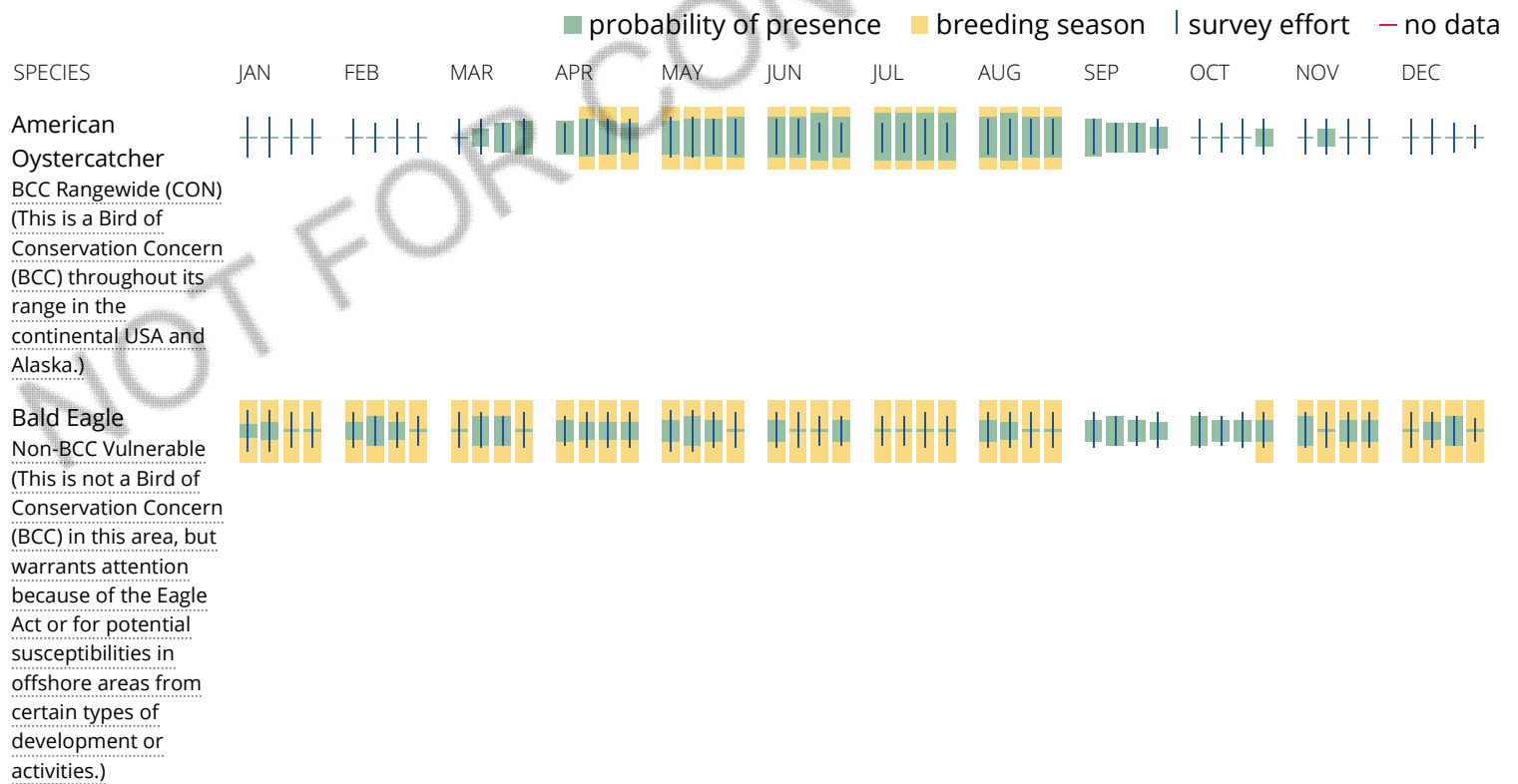
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

**No Data (—)**

A week is marked as having no data if there were no survey events for that week.

**Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Black Skimmer  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Black-billed Cuckoo  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Bobolink  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Buff-breasted Sandpiper  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Canada Warbler  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Clapper Rail  
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Dunlin  
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Hudsonian Godwit  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Least Tern  
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



Lesser Yellowlegs  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



SPECIES            JAN            FEB            MAR            APR            MAY            JUN            JUL            AUG            SEP            OCT            NOV            DEC

Long-eared Owl  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Nelson's Sparrow  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



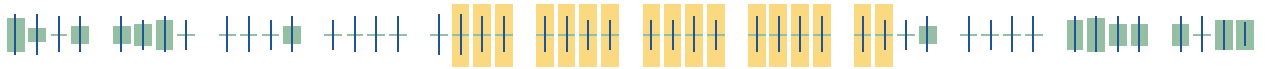
Prairie Warbler  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Purple Sandpiper  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Red-headed Woodpecker  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Red-throated Loon  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Ruddy Turnstone  
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



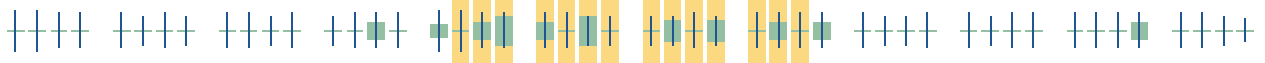
Rusty Blackbird  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Saltmarsh Sparrow  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



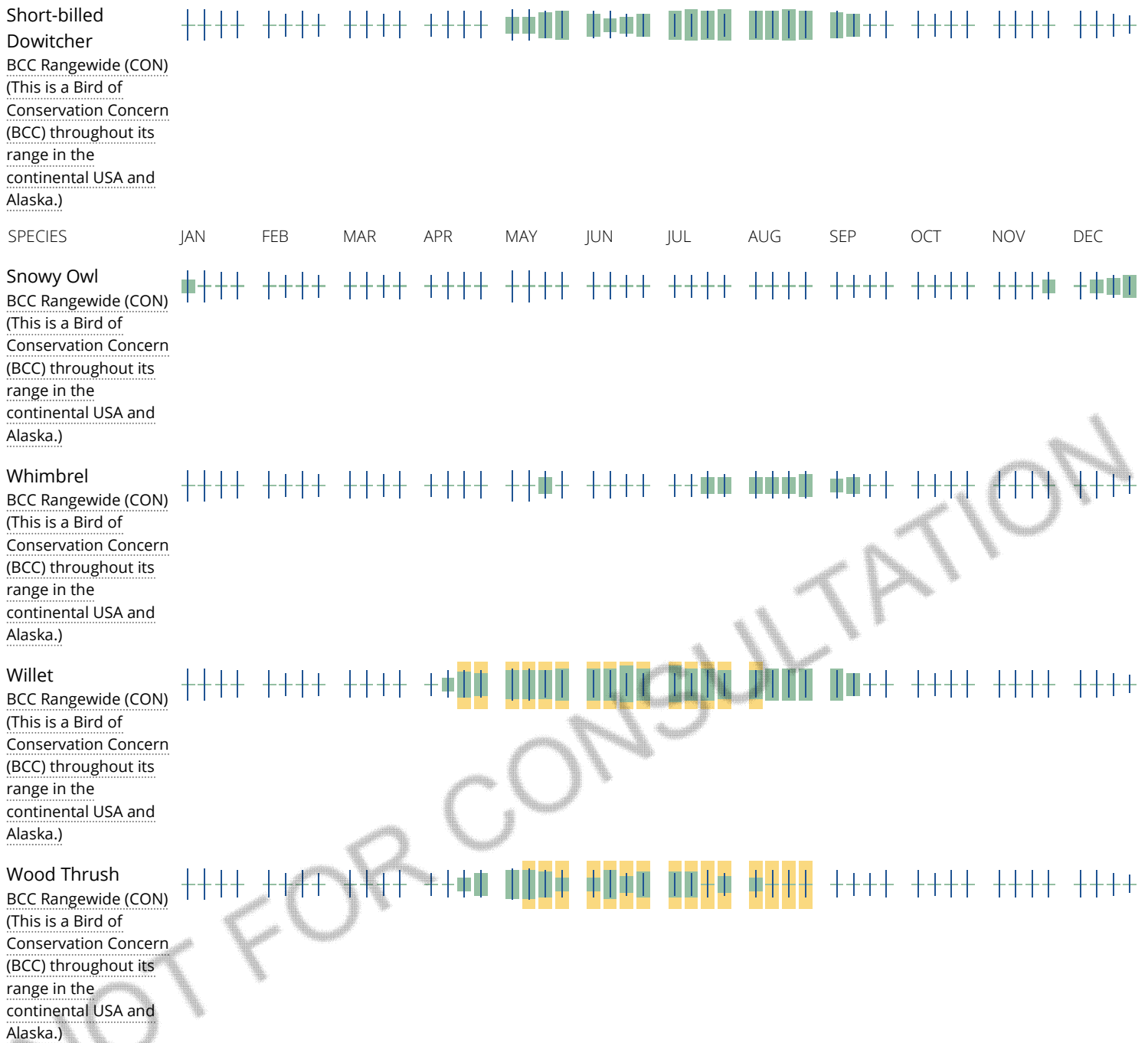
Seaside Sparrow  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Semipalmated Sandpiper  
 BCC Rangewide (CON)  
 (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



NOT FOR CONSULTATION



**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [E-bird Explore Data Tool](#).

### **What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### **How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review.



Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## Facilities

### National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

### Fish hatcheries



THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

# Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

[PEM1E](#)

FRESHWATER FORESTED/SHRUB WETLAND

[PFO1E](#)

RIVERINE

[R5UBH](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

## Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

## Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some

deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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