RECORD OF DECISION

Prepared in accordance with the
Connecticut Environmental Policy Act

Proposed Infrastructure Improvements and Rentschler Field Development

East Hartford, Connecticut

JANUARY, 2007

Sponsoring Agency:
State of Connecticut
Department of Economic and Community Development

Participating Agency:
State of Connecticut
Office of Policy and Management

TABLE OF CONTENTS

TEXT

TABLES

FIGURES

RECORD OF DECISION

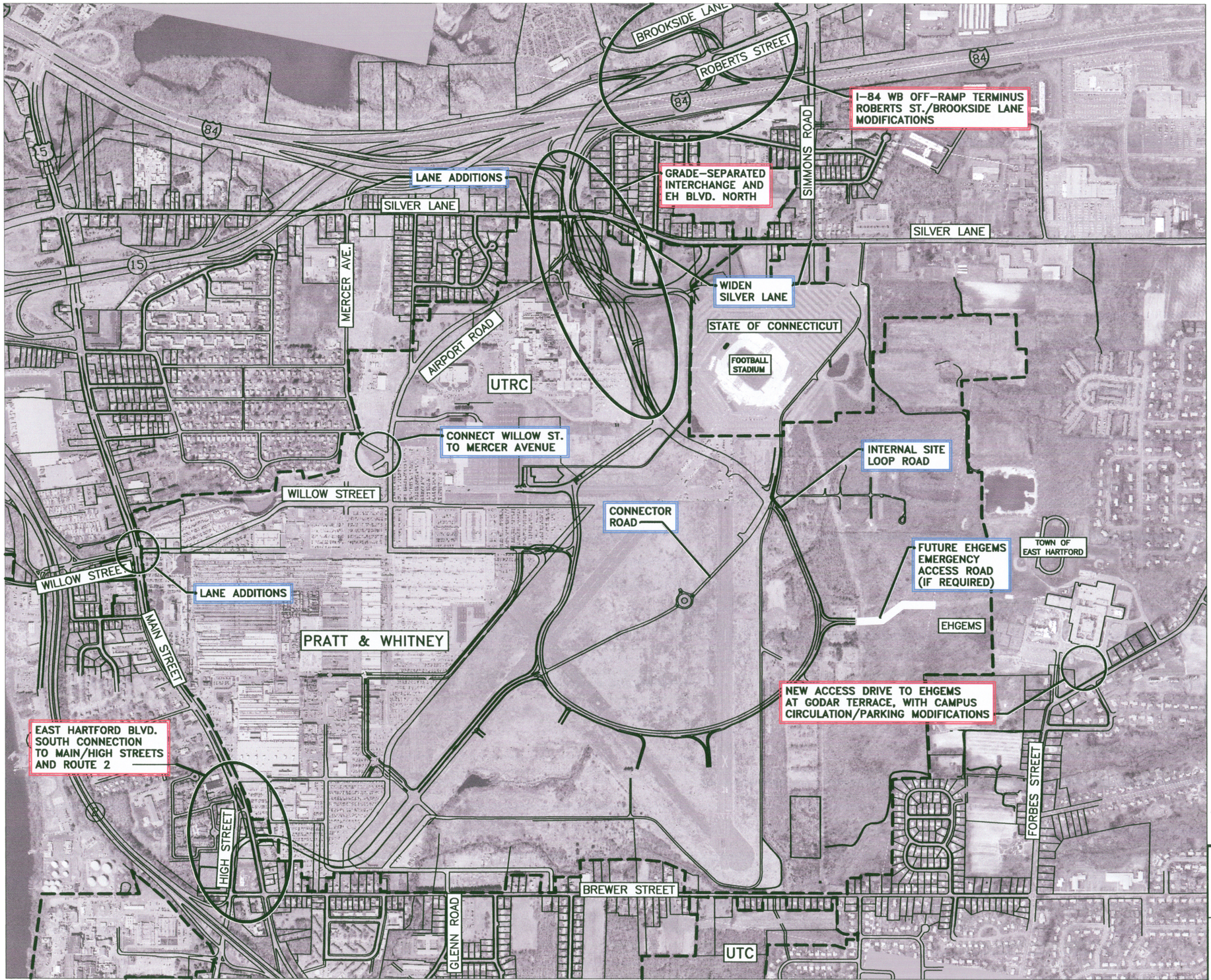
This Record of Decision was prepared for the Proposed Infrastructure Improvements/Rentschler Field Development in East Hartford, Connecticut. This is a follow-up document to the *Proposed Infrastructure Improvements/Rentschler Field Development Environmental Impact Evaluation* prepared in October, 2006. The Connecticut Department of Economic and Community Development (DECD) proposes to administer funds to cover a portion of the cost of the project. The funding would support infrastructure improvements that will be necessary to accommodate the planned redevelopment of Rentschler Field. DECD's funding involvement in the project triggers compliance with the Connecticut Environmental Policy Act (CEPA) and preparation of an Environmental Impact Evaluation (EIE). Approval of the CEPA document is one of the requirements that must be met prior to release of the committed funds.

Description of the Proposed Action

The Proposed Action may consist of the following five state-funded activities:

1. Construction of long term transportation improvements at the Roberts Street/Silver Lane/East Hartford Boulevard North intersection;
2. Construction of long term transportation improvements at the I-84 westbound off ramp at Roberts Street;
3. Construction of long term transportation improvements in the Route 2/Brewer/Main/High Streets/East Hartford Boulevard South area;
4. Development of existing United Technologies Corporation (UTC) land as permanent Stadium parking areas; and
5. Construction of an access road leading to the new East Hartford-Glastonbury Elementary Magnet School (EHGEMS).

These proposed activities are depicted in Figure 1. A general layout of the preferred alternatives for the northern (Roberts Street/Silver Lane/I-84 ramps) and southern (Route 2/Main/High/Brewer Streets/East Hartford Boulevard South areas are depicted in Figures 2 and 3. The State may also provide funding for certain on-site public infrastructure improvements.



LEGEND

UTC PROPERTY BOUNDARY

STATE-FUNDED TRANSPORTATION IMPROVEMENTS

PRIVATELY-FUNDED TRANSPORTATION IMPROVEMENTS

NOTE: SEE FIGURES 1.2.1-2 THROUGH 1.2.1-9 FOR MORE DETAIL ON EACH IMPROVEMENT AREA.

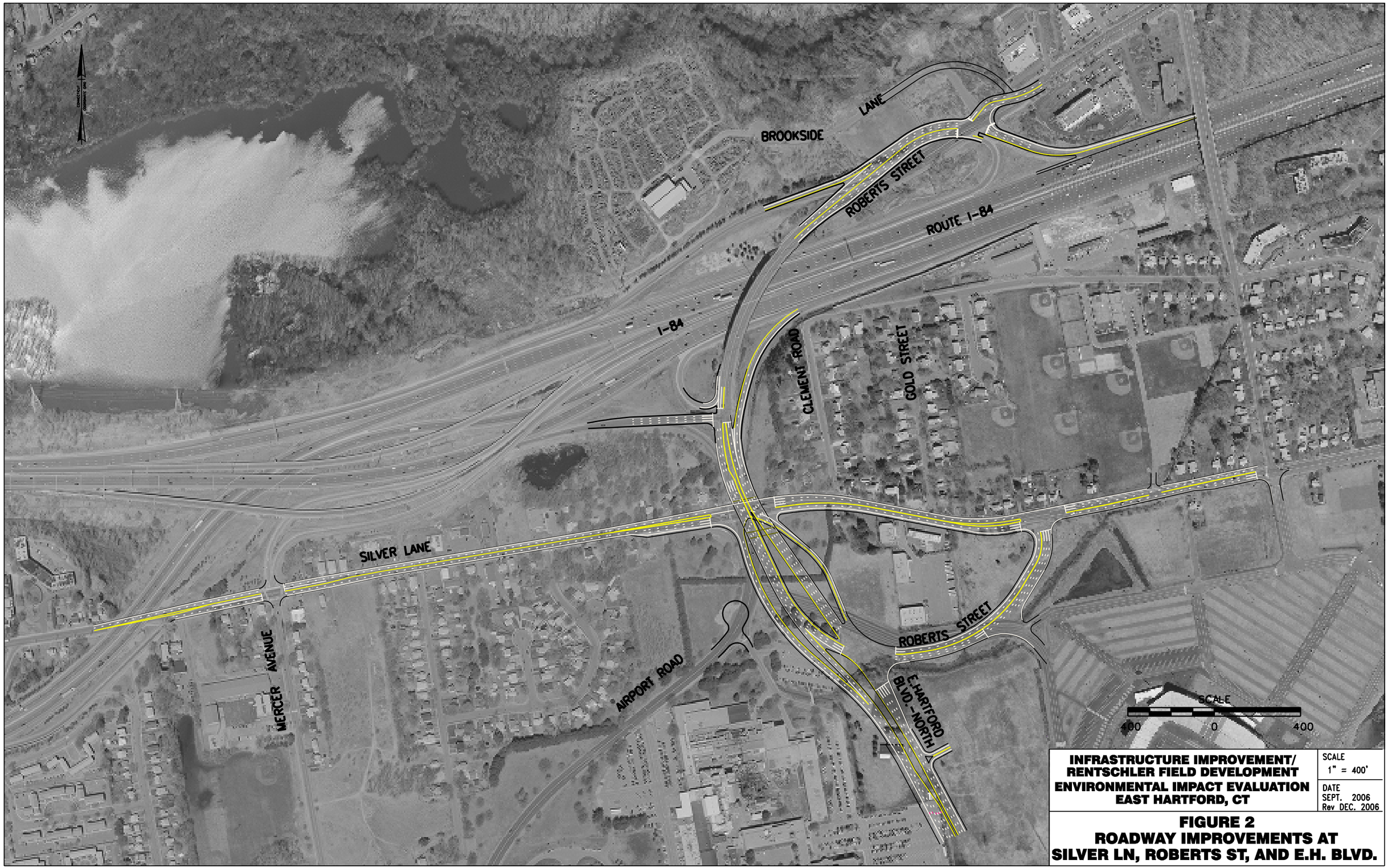
AERIAL PHOTO (SBC, 2002 AND COL-EAST, 2005)

INFRASTRUCTURE IMPROVEMENT/ RENTSCHLER FIELD DEVELOPMENT ENVIRONMENTAL IMPACT EVALUATION EAST HARTFORD, CT

SCALE 1" = 1000'

DATE AUGUST 2006

FIGURE 1
FULL BUILD MASTER TRANSPORTATION PLAN



INFRASTRUCTURE IMPROVEMENT/ RENTSCHLER FIELD DEVELOPMENT ENVIRONMENTAL IMPACT EVALUATION EAST HARTFORD, CT

SCALE 1" = 400'

DATE SEPT. 2006 Rev DEC. 2006

FIGURE 2
ROADWAY IMPROVEMENTS AT SILVER LN, ROBERTS ST, AND E.H. BLVD.

INFRASTRUCTURE IMPROVEMENT/ RENTSCHLER FIELD DEVELOPMENT ENVIRONMENTAL IMPACT EVALUATION EAST HARTFORD, CT

SCALE 1" = 400'

DATE SEPT. 2006 REV. DEC. 2006

FIGURE 3
ROADWAY IMPROVEMENTS AT HIGH ST, MAIN ST, BREWER ST, AND E.H. BLVD. S.

Purpose and Need

The purpose of the Proposed Action is to provide safe and efficient access to the undeveloped portions of Rentschler Field to stimulate economic development and to also provide for future Stadium parking areas and a new access drive to the planned EHGEMS. One of the primary missions of DECD is to facilitate economic growth through the funding and construction of infrastructure needed to support such development. Emphasis is placed on sites which are prime for redevelopment in economically distressed areas such as East Hartford. The proposed transportation improvements are necessary to support approximately 5.7 million sf of mixed use development at a former airport that is currently underutilized. Such a development would create new jobs and substantially add to the gross regional/state product and the tax base of the Town of East Hartford.

The economic impact of the proposed Rentschler Field development to the State of Connecticut and Hartford County, in particular, is significant. The proposed 5.7 million sf of development is forecasted to support approximately 14,700 jobs on-site. In terms of net jobs to the region, from 2007 to 2026 it is estimated that, in any given year, 4,390 net new jobs could be created as a result of the development. This includes direct jobs (on-site), indirect jobs (off-site) and construction jobs. The project could increase the Gross Regional Product by approximately $4.1 billion within Hartford County, averaging $392.7 million per year over baseline projections for the region. New local tax revenues are expected to average $22.7 million annually, with much of this accruing to the Town of East Hartford.

The proposed transportation improvements are needed to provide adequate traffic flow to/from Rentschler Field to facilitate its development. The first phase of development proposed by UTC, the Rentschler Field property owner, and its developer, The Matos Group (TMG), includes approximately 900,000 sf of mixed use that can be accommodated with relatively minor roadway improvements at the Roberts Street/Silver Lane intersection. Development beyond this initial phase of development would result in Level of Service (LOS) deficiencies at many of the critical intersections and roadway segments in the project area, therefore, more substantial roadway improvements would be needed over time. As the project approaches full build, the construction of a grade-separated (flyover) intersection at Roberts Street/Silver Lane/EH Boulevard North will be needed. Upon completion of the first phase, a direct connection from the development to Main and High Streets in the southern portion of the project area will be required to permit development to continue.

The Proposed Action also includes the development of permanent Stadium parking areas on existing UTC-owned land (Item 4). The development of Rentschler Field will impact existing areas used for Stadium parking, namely the existing runways and the grass fields to the immediate west of the Stadium. Therefore, parking must be provided in other areas near the Stadium to allow for site development and Stadium parking to co-exist.

Item 5 involves the need for transportation and utility access to and from a new proposed magnet school to be located to the west of the existing East Hartford High School (EHHS) and Connecticut International Baccalaureate Academy (CIBA) which will also be funded by the State. The preferred access to the magnet school is from Forbes Street through the existing EHHS/CIBA campus. Alternative access routes were evaluated as presented in Section 2.

Alternatives Considered

Alternatives to each of the five state-sponsored activities were explored in depth. Over the course of approximately 2 years, numerous alternatives were developed and evaluated in close coordination with the appropriate state and federal agencies including: Connecticut Department of Transportation (DOT); Connecticut State Traffic Commission (STC); Connecticut Department

of Environmental Protection (DEP); Connecticut Office of Policy and Management (OPM); and, the Town of East Hartford.

The criteria for selection of the preferred alternative for each of the state-sponsored activities are summarized below. Section 2 of the EIE provides maps and descriptions of each alternative and their relative merits relative to the stated goals and criteria.

Roberts Street/Silver Lane Intersection and *Route 2/Brewer/Main/ High Streets Area*
Numerous designs for a new grade-separated intersection at Roberts Street/Silver Lane and a southern connection from Rentschler Field to Main Street and Route 2 were investigated over a 2-year span. Design concepts were developed in conjunction with DOT to achieve the following goals:

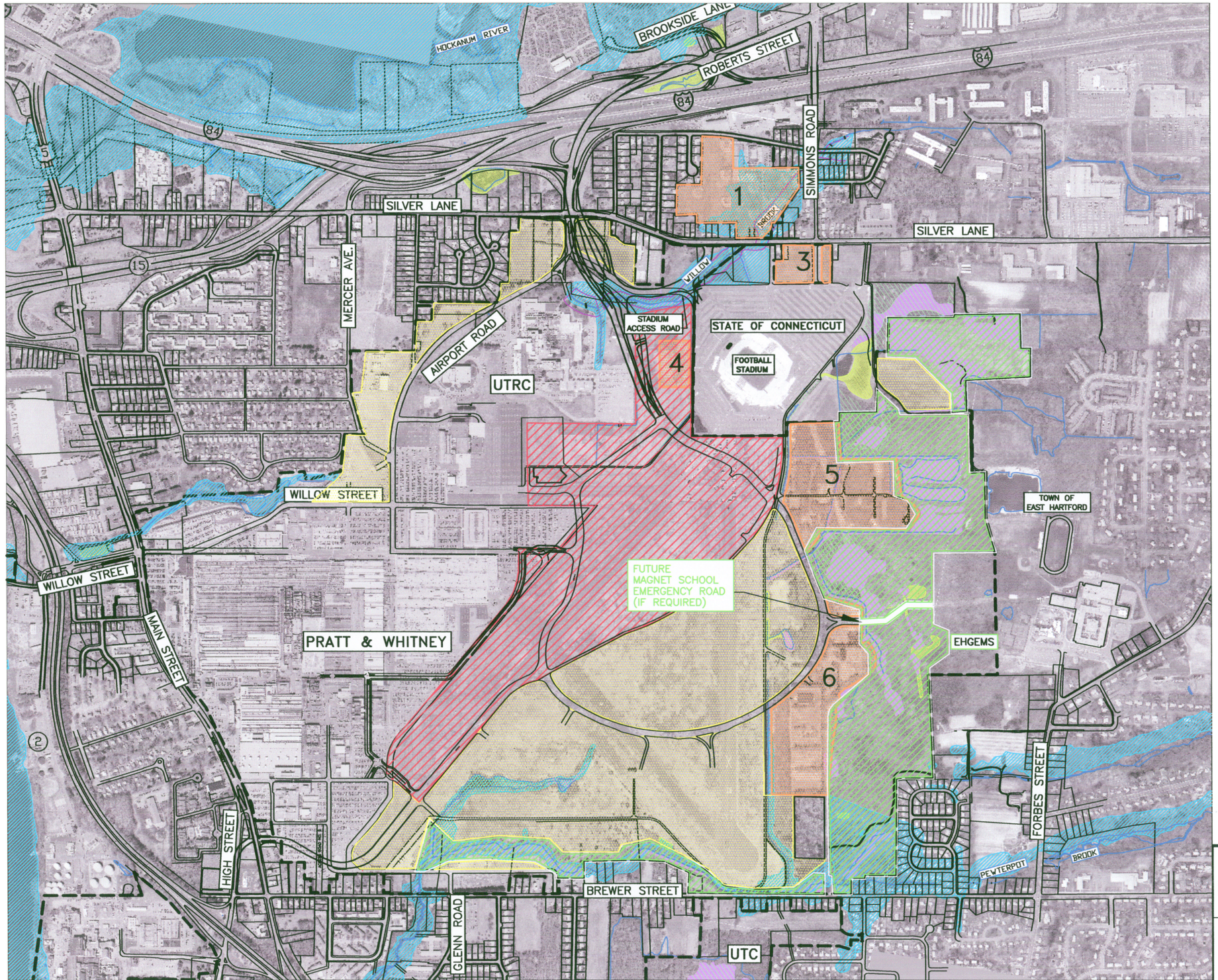
- Accommodate existing and proposed traffic involving approximately 5.7 million square feet of mixed use development at Rentschler Field;
- Improve Stadium generated traffic flow so as to minimize the amount of temporary controls needed during events;
- Allow for traffic flow that does not significantly impact mainline I-84 in the area; and
- Avoid and/or minimize environmental impacts to the surrounding neighborhood and the project area.

I-84 Westbound Off Ramp at Roberts Street
The I-84 westbound off ramp has been designed to minimize wetland and property impacts; nevertheless both are unavoidable given the proximity to these resources. An alternative to realigning the off-ramp would be to create a triple left turn from the ramp to Roberts Street. This would create additional storage on the ramp, which is needed to avoid impacts to I-84 mainline. This was deemed unacceptable to DOT because of safety concerns, particularly weaving traffic patterns on Roberts Street.

Route 2/Main/High/Brewer Streets Area
Over the same two year period, numerous alternatives were evaluated to provide a direct connection from the proposed Rentschler Field Development to the main roadway system in the southern portion of the project area. Design concepts were developed to achieve the following goals:

- Accommodate existing and proposed traffic involving approximately 5.7 million square feet of mixed use development at Rentschler Field;
- Provide a southern access for Stadium events to alleviate event traffic at the northern connection;
- Allow for traffic flow that does not significantly impact mainline Route 2 in the area; and
- Avoid and/or minimize environmental impacts to the surrounding neighborhood and the project area.

Stadium Parking Plan
The Stadium Parking Plan was developed through a coordinated effort between OPM, UTC, TMG and DEP. It is integrally linked to the proposed Rentschler Field Master Plan as proposed by TMG. The goal of the Plan is to designate areas for future Stadium parking so that that the Stadium and the proposed site development can co-exist. The Parking Plan (Figure 4) represents a "snapshot" of where parking will be provided when the site development has been completed. Because site development will occur in phases, updated Stadium parking plans will be developed as needed to adapt to the ongoing construction. However, in general, approximately 65 acres of usable parking area needs to be maintained at all times for the Stadium (exclusive of existing dedicated parking around the Stadium proper).



LEGEND

- UTC PROPERTY BOUNDARY
- OTHER PROPERTY BOUNDARY (MDC)
- WETLANDS – STATE & FEDERAL (1998)
- WETLANDS – STATE ONLY (TOWN APPROVED, 1998)
- WETLANDS – ESTIMATED BY BEC, 2005
- 100–YEAR FLOODPLAIN (CTGIS)
- FLOODWAY BOUNDARY (CTGIS)
- PHASE 1 DEVELOPMENT AREAS
- SUBSEQUENT PHASES DEVELOPMENT AREAS
- AREA BEING CONSIDERED FOR PRESERVATION
- 5 — FUTURE STADIUM PARKING AREAS

SOURCE: ADAPTED FROM TMG, 2006.

NOTE: DOES NOT DEPICT OFF–SITE TRANSPORTATION IMPROVEMENTS.

AERIAL PHOTO (SBC, 2002 AND COL–EAST, 2005)

INFRASTRUCTURE IMPROVEMENT/ RENTSCHLER FIELD DEVELOPMENT ENVIRONMENTAL IMPACT EVALUATION EAST HARTFORD, CT

SCALE 1" = 1000'

DATE AUGUST 2006

FIGURE 4
RENTSCHLER FIELD MASTER PLAN & FUTURE STADIUM PARKING

Alternatives considered included the use of extensive shared parking between proposed future owners/tenants of the development and OPM. Due to the uncertainty of the future needs and uses of the proposed development, shared parking could not be guaranteed to the Stadium, therefore extensive amounts of shared parking was deemed infeasible. However, the proposed Stadium Parking Plan may include some shared parking in Area 4, pending further negotiation between OPM and UTC.

EHGEMS Access Plan
A total of 5 general alternative access routes to the proposed EHGEMS were evaluated. These included: potential access from the proposed internal loop road at Rentschler Field; use of the abandoned UTC road from Brewer Street; and, use of Forbes Street access at the existing EHHS and CIBA. The first two alternatives would result in impacts to forested wetlands as well as habitat for the eastern box turtle, a State Species of Special Concern. Also, the proposed roadways would traverse areas of potential soil and/or groundwater contamination. Due to these environmental constraints and the significant environmental permitting that would be needed to construct these access roads, a proposed access drive from Forbes Street was determined to be the preferred alternative. The alternative access routes were presented at a public informational meeting held at CIBA and a public hearing held at the East Hartford Town Hall. Following these meetings, on July 11, 2006, the Town Council rescinded a January 2004 motion that disallowed any new access along Forbes Street for a new school near the High School. The Council adopted the preferred access plan as presented at the two meetings with several recommendations that will be investigated/implemented during the design phase of the project (Figure 5).

Indirect Actions
The indirect actions are those activities that are not state-sponsored; nevertheless they need to be evaluated in the EIE. The principal indirect action is the proposed redevelopment of Rentschler Field. The indirect actions and their impacts and mitigation are presented in detail in this EIE. Approximately 5.7 million sf of mixed use development consisting of retail, office, research & development, entertainment, recreation, and institutional uses is proposed by TMG as part of its Rentschler Field Master Plan (Figure 4). TMG has received Town Planning and Zoning Approval for the rezoning of Rentschler Field to Design Development District (DDD) which allows for mixed use development and flexibility in design.

Other indirect actions included privately-funded transportation improvements that are needed to support full build development beyond Phase 1. They are shown in Figure 1 and include, in addition to the proposed internal loop roadway system,:

- Lane additions on Silver Lane from the Route 15 ramps to Simmons Road;
- New connection from Willow Street to Mercer Avenue and associated Silver Lane School circulation/parking modifications; and,
- Lane additions at the Main Street/Willow Street intersection.

Environmental Impacts and Mitigation

The environmental impacts of the Proposed Action (i.e. the five state-sponsored activities) have been evaluated in this EIE. In addition, as required by CEPA, the indirect impacts of the Proposed Action have been evaluated. Indirect impacts are those that occur as a result of the Proposed Action by the State. In this case, the state-sponsored transportation improvements will enable the development of the rest of Rentschler Field by providing the necessary transportation access and capacity to the future development site. Indirect impacts are those impacts that will occur as a result of the development of Rentschler Field. Therefore, the indirect impacts are fully presented in this EIE.

NOTE: LAYOUT OF EHGEMS BUILDING, PARKING AND GROUNDS IS CONCEPTUAL ONLY, SUBJECT TO FURTHER DESIGN, ANALYSIS AND PERMITTING.

EHGEMS PARKING
EHGEMS
EHGEMS PARKING
EHGEMS PARKING
BUSES
EHGEMS PARKING
RELOCATED TENNIS COURTS
EHHS/CIBA STUDENT PARKING
TO EHGEMS
CIBA
EHHS/CIBA STUDENT PARKING
EHHS
PARENT DROP-OFF AND CT TRANSIT BUS STOP
STAFF PARKING
STAFF PARKING
HC
VISITORS
EHHS BUSES ONLY
EHHS BUSES & STAFF ONLY
STAFF PARKING
STAFF PARKING
EXIT ONLY
EHGEMS BUSES/ STAFF
MOVE OUTLET AND RELOCATE RIP-RAP SWALE
EXISTING DETENTION BASIN OUTLET
EXISTING RIP-RAP SWALE
CUL-DE-SAC
EXISTING TREE TO REMAIN
2 LANES WB
STREET
EHHS/CIBA STUDENTS, VISITORS, AND ALL EHGEMS TRAFFIC
STOP SIGNS ONLY
FORBES
2 LANES EB
GODAR TERRACE
LEONARD DRIVE RESIDENTS ONLY
NO RIGHT TURN 6:30 AM – 8:30 AM
KEEP STOP SIGNS

LEGEND

- UTC PROPERTY BOUNDARY
- OTHER PROPERTY BOUNDARY (MDC)
- WETLANDS STATE & FEDERAL (1998)
- WETLANDS – STATE ONLY (TOWN APPROVED, 1998)
- WETLANDS – ESTIMATED BY BEC, 2005
- 100-YEAR FLOODPLAIN (CTGIS)
- FLOODWAY BOUNDARY (CTGIS)
- CONVERT TO LAWN
- BRICK PAVERS

NOTE: TOWN COUNCIL RECOMMENDATIONS HIGHLIGHTED IN YELLOW-FRAMED TEXT BOXES.

MAGNET SCHOOL LAYOUT COURTESY OF JCJ ARCHITECTURE, HARTFORD, CT.
AERIAL PHOTO (SBC, 2005)

INFRASTRUCTURE IMPROVEMENT/ RENTSCHLER FIELD DEVELOPMENT ENVIRONMENTAL IMPACT EVALUATION EAST HARTFORD, CT

BEC

SCALE 1" = 200'

DATE AUGUST 2006

FIGURE 5

EH-GLASTONBURY MAGNET SCHOOL ACCESS PLAN WITH TOWN COUNCIL RECOMMENDATIONS

Because the Proposed Action and the associated Rentschler Field site development are such large and long term endeavors, a macroscale "snapshot" approach was used to describe the impacts that would occur over the life of the project, estimated at the year 2020. In addition, the details of the indirect development of Rentschler Field cannot be known at this time as the specific nature and the project will develop over time as a function of market conditions.

The following is a synopsis of the most important environmental impacts and proposed mitigation associated with the project (direct and indirect actions). Additional detail is presented in Section 3 of the EIE. For simplicity, the impacts have been divided into two general categories, major and minor. Major impacts are those that would require substantial mitigation efforts, beyond what is typically required. Minor impacts are those that require a moderate level of mitigation that is typically required as part of other regulatory approval processes.

Major Impacts

Traffic, Parking and Circulation
The proposed development of Rentschler Field is estimated to involve approximately 5.7 million sf of mixed use development that will generate a significant amount of traffic. The purpose of the Proposed Action is to provide the necessary transportation infrastructure to accommodate access to and from the site.

The site development will cause substantial increases in traffic during the AM and PM peak hours on the following roadways:

- Roberts Street;
- Silver Lane;
- Main Street; and,
- High Street.

Relatively minor increases in traffic would occur on Mercer Avenue, Brewer Street and other roads around Rentschler Field.

The increase in traffic will be mitigated by the following roadway improvements as shown in Figures 1, 2 and 3:

- Construction of long term transportation improvements at the Roberts Street/Silver Lane/East Hartford Boulevard North intersection;
- Construction of long term improvements at the I-84 westbound off ramp at Roberts Street;
- Construction of long term transportation improvements in the Route 2/Brewer/Main/ High Streets area;
- Lane additions at the Main Street/Willow Street intersection;
- Lane additions along Silver Lane from the Route 15 ramps to Simmons Road;
- A new connection between Willow Street and Mercer Avenue and associated circulation/parking improvements at Silver Lane School that would facilitate use of the I-84 HOV lanes.

Furthermore, the scale and density of development increases the potential for alternative transportation modes, such as bus service, to and from Rentschler Field. In response to this, Connecticut Transit Bus services will be extended to the interior of the site development. Although no funding has been secured, a proposed Hartford East Busway that could serve the development would also help to alleviate traffic in the area.

Rare Species
The proposed site development would negatively impact several state-listed birds that utilize Rentschler Field. The most notable of these species are the upland sandpiper and the grasshopper sparrow, both of which are State Endangered. These species typically require

extensive open grasslands for nesting. Other state-listed species birds occur on site, however the upland sandpiper and grasshopper sparrow require the largest amount of undisturbed area, therefore these birds have been the focus of annual bird surveys over the last five years.

The eastern box turtle, a State Species of Special Concern, is known to inhabit the deciduous forest of the eastern portion of the UTC property. It is a habitat generalist in that it inhabits forests, wetlands and fields at various stages of development. UTC and TMG are preparing a Conservation Easement Plan that would preserve a substantial portion of this habitat.

The proposed development of Rentschler Field would occur in two general phases. The first phase (Figure 2) would involve the construction of approximately 900,000 sf of development in the northern and western portions of Rentschler Field. Development is anticipated to occur from 2006-2008. This would negatively impact grassland bird habitat, therefore mitigation is required.

On-site mitigation was completed by TMG in March 2006 to restore the portion of Rentschler Field grassland habitat that was overgrown by shrubs and small trees. Natural succession had resulted in the conversion of the grassland fields to shrubs, which is not favorable habitat for grassland birds. The shrubs in the central and southern portions of the airfield were cut and removed from the site, thereby restoring the grassland habitat. DEP observations in 2006 confirmed that the mitigation was successful in creating additional grassland bird habitat at Rentschler Field.

Development beyond Phase 1, south of the "Connector Road", would impact the heart of the grassland bird habitat and would likely result in significant loss of grassland bird viability at Rentschler Field. Therefore, as mitigation, the State proposes to purchase property in the Connecticut River flyway that would serve as replacement habitat. The State has identified several parcels that would be suitable off-site grassland bird mitigation sites. DEP has a contract to purchase a 165-acre site in the flyway. Additional sites are being targeted by DEP that would mitigate for grassland bird habitat impacts beyond the Phase 1 development.

Economics
The economic impact of the proposed Rentschler Field to the State of Connecticut and Hartford County, in particular, is significant. The proposed 5.7 million sf of development is forecasted to support up to 14,700 jobs on-site. From 2007 to 2026 it is estimated that, in any given year, 4,390 net new jobs will have been created as a result of the development. This includes direct jobs (on-site), indirect jobs (off-site) and construction jobs. The project could increase the Gross Regional Product by $4.1 billion within Hartford County, averaging $392.7 million per year over baseline projections for the region. New local tax revenues are expected to average $22.7 million annually, with much of this accruing to the Town of East Hartford.

Properties
The proposed transportation improvements at Roberts Street/Silver Lane/East Hartford Boulevard, the I-84 westbound off-ramp at Roberts Street and the North and Route 2/Brewer/Main/High Streets would require some partial and full property acquisitions.

For the Roberts Street/Silver Lane/East Hartford Boulevard North area, acquisition of a small portion of a residential property (430 Silver Lane) for roadway improvements would be required. This would affect only 5% of the total parcel area and no structures. Acquisition of a portion of the UTC property that fronts Silver Lane would also be required to accommodate the new roadway and associated features.

The proposed roadway improvements to the I-84 westbound off ramp at Roberts Street/Brookside Lane would require partial acquisition of four properties, three of which are privately owned and one of which is state-owned. None of the impacts to private properties would significantly affect the utilization of the properties; however a loss of approximately 10 parking spaces and the

western driveway to Margarita's Restaurant would occur as a result of the Brookside Lane realignment.

For the Route 2/Brewer/Main/High Streets area there would be two full property acquisitions and several partial acquisitions required to implement the roadway improvements. Acquisition of the Shell Service Station at 24 High Street may be required because the transportation improvements would result in a partial property acquisition that will likely render this property unusable, therefore a full property acquisition is likely. Further design and analysis is needed to make a definitive determination.

The other full property acquisition is the vacant parcel to the south (317 Main Street, former Seaparks Department Store) would be necessary. The nail salon located to the immediate north of Augie and Ray's Restaurant would be directly impacted by the proposed East Hartford Boulevard South connection to Main Street. This structure would need to be moved or demolished. One residential property located immediately north of the nail salon would be impacted to the degree that a full property acquisition may be required. More detailed design and analysis is needed to make a definitive determination. Other, smaller scale partial acquisitions would be needed along the west side of Main Street, none of which would affect the utilization of the properties in this area.

Property acquisitions associated with a privately-funded indirect action, the widening of Silver Lane, are potentially more substantial. Many of the homes and commercial businesses along Silver Lane, from the Route 15 ramps to Roberts Street are close to existing road and DOT right-of-way. The traffic analysis has revealed that an additional lane is needed to accommodate full build traffic volumes. This would result in many small-scale property acquisitions in the front yards of residences and businesses along Silver Lane. Most of these impacts would not affect the utilization of the properties; however there are four businesses and two residences that could be negatively affected by the lane addition. Mitigation for these impacts would be required and may include one or more of the following: full property acquisition; physical movement of residences further back into the property; and, replacement of lost parking spaces for the four commercial properties. The use of non-standard roadway cross sections will be considered during the design phase to minimize property impacts. In most cases, widening along the south side of Silver Lane will be favored over the north side to minimize impacts to residential properties.

Contaminated Materials
Contaminated soil and groundwater is present on the existing Rentschler Field site. Studies done by UTC have revealed several areas of concern that require additional investigation and/or remediation in order to allow for development of the land. These areas are primarily located in the southern end of the property, near Pewterpot Brook and the eastern portion of the property where future Stadium parking is proposed.

There are approximately 18 properties that have a moderate or high risk of containing contaminated soil or groundwater along Silver Lane, Roberts Street, Main Street, and High Street that could be impacted by the proposed roadway improvements. Additional investigation will be required for these properties in accordance with applicable state and federal regulations.

Wetlands
The construction of the new grade-separated intersection at Roberts Street and Silver Lane will involve the crossing of riparian wetlands associated with Willow Brook. The concept plan calls for spanning the entire wetland, therefore no significant direct impacts to the wetlands are expected.

The improvements to the I-84 westbound off ramp at Roberts Street/Brookside Lane would impact approximately 45,000 sf of wetlands. This would be mitigated by replacing the lost wetlands to the immediate west of the existing wetland on state-owned property.

There are no wetlands associated with the construction of the transportation improvements at the Route 2/Brewer/Main/High Streets area. There will be no direct impacts to wetlands associated with the transportation access to/from the EHGEMS.

The proposed Rentschler Field site development may directly impact wetlands along the southern and eastern margins of the former airfield. The eastern portion of the proposed loop road, as currently designed, would cross an existing channelized watercourse that drains wetlands from the northeastern corner of the UTC property. A complete design of this crossing has not been made by UTC's developer, TMG; therefore impacts cannot be quantified at this time. The U.S. Army Corps of Engineers (ACOE) and the DEP have directed TMG to investigate the feasibility of avoiding the crossing altogether or completely spanning the channel to minimize impacts to wetlands.

TMG and the ACOE are currently engaged in an effort to preserve a large expanse of the eastern portion of the UTC property for permanent protection through a conservation easement or other legal mechanism. The eastern portion of the UTC property contains a mosaic of forested wetlands and deciduous upland forest that is a valuable wildlife corridor. When implemented, there would be a total of approximately 130 acres of permanently protected open space, much of which is forested wetland.

Flood Zones
The construction of the new grade-separated intersection at Roberts Street and Silver Lane would entail the crossing of a floodway and floodplain associated with Willow Brook. TMG is currently conducting the hydrologic and hydraulic analyses to demonstrate that the existing flood zones, as defined by the Federal Emergency Management Agency (FEMA), are inaccurate (i.e. overstated). Formal redesignation of the flood zones is proposed which would likely minimize the impacts.

The I-84 westbound off ramp at Roberts Street has the potential to impact a minimal area of the 100-year floodplain. Additional mapping and analysis will be conducted during the design phase to determine the exact extent of the 100-year floodplain and the impact of construction on flood storage (if any).

None of the other state-sponsored activities would encroach upon regulated flood zones.

The proposed Rentschler Field development has the potential to impact flood zones associated with Willow Brook or Pewterpot Brook. Currently, the internal road system proposed by TMG does not encroach on flood zones, however building pads along the southern end of the road could encroach upon flood zones of Pewterpot Brook.

Any such development would need to comply with East Hartford Planning and Zoning requirements for impacts to floodways or floodplains. Any activity that involves state funding would also need to comply with Section 25-68 of the CGS to obtain Flood Management Certification.

<u>Minor Impacts</u>

Air Quality
Air quality impacts from increased motor vehicle traffic are expected to be minor. No exceedances of the EPA criteria for carbon monoxide are expected at the most heavily traveled intersections in the study area. On a regional basis, the development of Rentschler Field with the proposed roadway improvements would result in a decrease in pollutant emissions, therefore it will conform to the State Implementation Plan.

Construction at Rentschler Field could result in increased dust emissions and transport to off-site properties. During construction, this will be mitigated by the use of water application, fencing and limiting the amount of exposed earth at any one time.

Noise
The proposed roadway improvements would increase noise levels in the Silver Lane and Main Street areas. However, only one noise receptor, a residence on Main Street (#326) north of Augie and Ray's Restaurant would exceed the FHWA and DOT noise criteria for noise. Mitigation for this impact can be achieved by one or more of the following: shifting the entrance approximately 20 feet further south; installation of new acoustical windows, insulation and air conditioning; or, acquisition of the property. The installation of a noise barrier may offer some attenuation to residents of this property as well, however its effectiveness for noise attenuation for the second and third stories of the structure would be limited. These mitigation options will be evaluated in greater detail during the design phase of the project.

Solid Waste and Recycling
The Proposed Action will generate solid waste in the form of pavement, soil, used utility structures and grass/trees. These materials will be either re-used on-site, if suitable, or hauled off-site to be reused by others or discarded as solid waste in accordance with applicable local and state regulations.

The development of Rentschler Field will generate solid waste during construction and operation of the new facilities. Solid waste will be managed in accordance with applicable local and state regulations.

Aesthetics/Viewsheds
The new grade-separated intersection at Roberts Street and Silver Lane will affect the viewshed of some residents and businesses along Silver Lane from approximately Mercer Avenue to Clement Road. The new view to the intersection would be of a 25 feet high bridge over Silver Lane. This is a negative aesthetic impact that will be addressed in the design process. Special consideration will be given to the architectural treatment of the bridge fascia.

The proposed improvements at the Route 2/Brewer/Main/High Street area will not negatively affect the aesthetics of the area. This area is currently industrial/commercial in nature; therefore the modifications to the roadway system in this area should not negatively affect aesthetics or viewsheds.

The proposed site development will alter the view of the existing Rentschler Field. Multi-story structures are allowed within the DDD and, if constructed, would be visible from residences in the area and motorists along I-84. The architectural design of the structures and supporting infrastructure will contain thematic elements that are complementary, thereby creating a cohesive and coordinated overall appearance.

Historic and Archaeological Resources
The new grade-separated intersection at Roberts Street and Silver Lane will not directly impact any historic structure. However, ancillary widening of Silver Lane in this area and along Silver Lane from the Route 15 ramps to Simmons Road could result in a nominal encroachment on the front yards of some properties that are currently listed or eligible for the National Register of Historic Places. There is the potential for encountering historic artifacts in these areas. Additional studies (Phase 1B) will be conducted in coordination with the State Historic Preservation Office (SHPO).

The development of Rentschler Field will occur in areas that have moderate to high potential for containing intact archaeological resources. The developer will conduct Phase 1B studies in these areas and mitigation, if necessary as determined by the SHPO, will be conducted. For the

Stadium Parking Area #1, the State will conduct Phase 1B studies only if excavation or other work that could affect archaeological artifacts is proposed.

Geology, Topography and Soils
The five activities associated with the Proposed Action will have minimal impacts on the geology, topography or soils of the area. However, the proposed Rentschler Field development will alter the topography of Rentschler Field. In order to provide positive stormwater and sewage flow from the site to Silver Lane and/or Brewer Street, much of the site would need to be elevated. TMG is developing a master grading plan that is aimed at minimizing the amount of fill needed on site to reduce costs and minimize the amount of truck traffic to the site during construction.

Should varved clay be encountered during the excavation for building and utility construction, special handling of this material will be required including possible removal from the site.

Hydrology and Stormwater
Stormwater runoff during construction and operation of the transportation improvements will be managed in accordance with the Connecticut Stormwater Quality Manual and the DEP general permit conditions for stormwater discharge associated with construction activities.

Rentschler Field development projects will also be required to conform to the applicable local and state laws and regulations. The developer has prepared a draft stormwater management plan that is currently being revised. The initial plan calls for a combination of surface and subsurface detention structures with the use of infiltration for roof runoff. A combination of centralized and decentralized stormwater management structures is envisioned for the development where individual development pads would be required to accommodate a certain portion of the peak storm runoff before discharging to a common centralized stormwater system that would provide the additional necessary attenuation before discharging to Willow Brook, Pewterpot Brook or the existing P&W stormwater system.

Utilities
The Proposed Action would require the relocation of existing utilities. This will be done during the design phase of the projects. Permanent lighting is proposed for the future Stadium parking areas. Electrical service will need to be provided from the Stadium or the proposed internal loop road. The requisite utilities are available at the existing EHHS/CIBA campus and along Forbes Street for the construction of the access road to EHGEMS.

The requisite utilities (sewer, water, electricity, and telecommunications) are available along Silver Lane and Brewer Street and at the Stadium. TMG will coordinate with the Metropolitan District Commission (MDC), Connecticut Light and Power (CL&P) and other utilities that would service the proposed development.

Vegetative Communities
The Proposed Action would not significantly alter vegetation in the project area, except for the I-84 westbound off ramp at Roberts Street where the existing forested wetland would be converted to a road (the relocated Brookside Lane).

The areas proposed for Stadium parking currently consist of asphalt pads in disrepair that have been overgrown with a sporadic mixture of shrubs and small trees. The vegetation and asphalt within these areas would be removed and replaced with turf.

The proposed Rentschler Field development would involve the conversion of approximately 300 acres consisting of a mosaic of grassland, shrubland, and pavement to development. The grassland will be mitigated by the State's purchase of other grasslands in the Connecticut River flyway that will be protected in perpetuity. The primary purpose of the grassland mitigation is to provide off-site mitigation for the habitat that is currently used by grassland birds at Rentschler Field.

Long Range State and Local Planning
The Proposed Action would allow for large-scale development of Rentschler Field. This development is consistent with all applicable, local, regional and state plans including the State Plan of Conservation and Development and the East Hartford Plan of Conservation and Development.

Public Safety
According to the Town Chief of Police, the Police Department has adequate resources to service the proposed development. The Town Fire Department has indicated that an additional fire station may be needed to service the development. The possibility of locating a new fire station within the proposed development area has been discussed between the Town and the developer, TMG.

Housing
The proposed transportation improvements would result in impacts to the front yards of some residential properties on Silver Lane. Approximately 28 properties would experience some impacts to their front yards and two properties would be impacted to the extent that the houses may need to be relocated (within the existing property or on a new parcel).

The construction of East Hartford Boulevard South at Main Street would impact an existing multi-family home on Main Street (#326). This could be mitigated by aligning the intersection to the south by approximately 10 feet.

The proposed development would create additional housing stock for the town and the region. Approximately 192 condominium-style units are proposed as part of the Rentschler Field Master Plan.

Environmental Equity
The project area is surrounded by minority and low income population enclaves, however, the Proposed Action would not result in disproportionate negative impacts to minority and low income people. The Proposed Action will enable site development to occur, thus creating additional employment opportunities for local people.

A summary of the environmental effects of the project and the proposed mitigation is presented in Table 1.

Table 1. Summary of Impacts, Mitigation and Review/Permitting Agencies

Issue	Potential Impact	Proposed Mitigation	Review Agency
Traffic	Site development will cause intersection and mainline failures on roadways surrounding Rentschler Field	Roadway construction improvements at; Roberts St. @ Silver La., I-84 WB Off Ramp @ Roberts St., Silver La. from Rt. 15 Ramps to Simmons Rd., Main @ Willow St., Rt. 2 @ Brewer/Main/High St., Mercer Avenue Connection to UTC property. Other roadway improvements include: closure of the Rt. 2 Sutton Ave. ramps and metering of I-84 EB on ramp at Roberts St. For Stadium events, the provision of approximately 65 acres of UTC property. Stadium parking will continue to require temporary traffic controls. Investigate feasibility of permanent variable message signage and other control measures. Scheduling of Cabela's special events outside of Stadium events.	DOT, STC, Town Eng. Dept.
Rare Species	Loss of habitat for endangered grassland birds Impact to potential secondary habitat for eastern box turtle (EBT)	Temporary on-site mitigation completed in March, 2006. Permanent mitigation requires acquisition, management and monitoring of off-site properties by DEP prior to Phase 2 development. Permanent protection of primary habitat in eastern woodlands of UTC property. Pre-construction monitoring of EBT in and near construction sites and relocation of turtles, if necessary.	DEP WD
Wetlands and Flood Zones	Direct impact to wetlands immediately east of Brookside La. @ Roberts St. Direct impact to wetlands and Flood Zones along Willow Brook Potential future site development impacts	Construct mitigation site immediately west of Brookside La. @ Roberts St. during design phase. Develop mitigation plan during design phase. Developer to request Letter of Map Revision from Federal Emergency Management Agency to revise floodway and floodplain boundaries. Permanent preservation of approximately 130 acres of woodland, including large forested wetlands and vernal pools. Coordination on-going between the developer and the USACE.	DEP IWRD, USACE, Town, DEP, FEMA DEP IWRD, FEMA USACE USACE
Fish & Wildlife	Potential impact to wildlife in eastern woodland corridor.	Permanent protection of primary habitat in eastern woodlands of UTC property. Developer will coordinate with DEP regarding the potential for providing fish passage to the southern portion of the unnamed tributary of Pewterpot Brook during the permitting process.	DEP FD
Air Quality	Increased dust during site construction	Use of watering, fencing and limiting amount of exposed earth at any one time.	Town P&Z
Noise/Vibration	Negative impact to residential structure at 326 Main St. Negative impact to 398 Silver La.	Move proposed EH Blvd. South intersection further south; install new windows, insulation and air conditioning or acquire property. Evaluate feasibility/effectiveness of moving flyover further east. Evaluate feasibility/effectiveness of elevated parapet on west side of roadway. Preconstruction survey and monitoring of structure to determine vibration impact. Implement corrective action, if necessary.	Town Eng. Dept, DOT Town Eng. Dept., DOT
Property	Full impact to three commercial properties Partial impact to 79 properties	Acquisition of vacant commercial property at 317 Main St., service station at 24 High St, and vacant wetland property at 400 Roberts St. Compensation to land owners as required by State law. Minimize impact during design process. Roadway widening to avoid residential impacts, where feasible. If necessary, physical relocation of dwellings. Compensation to land owners as required by State law.	Town, DOT Town, DOT
Contamination	Eighteen properties with moderate to high risk of contamination for transportation improvements Site development to occur within areas of known contamination.	Additional study of properties and remediation, if required by State or Federal regulations. Additional investigation and/or remediation in accordance with State and Federal laws and standards.	DEP RD DEP RD
Aesthetics	New bridge of Silver La. will be visible to some Silver La. residents and motorists.	Consider architectural treatment of bridge fascia	Town Eng. Dept., DOT
Historic/Archaeological Resources	Roadway widening could impact buried historic artifacts along Silver La. historic properties Site development in areas of moderate archaeological sensitivity	Conduct Phase 1B archaeological survey for roadway work conducted within historic properties. Conduct Phase 1B archaeological survey for Rentschler Field areas that have been identified as having moderate or high potential for containing archaeological resources. Conduct Phase 1A survey for Stadium Parking Area 1 only if excavation is proposed.	SHPO SHPO
Hydrology and Stormwater	Increase in peak runoff at Rentschler Field due to site development. Decrease in groundwater recharge and stream hydrology	Refinement of existing Stormwater Management Plan and implementation of BMPs to meets the State and local standards for stormwater runoff. Develop site-specific stormwater management plans that maximize stormwater infiltration	Town Eng. Dept., DEP IWRD Town Eng. Dept., DEP IWRD
Utilities	Connections to natural gas, water, sewer and telecommunications required for site development	Developer will coordinate with utilities to ensure adequate connection and supply of resources.	MDC, CNG, SBC
Public Safety	Additional fire protection needed for site development. Emergency access to East Hartford-Glastonbury Elementary Magnet School Public safety vehicular flow/access during construction of Transportation improvements	Potential construction of a new fire station within the Rentschler Field development. East Hartford Fire Department to evaluate the potential need during design. Design engineer will prepare Maintenance and Protection of Traffic Plans that ensure adequate access for emergency vehicles	Town Fire Dept. Town Fire Dept. Town Eng. Dept., DOT

FD = Fisheries Division; WD = Wildlife Division; RD = Remediation Division; IWRD = Inland Water Resources Division; IWWC = Inland Wetlands & Watercourses Commission; P&Z = Planning & Zoning Commission;

Comments on the Environmental Impact Evaluation

A notice of availability for the EIE and notice for a public hearing was advertised in the Environmental Monitor on October 3, 2006 and the document was made available to the public on October 6, 2006. The notice also appeared in the Hartford Courant on October 6, 13 and 20 (see Attachment C). The public review and comment period began on October 6, 2006 and ended on November 20, 2006. A public hearing was held at the East Hartford Town Hall on November 9, 2006 at 6:30 PM.

The EIE was available for inspection during the entire comment period at the East Hartford Town Clerk's Office, The East Hartford Community Cultural Center; Raymond Library; and the Connecticut Department of Economic and Community Development and on the DECD web site.

Verbal and written comments were provided at the public hearing and during the comment period by the following agencies, groups and individuals:

- Connecticut Department of Environmental Protection (DEP);
- Connecticut Council on Environmental Quality;
- Connecticut Department of Transportation;
- Connecticut Department of Public Health;
- Dwight Hahn;
- Janet Rice;
- Unknown citizen;
- Nola Moore;
- Robert Dexter;
- William Thompson;
- Denise Clavette;
- Central Connecticut Bicycle Alliance;
- Jessica Foster;
- Hartford Audubon Society;
- Audubon Connecticut;
- Kevin Sullivan;
- Patrick Cummings;
- Paul Kudra; and,
- Tony Cherolis

The comments focused on the following issues:

- Charter Oak Greenway connection to and through Rentschler Field;
- Incorporating bicycle-friendly features into the design of the roadway improvements;
- The funding mechanisms and management of the selected off-site grassland bird mitigation areas;
- Property impacts along Silver Lane.; and,
- Ancillary design details for the Roberts Street/Silver Lane grade-separated intersection.

Several comments were specific to the development of Rentschler Field which is the secondary action enabled by the proposed infrastructure improvements (i.e. the Proposed Action). These comments would be best addressed during the design and permitting phases of the future development projects. The

Federal, State and local agencies that would regulate these activities have been identified in the response to comments. These comments and responses will be forwarded to the pertinent regulatory agencies for future consideration in their reviews of specific development project.

The following are the substantive comments and their responses. Full comment letters and the public hearing transcript appear in Attachments 1 and 2, respectively.

State of Connecticut Department of Environmental Protection (DEP)
10/20/06 Letter

DEP-1 Comment: *"The Department was involved in developing this mitigation strategy and remains committed to implementing it, including habitat creation, management and monitoring, in-perpetuity. Continuing coordination among the involved parties will be required to successfully implement the mitigation plan."*

DEP-1 Response: The Connecticut Department of Environmental Protection (DEP) has continually coordinated with the Department of Economic and Community Development (DECD) during the CEPA process and will continue to do so in the future through the Grassland Habitat Conservation Initiative. Under this initiative, a Leadership/Policy Committee has been established consisting of State agency representatives that will coordinate future acquisition and management efforts. Key partners include DEP, DECD, USFWS, U.S. Department of Agriculture, Natural Resources Conservation Service, Department of Agriculture, DOT, OPM, CT Audubon, Audubon CT, CT Ornithological Association, The Nature Conservancy, CT Farmland Trust, CT Farm Bureau, Working Lands Alliance, Trust for Public Land, the Wildlife Management Institute, and various sportsmen's conservation organizations and municipalities.

Permitting/Review Agency - DEP Wildlife Division

DEP-2 Comment: *"Table 3.2.7-1 identifies the American kestrel as a species of special concern. The 2004 revision of the list of endangered, threatened and special concern species changed the status of the American kestrel to threatened."*

DEP-2 Response: Correct. The American kestrel is now listed as a state threatened species.

DEP-3 Comment: *"On pages 3-166 and 3-182, the EIE discusses preconstruction surveys for eastern box turtles and notes that if turtles are discovered, they will be relocated to suitable habitat within UTC property. Any relocation of box turtles should be done only after consultation with the Wildlife Division. Julie Victoria is the appropriate contact. She may be reached at (860) 642-7239 or julie.victoria@po.state.us."*

DEP-3 Response: Any work done by the State or the developer that occurs within potential eastern box turtle habitat will coordinated with DEP before construction, as requested. DEP Wildlife Division review of the project will be triggered through any number of permit/review process including the NDPES Stormwater, Section 401 Water Quality Certification as well as other State and Federal permitting processes.

Permitting/Review Agency - DEP Wildlife Division

DEP-4 Comment: *"Page 3-142 describes early coordination efforts to evaluate wetland, floodplain and wildlife issues associated with development of Rentschler Field that resulted in the proposal for permanent protection of approximately 130 acres of the property. It should be clarified that the wildlife issues involved were general wildlife concerns related to wetland regulation and did not focus on protection of listed species."*

DEP-4 Response: Correct. The wildlife issues discussed at the coordination meetings were related to general wildlife issues. However, the preservation of 130 acres of woodland habitat does serve to protect the primary habitat for the eastern box turtle, a state species of special concern.

DEP-5 Comment: *"Page 3-139 states that a DEP inland Wetland Permit will be required for the crossing of Willow Brook by the Roberts Street/Silver Lane intersection reconstruction and Table 4.4-1 notes that the permit is only required for state sponsored projects. The Department regulates wetlands and watercourses in instances where the applicant is a State agency; otherwise, the local wetlands agency has jurisdiction. Roadways funded by DECD typically obtain local wetland permits."*

DEP-5 Response: State funding for the proposed roadway improvements will be granted to the Town, which will be responsible for the design and construction of the improvements. Therefore, local wetland permits will need to be obtained.

DEP-6 Comment: *"Section 3.2.3.5 describes the process of wetland mitigation involving avoidance of wetlands, minimization of impacts and finally compensation for unavoidable impacts. Alternative configurations for the Roberts Street I-84 westbound off-ramp are briefly described. Additional documentation to demonstrate the lack of alternatives that may avoid or minimize the projected 45,000-square foot (s.f.) impact to wetlands would be required during permitting for this project element."*

DEP-6 Response: More detailed alternatives analyses will be conducted during the design phase of the Roberts Street/I-84 Westbound Off Ramp intersection. Efforts will be made to avoid, minimize and mitigate wetland impacts in this area.

Review/Permitting Agencies - DEP Inland Water Resources Division, U.S. Army Corps of Engineers Regulatory Division, East Hartford Inland Wetlands & Watercourses Commission

DEP-7 Comment: *"However, the East Hartford Boulevard North crossing of Willow Brook presently being reviewed by the Department and the Army Corps of Engineers for a Category 2 Programmatic General Permit would impact 8768 s.f. of Federal/State wetland and 2483 s.f. of State-only wetland. This crossing appears to be in the same location as the 4-lane northbound roadway in the EIE. If this is the case, the projected impact discussed in the EIE refers to both roadway projects, and the second crossing necessitated by the grade-separated intersection will be dramatically less than indicated."*

DEP-7 Response: Coordination between the EIE team and the Development Team was carried out throughout the design process. At the time the EIE developed the conceptual roadway plans to accommodate full build development, detailed design plans for Phase 1 roadway improvements by the developer were not yet developed. Therefore, the EIE team assumed a conservative assessment of potential impacts.

With the Phase 1 roadway design plans in place, it is evident that the wetland impacts reported in the EIE have been overstated for the Willow Brook crossing. For the Phase 1 transportation improvements, there would be an estimated impact of 8,768 sf of federal/state wetland and 2,483 s.f. of state-only. The proposed State-sponsored full build improvements at Willow Brook would result in an additional wetland impact of approximately 2,500 sf of federal/state wetland and 4,000 sf state-only wetland. Therefore, the total impact is estimated at 11,268 sf of federal/state wetland and 6,483 of state wetland.

DEP-8 Comment: *"After discussing the Willow Brook flood mapping revision, page 3-147 states that 'nevertheless, approximately 78,000 s.f. of fill in the floodway and 86,000 s.f. of fill within the*

100-year floodplain would be required.' It is unclear whether these figures refer to the existing or amended floodplains and floodways. In any case, in order to obtain flood certification, it must be demonstrated that there will be no proposed fill or grading in the floodway that will result in any increase (greater than 0.00 feet) in the water surface elevation for the 10- or 100-year event as determined by hydraulic modeling."

DEP-8 Response: The EIE used revised flood zone boundaries by Fuss & O'Neill that were a result of an updated topographical survey of the Willow Brook area. The FEMA flood elevations were applied to the updated topography to develop a revised boundary. However, additional work, including a detailed hydrologic/hydraulic study will be done by the developer to further refine the boundaries. This information is not available at this time.

Permitting/Review Agencies - DEP Inland Water Resources Division, Federal Emergency Management Agency, East Hartford Planning & Zoning Commission

DEP-9 Comment: *"Any work or construction activity riverward of the line will require a permit from the Inland Water Resources Division pursuant to section 22a-342 of the CGS regardless of the funding source."*

DEP-9 Response: The relocation of Brookside Lane may occur within the stream channel encroachment line of the Hockanum River. This will be determined during the design phase. If so, the a stream channel encroachment permit from DEP will be required.

Permitting/Review Agency - DEP Inland Water Resources Division

DEP-10 Comment: *"Page 3-58 lists various stormwater management measures that may be utilized. The TSS removal rates of the listed measures vary significantly. Many of these measures (such as deep sump catch basins, vegetated drainage swales and oil/water separators) are not stand-alone devices that can achieve the required level of stormwater renovation. Therefore, a treatment train of measures would be necessary to meet the general permit's water quality requirement. An alternative to a treatment train methodology is the utilization of primary stormwater treatment measures such as stormwater basins with a permanent pool or a combination of a permanent pool and extended dry detention, stormwater wetlands, infiltration trenches and/or basins and water quality swales."*

DEP-10 Response: Stormwater generated from the site development will be the responsibility of the developer and/or its tenants. The list of available stormwater management measures in the EIE was created by the developer in its overall Stormwater Management Plan for the site. This Plan does incorporate, at a conceptual level, a treatment train approach to stormwater management. This Plan will continue to evolve as Master Plan elements are phased in and more detailed design plans are developed for each project. The developer and/or its tenants will be responsible with compliance to DEP's stormwater management regulations.

DEP-11 Comment: *"In order to maximize TSS removal efficiency and minimize re-suspension of particles, any hydrodynamic separators which use swirl concentrator/cyclonic flow technology, must be installed off-line. Please note that the Department does not recommend the use of baffled gross particle separators due to their low TSS removal efficiency."*

DEP-11 Response: See Response to DEP-10.

DEP-12 Comment: "*The use of copper or galvanized roofs, trims or drainpipes should be avoided in building design. The use of galvanized guardrails or catch basin grates on the site should also be avoided. Coated galvanized guardrails could be used as a substitute."*

DEP-12 Response: The developer and/or its tenants will be responsible for complying with applicable DEP stormwater permitting requirements. During that time, the building roofing and drainage system requirements and details will be presented to DEP as part of the permit application process.

DEP-13 Comment: *"Ideally, a PCP[Pollution Control Plan] for the full build out development plan should be prepared, which includes provisions for meeting the water quality requirement (i.e. 80% TSS removal) of the general permit. Without more specific information on future-lot stormwater management measures and the corresponding present day allocation of resources for that purpose, the Department cannot ensure long-term permit compliance. Future space/infrastructure constraints may otherwise prohibit the installation of effective treatment measures."*

DEP-13 Response: See response to DEP-10.

DEP-14 Comment: *"To the extent possible, particularly where parking areas are in close proximity to wetlands and preservation areas, the Department strongly encourages the use of permeable pavement measures such as porous pavement, modular concrete pavers, and plastic/fiber reinforced turf systems. Certain permeable pavement options are not conducive for parking lot applications because of clogging concerns and plowing problems. In such cases, the use of porous pavement may be a more viable option."*

DEP-14 Response: As stated in the EIE, the proposed future Stadium parking areas will likely consist of reinforced turf systems which are currently used for the parking areas immediately surrounding the Stadium. Other, non-permeable, systems will be considered during the design process. Also, the parking area surface design will need to consider the physical and chemical characteristics of the surface and subsurface soils in the proposed parking areas.

DEP-15 Comment: "In development areas where activities will be sited close together, shared parking areas are strongly recommended where possible."

DEP-15 Response: These measures will be considered during the design process for the Stadium parking areas.

DEP-16 Comment: "*The use of additional low-impact development measures such as infiltration islands and/or box tree filters located within parking areas is strongly recommended to manage runoff.*

DEP-16 Response: See response to DEP-10 and DEP-20.

DEP-17 Comment: *"The Department considers asphalt fragments that are smaller than 4 inches to be outside the definition of clean fill (refer to Section 22a-209-1 of the Regulations of Connecticut State Agencies). Therefore, to minimize the stormwater pollution potential, asphalt fragments smaller than 4 inches should not be stored on-site. The Solid Waste Program should be contacted for additional information at (860) 424-3366."*

DEP-17 Response: For the proposed transportation improvements, asphalt fragments smaller than 4 inches will not be stored on site. For the development of Rentschler Field, the storage of asphalt on-site will be subject to the review of DEP as part of the Stormwater Pollution Prevention Plan that is required for compliance with the Stormwater Permit for Construction Activities that is administered by DEP.

DEP-18 Comment: *"In providing this information in 2005, it was expected that it would be incorporated into the EIE, thereby reiterating the value and importance of the river herring run as a unique fisheries resource on the Rentschler field property proposed for development. While a general description of aquatic resources was provided in the Wildlife Section (3.2.6.1), it did not mention the importance of the Pewterpot Brook river herring run relative to existing runs in the Greater Hartford area. It also mentioned that the run was comprised of blueback herring without reference to alewife, which can comprise the bulk of the river herring run in this system. In addition, no mention was made that river herring are also known to utilize the unnamed tributary to Pewterpot Brook on the property. This wetland system, also referred to as Wetland A4, is listed as having no fish habitat value (see table 3.2.3-2). The EIE should be revised to include the aforementioned information."*

DEP-18 Response: As discussed with the DEP Fisheries Division, Pewterpot Brook is habitat for both blueback herring and alewife runs. Also, river herring have been observed in the the lower portion of the tributary to Pewterpot Brook, below the concrete dam. Therefore, Wetland A-4, the unnamed tributary to Pewterpot Brook, particularly the area closest to the confluence with Pewterpot Brook proper, does have fish habitat function and value. The presence of blacknose dace (*Rhinichthys atratulus)* and white sucker (*Castostomus commersoni)* is not unexpected. The referenced table in the EIE has been revised in this Record of Decision as shown in Table 2.

However, fish passage within the unnamed tributary is restricted because of a man-made concrete dam located approximately 700 feet north of its confluence with Pewterpot Brook, somewhat compromising its fisheries function and value. This structure impounds water upstream to create a pond-like feature that was once used as a water source for Pratt & Whitney fire training exercises. Upstream of this pond the unnamed tributary is contained within a 2,300 foot long 60" RCP culvert system beneath the former airfield.

Upstream of the northern end of the culvert is the headwaters of the tributary consisting of a forested wetland system that drains via a series of deeply entrenched man-made ditches. Water depth is shallow within these ditches, approximately 8 inches during most of the year. Water elevation does not increase substantially during the spring and snow melt, with the exception of small beaver impoundments, present in the past (presently breached).

Relative to the anadromous species of migratory alewife (*Alosa pseudoharengus)* and blueback herring (*A. aestivalis),* construction of a fishway at the dam at the lower end of the unnamed tributary would potentially allow the alewife and blueback herring to move further upstream into the pond habitat, which could provide spawning habitat, especially for the alewife. Migration beyond this point, however, would be significantly impeded by the existing 2,300 foot long culvert and low water levels in the culvert, nor would the upstream ditches be favorable habitat for these fish species. Removal of the dam would reduce water levels in the tributary thereby eliminating the potential for anadromous fish habitat in the tributary, as well as adversely affecting wetland habitat.

See also the Response to Comment DEP-21, below.

Table 2. Primary Wetland Functions

Wetland System	Subsystem	Groundwater Protection	Flood Control	Pollution Prevention	Nutrient Removal	Production Export	Shoreline Stabilization	Recreation	Education	Visual/Aesthetics	Uniqueness	Ecological Integrity	Wildlife Habitat	Shellfish Habitat	Fish Habitat	Rare Species Habitat
A	1	X	X	X								X	X		X	
	2	X	X	X								X	X		X	
	3	X	X	X								X	X		X	
	4	X	X	X									X		X	
B	1					X							X			
	2			X	X								X			
	3					X							X			
	4	X	X	X									X			
C	1	X	X	X								X	X			[1]
	2	X	X	X								X	X			[1]
	3	X	X	X								X	X			[1]
	4	X	X	X												[1]
	5	X	X	X								X	X			[1]
	6		X	X								X	X			[1]
	7		X	X								X	X			[1]
	8				X								X			[1]
D	1											X	X			[1]
	2			X	X							X	X			[1]
	3			X	X							X	X			[1]
	4											X	X			[1]
E	1											X	X			[1]
	2											X	X			[1]
	3											X	X			[1]
	4											X	X			[1]
	5											X	X			
F	1		X										X			[1]
	2		X													
G	1		X	X												
	2		X	X	X								X			
	3		X										X			
	4		X	X	X							X	X		X	
H	1				X								X			
	2				X								X			

[1] Secondary habitat for eastern box turtle, a State Species of Special Concern

DEP-19 Comment: *"While the stormwater management plan calls for infiltration of groundwaters to the maximum extent practical, the EIE acknowledges that physical constraints related to property development are likely to limit the practical extent of stormwater infiltration. It is our understanding that Phase I development involves the construction of a Cabela'a outdoor retail facility that could also involve the creation of a recreation pond, initially reported as 10 acres in size. Table 3.1.5-3 lists a wet pond, 15.6 acres in size at pad site 4, the site of the Cabela's store. Given the flat topography of the property and the lack of recipient inflow surface watercourses, water for pond creation would likely be generated from groundwater sources. Since pond development would occur within the Pewterpot watershed, groundwater discharge to Pewterpot Brook will be further impacted by pond development. These additional groundwater impacts should be discussed in the EIE, as should any other potential post-development hydrological alteration not yet addressed that could affect instream flow."*

DEP-19 Response: The developer has plans to create a pond as a feature of the Rentshler Field development, however the pond has not yet been designed. During the design process, the developer and its engineer must consider the effect the pond may have on groundwater and surface water quality and quantity. Several factors need to be studied during the design phase including: the geologic strata of the proposed excavated area; the seasonal groundwater elevation; the physical and chemical condition of the pond bottom; whether the pond would receive stormwater inflow; whether the pond would detain or retain water; the proposed use of the pond and potential perturbation of sediment; waterfowl control; and, algae control. These will all need to be addressed when the developer applies for permits from the Town and DEP.

See response to DEP-20 for additional discussion of groundwater impacts.

Review/Permitting Agency - Town IWWC, DEP Inland Water Resources Division

DEP-20 Comment: *"Thermal loading or increases in ambient surface water temperatures during the summer is a serious concern with any development that results in increases of impervious surfaces, in this case in the amount of an additional 200 acres. Impervious areas act as heat collectors, with heat being imparted to stormwaters as they pass over impervious surfaces. In addition, stormwater temperatures can be elevated from solar radiation as the stormwater is collected and stored in detention basins that would be expected to be constructed as part of stormwater best management practices. Therefore, the EIE should evaluate possible thermal impacts."*

DEP-20 Response: Section 3.1.5.3 of the EIE, under "Site Development Impacts", states that the impervious area on the site is predicted to increase by approximately 200 acres with the proposed development, from 430± acres to 630± acres of total impervious area, according to the *Master Grading and Drainage Plan, Rentschler Field Redevelopment* (Fuss & O'Neill, 2006). The majority of proposed development is expected to occur within pad sites 1D, 4, 6A, 6B, 7B, 8A, 8B, and 8C, which occupy a total area of approximately 340± acres, as shown on Figure 3.1.5-3 of the EIE. The predicted increase in impervious area within these pad sites totals approximately 140± acres.

Impervious surfaces absorb energy from the sun and heat stormwater as it runs off over these surfaces. In addition, stormwater stored in shallow detention basins may also be warmed during summer conditions and then warmer water is discharged to receiving waters when it is displaced by additional runoff. Warmed stormwater runoff can increase water temperatures within receiving waters, potentially leading to thermal pollution consisting of water quality and habitat degradation. Elevated water temperatures result in lower dissolved oxygen concentrations and may cause biological oxygen demand to increase. Certain fish species, particularly cold-water fish, are sensitive to temperature changes and become stressed when temperatures exceed optimum ranges. Macro-invertebrates, which are a primary food source and

are indicators of the overall health of an ecosystem, are also sensitive to water temperature (Roa-Espinosa et. al.).

Reduced infiltration caused by an increase in impervious surfaces is also a contributing factor to thermal pollution. A reduction in infiltration corresponds with an increase in the volume of runoff that is created, resulting in more heated stormwater entering receiving waters. In addition, infiltration may act to moderate water temperatures, as groundwater is usually maintained at a relatively constant temperature, despite fluctuations in surface temperatures (Dane County, WI).

The most significant thermal impacts arise from the "first flush" of stormwater running over heated paved surfaces. As rainfall continues, the surfaces are cooled and the remaining stormwater does not become heated. This first flush of heated stormwater may be cooled by BMPs including rock-filled channels, open vegetated swales, infiltrating surfaces, conduits and rock-filled chambers (Roa-Espinosa et. al.). Vegetative shading reduces direct heating of water bodies, stormwater management basins, and pavement, and highly reflective surfaces reduce heat buildup in pavement.

Potential thermal impacts of site development to receiving waters, namely Willow Brook and Pewterpot Brook, depend on the existing condition of the brooks. As these brooks exist in an urban environment and are currently exposed to unmitigated stormwater runoff from paved surfaces of the airfield and existing development, it is likely that thermal impacts are present already, particularly in Willow Brook. Pewterpot Brook may be more sensitive to thermal impacts, as most proposed development will occur in its watershed.

Infiltration and vegetative shading have been shown to be effective mitigation for stormwater thermal impacts (Kieser, et. Al.). The *Master Grading and Drainage Plan, Rentschler Field Redevelopment* (Fuss & O'Neill, 2006), indicates that infiltration BMPs may be suitable within pad sites 4 and 7B, under consideration of subsurface soil characteristics and potential contamination. These pad sites include approximately 50% of the area of proposed development within pad sites 1D, 4, 6A, 6B, 7B, 8A, 8B, and 8C. Approximately 55% of the total additional impervious area proposed within pad sites 1D, 4, 6A, 6B, 7B, 8A, 8B, and 8C is within pad sites 4 and 7B. This indicates that there is the opportunity to infiltrate a significant portion of stormwater generated over new development. Other BMPs, already proposed in the *Master Grading and Drainage Plan, Rentschler Field Redevelopment* (Fuss & O'Neill, 2006), which have been indicated to provide cooling of stormwater, include underground detention, detention canals, and stormwater transmission swales. Dry detention areas, which avoid additional heating of stored stormwater, are also proposed. Providing vegetative shading of canals and swales, as well as wet detention areas, will reduce additional heating of stormwater.

As individual development projects enter the design and permitting stages, local and State approvals will be required for the discharge of stormwater. At this point, the developer will be encouraged to implementation BMPs that reduce thermal inputs to receiving waters, especially Pewterpot Brook and its unnamed tributary. The analysis above shows that such measures a possible for a large portion of the site.

Review/Permitting Agency - Town IWWC, DEP Inland Water Resources Division

DEP-21 Comment: *"Proposed redevelopment should investigate opportunities to enhance fish passage conditions for river herring at the pond located on the unnamed tributary of Pewterpot Brook. The pond could be managed for river herring spawning and rearing habitat. Fish could gain access to the pond through the installation of a fishway. In addition, enhancement of adult spawning and juvenile habitats within the impoundment should be investigated through modifications such as enlargement, deepening and planting of native vegetation. Inland Fisheries Division staff is willing to work with the project developer to better explore and define these opportunities that will benefit fisheries resources."*

DEP-21 Response: The Proposed Action would have no impact to the existing Pewterpot Brook and its unnamed tributary. Nevertheless, as secondary site development activities occur near these resources, DEP will have the opportunity to work with the developer to investigate potential ways of enhancing fish passage. The feasibility and cost/benefit of providing fish passage to the unnamed tributary to Pewterpot Brook should be explored during the permitting phase of the project at Rentschler Field. Removal of the dam may be disadvantageous to fisheries habitat since it would reduce water levels in the tributary thereby eliminating the potential for anadromous fish habitat in the tributary. Because the spawning and rearing habitat for alewife and herring that could be made available by a fish passage is limited to the impounded pond (due to the upgradient 2300 LF culvert), it will be important to determine that the pond habitat is of sufficient quality to the migratory fish to justify implementation, as opposed to some other form of mitigation. Important factors to consider would be the quality of the pond littoral zone for fish nesting habitat, the existing substrate conditions, and the water quality of the target area, given the historic contamination practices at Rentschler Field. In addition, alterations of the stream hydraulics and hydrology within this urban setting will need to be assessed to avoid any adverse impacts or exacerbation of local flooding.

During the permitting phase of the development projects at Rentschler Field, the feasibility and cost/benefit of providing fish passage to the unnamed tributary should be explored by the developer. There are several factors to consider including the existing substrate conditions and the water quality of the target area, given the historic contamination practices at Rentschler Field. A fishway may need to be cut into the dam, thereby potentially increasing downstream flooding. A hydraulic analysis of the stream system would need to be conducted to determine potential impacts.

Permitting/Review Agency - DEP Inland Waters and Fisheries Divisions

DEP-22 Comment: *"In summary, the EIE should more fully address: 1) measures to avoid reduction in groundwater impacts to Pewterpot Brook, 2) measures to avoid the discharge of heated stormwaters to Pewterpot Brook, and 3) measures to provide for adequate passage conditions for river herring at the pond located on the unnamed tributary of Pewterpot Brook. If after these analyses it is determined that impacts are unavoidable (given the scope of the project and lack of feasible or prudent alternatives), the Department recommends that a fisheries mitigation plan be developed. Inland Fisheries Division staff would be available to discuss the specific components of a fisheries mitigation plan and provide the necessary technical guidance to the project's environmental consultants. They can also be available to conduct onsite field visits, if necessary. The appropriate contact is Brian Murphy who may be reached at (860) 295-9523 or brian.murphy@po.state.ct.us."*

DEP-22 Response: See responses to DEP-18, DEP-20 and DEP-21.

DEP-23 Comment: *"Coordination with the Department is essential during these processes. Maurice Hamel of the Remediation Division is the appropriate contact. He may be reached at (860) 424-3787 or Maurice.hamel@po.state.ct.us."*

DEP-23 Response: During the design phase for the roadway improvements additional studies will be needed to definitively characterize the nature and extent of contamination. As part of these studies, DEP's Remediation Division will be contacted.

DEP-24 Comment: *"A more realistic scenario for the no-build alternative would include only traffic generated by Phase I development, with projected yearly growth. Then the document's analysis*

would evaluate potential impacts of the additional development made possible by the State-financed transportation improvements."

DEP-24 Response: The future no-build scenario was evaluated in order to determine the need of the proposed transportation improvements for the full build development.

DEP-25 Comment: *"However, any regional analysis of increased emissions of ozone precursors, such as those done to evaluate transportation conformity, should consider the additional traffic induced by the transportation improvements."*

DEP-25 Response: As stated on page 3-4 of the EIE, the traffic analysis has shown a network-wide decrease in motor vehicle fuel use for the build alternative compared to the no-build alternative. This would subsequently result in decreased motor vehicle emissions which would, in turn, result in conformance with the State Implementation Plan (SIP).

DEP-26 Comment: *"The document concludes on page 3-12 that 'at present, the environmental need does not appear to justify the use of special emission control equipment.' Due to growing concerns regarding health impacts associated with diesel exhaust, DOT typically incorporates into all contracts for large roadway construction projects a provision requiring contractors to use emission reduction technology to mitigate air quality impacts associated with construction of the project. The emission reduction technology consists of an appropriate EPA or California Air Research Board approved technology. As part of the ISP ACC process, DOT provides documentation to the Department for each project describing the emission reduction technologies used and the types and quantities of construction equipment fitted with each technology. In addition, the DOT includes in all roadway construction contracts a provision that requires the contractor to conform to the DEP anti-idling regulation of diesel engines on the project site. The DPW also includes emission reduction technology and anti-idling requirements in their large construction projects."*

DEP-26 Response: The proposed roadway improvements, which will be implemented by the Town and/or DOT will incorporate provisions in the construction bid packages for contractors to use emission reduction technology to minimize air quality impact.

Permitting/Review Agencies - Town Engineering Department; DOT

DEP-27 Comment: *"If timely funding is not available for these key links in the Charter Oak Greenway to facilitate bicycling to the developing site, the Department recommends that opportunities to expedite construction of the greenway be explored. Providing this supplement to the vehicular access being funded, would result in air quality and other benefits."*

DEP-27 Response: A concept level design has been completed for the east and west linkages to Rentschler Field. Through the Town, the final design and permitting phases will be awarded in the near future. Also, funding is currently available for the design and construction of the Greenway through Rentschler Field. The developer and the Capitol Region Council of Governments are coordinating efforts on the linkages between these Greenway segments. A meeting was held on December 7, 2006 in an effort to expedite the design and construction.

DEP-28 Comment: *"Businesses and corporate entities within the project area and along the Greenway route should be encouraged to incorporate bike racks, showers, etc. into their plans to make it easier for people to walk/bike to those locations. Buses should be fitted with bike racks as well. Street*

crossings should be designed with bicyclists and pedestrians in mind (warning signs, crossing lights and striping, etc.)."

DEP-28 Response: The developer will encourage its tenants to incorporate bicycle amenities into the design of their buildings and grounds.

DEP-29 Comment: *"However, the figure in the EIE only depicts the 'Intersections Studied.' While the following figure does show the regional trip distribution in terms of percentages of traffic assigned to the various regional roadways, the document does not explicitly report traffic volumes projected to be generated by the development of Rentschler Field."*

DEP-29 Response: The projected traffic generation from the proposed full build development is shown in Table 3.

DEP-30 Comment: *"Table 4.4-1 should reference the potential for coverage under the General Permit for the Discharge of Sewer Compatible Wastewater and the General Permit for the Discharge of Domestic Sewage for Rentschler Field site development projects.*

DEP-30 Response: The General Permit for the Discharge of Sewer Compatible Wastewater and the General Permit for the Discharge of Domestic Sewage may be required for site development projects.

State of Connecticut Council on Environmental Quality (CEQ)
10/20/06 Letter

CEQ-1 Comment: *"The EIE should clarify the actions that are subject to the sponsoring agency's decision to pursue or not pursue the project".*

CEQ-1 Response: The five general state actions that may be sponsored by the State are listed on Page ES-1 of the EIE. None of these actions are required to support the Cabela's development, which is currently in the permitting phase, nor are any of these actions required to support additional development on Rentschler Field up to approximately 900,000 sf of development.

CEQ-2 Comment: *"However, the Record of Decision should commit your Department to successful mitigation, including working many years in the future to develop new mitigation sites if the first should fail. In addition to the six steps to successful mitigation listed on page 3-177, there should be a seventh – long-term monitoring of the mitigation sites – and an eighth: adjustments, if necessary to achieve success. This is especially important when the term of the proposed project is likely to extend ten years or more, with no further published environmental evaluations. It is good that agencies are working together to integrate their goals, but more commitment is needed because the current plan could result in achieving one goal (developing the site) and failing to reach another (conserving endangered species)."*

CEQ-2 Response: The implementation of the off-site mitigation plan for Rentschler Field will be managed by the Connecticut Department of Environmental Protection (DEP). After careful consideration it was agreed that DEP is best equipped to ensure that mitigation for the grassland birds is successful. DEP has years of experience in acquiring and managing land for open space preservation and rare species habitat protection. DECD and DEP agree that long term monitoring of the mitigation sites and adaptive management are critical elements of mitigation success. DEP will insure that these

Deleted: ¶

Deleted: ¶

Table 3. Traffic Generation

activities are undertaken. A monitoring plan, including periodic assessment of habitat condition, use of the site by grassland bird species and provisions for adaptive management will be developed for each mitigation site. In addition, the mitigation sites will be owned and maintained by DEP in perpetuity. Funding for the acquisition and management of grassland habitat will be provided primarily through the Recreation and Natural Heritage Trust Program, DEP's Stewardship Account and mitigation funds provided by the developer

The DEP will continue on-going efforts to acquire additional sites to provide off-site mitigation for grassland bird habitat lost as the Rentschler Field site is developed. The implementation of the off-site mitigation plan for Rentschler Field will be managed by the Connecticut Department of Environmental Protection through the Grassland Habitat Conservation Initiative (see response to DEP-1). After careful consideration it was jointly agreed to by DEP and DECD that DEP is best equipped to ensure that mitigation for the grassland birds is successful. DEP has years of experience in acquiring and managing land for open space preservation and rare species habitat protection.

CEQ-3 Comment: *"The EIE should define the mitigation plan, not just mitigation requirements. Will the mitigation plan be aimed at preserving habitat for the same numbers of breeding birds or more? The exact numbers probably are not available yet, but the goal of the mitigation plan should be clearly articulated and committed to in the Record of Decision. The plan should define agencies' responsibilities for implementing the plan and for monitoring success. The DEP's proposed grassland habitat initiative holds much promise, but the Rentschler EIE should be linked to the successful implementing of that initiative. In short, the EIE and Record of Decision should do more than describe the mitigation that is necessary; they should describe the mitigation that will occur and commit to long-term success."*

CEQ-3 Response: The goal of the mitigation plan is to offset the loss of all grassland bird habitat associated with the development of Rentschler Field by acquiring more sites having suitable habitat or characteristics that would enable DEP to create a sufficient amount of grassland habitat for grasshopper sparrows and upland sandpipers. DEP is committed to achieving the mitigation goal and all necessary monitoring and maintenance requirements at each mitigation site in perpetuity. The mitigation requirements in the EIE serve as the standards to be applied to all the off-site mitigation sites to be acquired and managed.

The grassland bird habitat mitigation for Rentschler Field is separate and distinct from the DEP's Grasslands Initiative. The acquisition and management of off-site grassland habitat as mitigation for development of Rentschler Field would occur regardless of the existence of this Initiative. However the Rentschler Field development project has highlighted the need for a comprehensive state-wide grassland habitat protection program

CEQ-4 Comment: "The mitigation for this unusual project relies on the successful implementation of the DEP's grassland habitat initiative. The reasons for this unique relationship should be explained, if for no other reason than to explain why it probably would not be an option for state agencies proposing projects in the future. Future projects should include the costs of mitigation in their budgets."

CEQ-4 Response: Mitigation to address any adverse impacts to habitat and/or wildlife species associated with any project will be evaluated on a case-by-case basis. Also see responses to CEQ-2 and CEQ-3

CEQ-5 Comment: *"The completion of the Charter Oak Greenway is buried in this document. It does not appear on the Full Build Master Transportation Plan (Fig. ES-1), nor on the Rentschler Field Master Plan (Fig. ES-4). It is not mentioned in the executive summary. The greenway is*

an important transportation component and needs to be integrated fully. It is not clear that the road and intersection improvements are being designed to include the greenway. The greenway needs to be designed, paved and landscaped, with very careful attention to where and how it will cross all roadways. The only places where the greenway is discussed are vague: the notation on Figure 3.3.3-1 that says 'Alignment through site will be adjusted to fit new roadway network' and the confirmation on Page 3-213 that the details of the development include 'extension of the Charter Oak Greenway.'" The EIE should explain the process for designing and integrating the greenway, and the Record of Decision should commit to this process. The Council emphasizes this point, because the greenway appears to be almost an afterthought in the current EIE. In the Council's view, the expenditure of state funds on transportation improvements for this project should be conditioned on completion of the greenway, as this is the only likely route to connect the existing portions."

CEQ-5 Response: The Charter Oak Greenway is not part of the Proposed Action, however it is recognized as a reasonably foreseeable action and, therefore, has been included in the EIE. Although it does not appear in Figures ES-1 and ES-4, it is shown in Figure 3.3.3-1 and discussed in that section of the document. The proposed Greenway has been discussed during several interagency working group meetings during the CEPA process. In fact, recently, the Matos Group, the Capitol Region Council of Governments (CRCOG) and the Town of East Hartford have met to further discuss potential linkages of the Greenway through Rentschler Field.

The roadway improvements shown conceptually in the EIE do not depict dedicated Greenway paths because the proposed Greenway path is not proposed to be located in the areas of the proposed major transportation improvement, i.e. the Roberts Street/Silver Lane grade separation and Route 2/Brewer/Main/High Street improvements.

The minor roadway improvements at the Main Street/Willow Street intersection do not depict a dedicated Greenway. However, there is ample room to construct a Greenway at this intersection. The provision for the Greenway linkage to Rentschler Field is currently being coordinated through a Charter Oak Greenway Working Group consisting of The Matos Group, CRCOG, Riverfront Recapture, the Town of East Hartford and its consultants along with input from DOT. A meeting was held on December 7, 2006 and the provision for the Greenway linkage to Rentschler Field was discussed. The linkage from the Charter Oak Bridge to Willow Street and Forbes Street to Simmons Road are currently under design. This will be coordinated with the future linkage through the Rentschler Field site.

Funding for the Greenway linkage between Forbes Street and the Connecticut River was allocated as part of Transportation Efficiency Act (TEA-21) legislation in 1997 and other sources. Funding still remains for the Rentschler Field segment, however it is not known at this time whether this funding, and the required matching funds, are sufficient to construct the Greenway through Rentschler Field. This will be evaluated by the developer in the near future.

State of Connecticut Department of Transportation (DOT)
11/19/06 Letter and 10/30/06 Email

DOT-1 Comment: *"The mapping shown in Figure ES-1 indicates general roadway improvements for the development as being State funded improvements. This statement appears to contradict Section 14-311 of the Connecticut General Statutes which states that the person or company building, establishing or operating a certified development is responsible for 100 percent of the cost of the improvements needed to handle traffic safely and efficiently."*

DOT-1 Response: State funding for the proposed transportation improvements will be granted to the Town of East Hartford. It is one of the primary missions of DECD to provide funding to

municipalities for infrastructure improvements that are essential to support economic development. This project is consistent with DECD's mission and the Town's goals of stimulating economic development. Ultimately, the developer will need to obtain STC certificates for future development projects at Rentschler Field. Development beyond Phase 1 will hinge on the completion of the transportation improvements described in the EIE.

DOT-2 Comment: *"The document minimally addresses cumulative impacts and does not address indirect impacts at all. I suggest that a more detailed description of these impacts be prepared for the final EIE. There are several sources of information available through the world wide web and this office to assist you in developing a methodology."*

DOT-2 Response: The cumulative and indirect impacts of the Proposed Action have been comprehensively addressed in the EIE. Much of the content of the EIE pertains to the proposed development of 5.7 million square feet of development, which is an indirect action with associated indirect impacts. Cumulative impacts have been evaluated in each section of the document by combining the direct action (proposed roadway improvements), indirect actions (proposed site development and privately-funded roadway improvements) and cumulative actions (projects that are expected to occur within the project area.

The impact section of the EIE was structured so that it could be read and understood easily by the reader. As stated in DEP's November 20, 2006 comment letter, "As explained on page 1-24, the direct, indirect and cumulative impacts are grouped throughout the document under two categories, transportation and site development impacts. This simple arrangement, instead of subdividing the impacts into numerous categories, does maintain clarity for reviewers, as noted in the document". For further clarification see pages 1-24 through 1-26 of the EIE.

DOT-3 Comment: *"The I-84 eastbound on-ramp at Silver Lane and Roberts Street should show that the two lanes going to the ramp merge down to one. Also, this ramp may need to be metered under future volumes for full-build to prevent failure of I-84 operations."*

DOT-3 Response: The I-84 EB on ramp is shown to have two lanes leaving Roberts Street then merging to one. (See Figure 2). As discussed in several meetings during the CEPA process, metering of the ramp may be needed to accommodate future development and to prevent mainline I-84 operational failures. This will be evaluated in greater detail during the design process.

DOT-4 Comment: *"The document indicates a need for widening Silver Lane from Route 15 to Roberts Street, with minor 'sliver' property takes, but this has not been shown on any of the mapping."*

DOT-4 Response: The impacts of all the proposed transportation improvements are presented in Section 3.3.2 of the EIE. This section includes maps showing the potential property impacts and a table that lists the potentially affected properties.

DOT-5 Comment: *"Figure ES-2 does not show any widening on the I-84 eastbound off-ramp to Roberts Street. Previous discussions between the Department of Transportation and the developer's representatives have indicated that a four lane approach is required for the full-build out. It is recommended that widening be indicated on the figure to show two left-turn lanes and two right-turn lanes on the ramp approach. Stop bars on each of the intersection approaches and a break in the painted median on Roberts Street should be shown since the intersection will operate under traffic signal control."*

DOT-5 Response: The figure has been revised to show 4 lanes for the I-84 eastbound off ramp approaching Roberts Street. The center lane striping on Roberts has been revised and STOP bars added as shown in Figure 2.

DOT-6 Comment: *"At the relocated Roberts Street (westbound) approach to East Hartford Boulevard North, a stop bar is required since this intersection will also operate under traffic signal control."*

DOT-6 Response: A STOP bar for the westbound approach of the relocated Roberts Street at East Hartford Boulevard North has been added as shown in Figure 2.

DOT-7 Comment: *"Access from Silver Lane to the Pratt & Whitney facility via Airport Road is to be eliminated. It is recommended that a cul-de-sac on Airport Road be shown on Figure ES-2."*

DOT-7 Response: The north end of Airport Road will be a cul-de-sac as shown in Figure 2 in this document.

DOT-8 Comment: *"The document says that there are no necessary improvements required to the ramps for Route 2. However, it has been identified by the Department in previous concept reviews that the westbound on-ramp from Oxford Drive needs to be closed, and the eastbound off-ramp to Sutton Avenue needs to be closed to provide for improvements to the Main Street off-ramp and to address Route 2 mainline weaving maneuvers."*

DOT-8 Response: The Route 2 ramps at Sutton Avenue and Oxford Place have been assumed to be closed with the proposed development of Rentschler Field. It is our understanding that there was a request made that the ramps be closed to help smooth traffic flows on mainline Route 2. In reviewing the volumes using the ramps, combined with observed traffic flow problems on Route 2, it is recommended that the ramps be closed as soon as possible, regardless of the proposed development of Rentschler Field. This was discussed early in the EIE review process with the DOT and Town.

DOT-9 Comment: *"An additional identified improvement to the Route 2 ramps was the relocation of the eastbound off-ramp from High Street to High Court to eliminate the proximity of intersections on High Street."*

DOT-9 Response: The southern offsite improvements shown in Figure 3 are the final recommended improvements. While more significant improvements were discussed during the preparation of the EIE. When the size of the proposed development was reduced to 5.7 million +/- square feet and traffic generation and distribution numbers were approved by DOT, the scope of the improvements was reduced. As shown in the analyses included in the EIE, all intersections studied in the vicinity of the Main Street/High Street/East Hartford Boulevard South intersections will operate at satisfactory levels of service once the proposed development is completed.

DOT-10 Comment: *"Figure ES-3 displays off-site improvements in the southern portion of the project area, which indicate a direct connection to the site from Main and High Streets. This appears to be an interim improvement, as previous discussions revealed that modifications to the Route 2 ramps in this area would be required for the full-build out. This office, therefore, has concerns about the viability*

of the southerly access point under full-build conditions without improvements to the Route 2 at High Street/Main Street interchange."

DOT-10 Response: See response to DOT-9.

DOT-11 Comment: *"Please be advised that the traffic generated by the proposed full-build Rentschler Field development will require improvements to the Route 2 at High Street/Main Street interchange which will necessitate the closure of the Sutton and Cambridge Street ramps. The Department of Transportation is not independently contemplating closing these ramps at this time."*

DOT-11 Response: See response to DOT-8.

DOT-12 Comment: The following is an excerpt from Peter Simmons email to Steve Ulman on 10/30/06.

"He [Jack Carey, DOT] wanted to know why the Preferred Alternative didn't show any proposed improvements to the Route 2 WB Ramp on to Main St. He also wanted to know why the Sutton Ave. Route 2 EB/WB Ramps weren't also closed down as shown in the 2nd alternative."

DOT-12 Response: The closure of the Sutton Avenue ramps was assumed to occur for the future build condition and, therefore, was modeled as such. This ramp closures apply to the preferred alternative and Alternative 2. Only the Alternative 2 figure shows this closure because the figures for the preferred alternative figures do not physically cover the Sutton Ave. area. The Sutton Avenue closure is mentioned in Table 1.2.4-1 as a cumulative action. The potential confusion about the closure of the Sutton Avenue ramps was resolved in a November 6 Letter of Clarification that was sent to all EIE recipients.

Regarding the Route 2 westbound off ramp at Main Street, the EIE analysis shows that improvements at the Rt. 2 WB off ramp at Main Street would not be needed for the future build condition. With the 2020 volumes and the existing 90 second cycle length, the anticipated 95th percentile queue is 600 feet per lane (2 lanes - 600' per lane = 1,200'). There is approximately 1,100 feet of storage currently available (300'+300' in a 2-lane section) and an additional 500' of single lane storage. If the cycle length were to be optimized to 60 seconds, the anticipated queue would be 445'/lane (2 lanes - 445' = 900').

Additionally, the exit ramp is fairly wide and extending the 2 lane section further back from the intersection could be accomplished without great difficulty.

State of Connecticut Department of Public Health (DPH)
10/18/06 Letter

No response required

11/20/06 Letter

DPH-1 Comment: *"After reviewing this document, it was noted that there was no mention of addressing asbestos or lead-based paint issues. Should these materials be encountered during site improvements and/or disturbance of utility infrastructure, these types of activities could result in the*

disturbance of surfaces that may contain lead-based paint and/or asbestos. A written plan that addresses both lead-based pain and asbestos must be included."

DPH-1 Response: The EIE focused on the potential impacts of encountering contamination for the proposed Rentschler Field Master Plan. Since the Master Plan involves primarily the development to the open grass field, the EIE focused on the potential for encountering soil and groundwater contamination, therefore lead-based paint and asbestos were not discussed in detail. A written plan for addressing lead-based paint and asbestos during construction will be prepared during the design phase of the project. Further assessment of existing utilities and structures is needed in order to prepare a plan that addresses the potential concerns of DPH. Assessment and management of such materials will be the responsibility of the party sponsoring each activity. For work within Rentschler Field, UTC, the developer, or its tenants would be responsible. For transportation improvements, the Town of East Hartford or the Connecticut Department of Transportation would be responsible for complying with pertinent state laws related to lead-based paint and asbestos.

Dwight Hahn (DH)
11/17/06 Letter

DH-1 Comment: *"I am not convinced that a No-build Alternative should be so quickly dismissed. I recollect many years where greater than 30,000 employees worked for this company, and other than additional traffic police at shift changes (which today's traffic light technology handles nicely), traffic was tolerable at this intersection."*

DH-1 Response: While the intersection of Silver Lane at Roberts Street can be made to operate at acceptable Levels of Service with today's traffic, capacity analyses indicate that without significant improvements the intersection will fail in the very near future. The scope of improving the intersection at its current location would require significant ROW acquisition along Silver Lane, while not providing enough capacity to accommodate the anticipated 2020 traffic volumes.

DH-2 Comment: *"This alternative would be preferred over the second one presented in section 2.1.3 However, I have concerns with the details associated with any final solution. Section 2.1.2 indicates that the bridge would be 30 feet closer to our property than the existing Roberts Street intersection. My measurement puts that on the edge of our property line. Page 3-23 mentions 'sliver acquisitions' would be required. Moving a road 30 feet closer to our home is not a sliver to me, even if most, if not all of that shift avoids a large acquisition."*

DH-2 Response: The conceptual plan for this grade separated intersection at Roberts Street/Silver Lane shows that the proposed new roadway would be no closer to the property than the existing Roberts Street (See Figure 1.2.1-2 in the EIE). However, in order to accommodate an additional lane on Silver Lane immediately west of this intersection, widening of the roadway would be required. This may involve a relatively small encroachment in the front yard of the property. During the design phase of the project, efforts to avoid impacts to the property will be made. This may include, if feasible, widening the south side of Silver Lane on vacant land owned by United Technologies Corporation (UTC).

DH-3 Comment: *"Any road construction adjoining our property will likely compromise the root system of this tree and I would respectfully request appropriate arborist consultation before disrupting this historic landmark. I am concerned that this effort will permanently damage (if not kill) this tree (which I have spent thousands of dollars to maintain over the years). Additionally, it isn't clear if our driveway location will even be practical after these road changes take place."*

DH-3 Response: A certified arborist will be consulted during the design phase of the project to determine if the roadway improvements would injure the tree.

With relatively small property acquisition along the property frontage, driveway access to the property would not be significantly impaired. See response to DH-2 regarding impact avoidance.

DH-4 Comment: *"I'd like to suggest that the bridge design be shifted to locate it further to the East utilizing more of the vacant land on the East side of Roberts Street. This will eliminate the need to adversely impact the property here at 398 Silver Lane. An additional concern is the drawing showing a V-shaped parcel between the "in" and "out-bound" sections of the bridge. I suggest that this will be a breeding ground for garbage and homeless individuals and should not be designed in such a way as to welcome any occupancy."*

DH-4 Response: See response to DH-5.

DH-5 Comment: "*If a bridge solution is the final recommendation, I would request that a design that uses pedestals (like the HOV bridges behind the property) rather than solid wall-type construction be used. This will retain the benefit (view) of some of the sunrise when looking out the East side of our home. It will also diminish the footprint needed to build the bridge and may aide in the transition from the current intersection and the end state."*

DH-5 Response: These issues will need to be addressed during the design phase of the roadway improvements. The design team should take your concerns into account when designing the bridge. However, due to the close proximity of the I-84 eastbound exit ramp at Roberts Street and Silver Lane, it does not appear that a significant amount of open area can be obtained. Also, due to the elevation and depth of the structure near the house along with the overall width of the structure, it is doubtful that any viewing benefit towards the east from the house can be achieved. Mr. Hahn's observation in comment DH-4 – "I suggest that this will be a breeding ground for garbage and homeless individuals and should not be designed in such a way as to welcome any occupancy." might also apply to placing the bridge on piers as he suggests.

DH-6 Comment: *"The actual bridge construction phase of this effort is of grave concern to me. My home is 125 years old with lathe and plaster walls and ceilings and a stone foundation. When previous construction has occurred at this intersection, we have encountered plaster damage as well as foundation compromise from the severe ground shaking that occurs from the equipment used. I did not see any mitigation plan to either identify this risk or identify it when it happens, let alone mediation after the fact. The state should provide a pre and post inspection and the financial support needed should damage occur and include this in the final plan."*

DH-6 Response: The potential vibration impact of construction will be evaluated during the design phase of the project. First, the vibration levels for the property will be predicted based on the project design, construction technique and detailed geologic information. Second, a preconstruction survey of the property will be made to determine existing wall and foundation cracks. Third, the construction activity will be monitored inside and outside the house to determine if impacts occur. If impacts are observed, then mitigation will take place. This may include an alteration of construction techniques. These measures will be spelled out in the construction specification documents.

DH-7 Comment: *"Figure 2.1.3-1 indicates two new intersections in and out of the site from Silver Lane. I am opposed to this approach and would like you to consider that retention of the existing intersection be in the final design. Moving a light directly in front of our property would degrade the existing view from our home and adversely impact our historic property. I'm sure people down near Clement Road (like Mrs. Rice) have the same concern. Please address the need to retain the existing intersection. This proposal does not support the need for local traffic to come and go from the site or to go North Onto Roberts Street or to 1-84 from Silver Lane. A lot of local traffic comes and goes from Silver Lane to both Airport Road and Roberts Street. Somehow the existing intersection needs to retain those support services."*

DH-7 Response: See the responses to DH-1, DH-4, DH-5, DH-6 and the following:

The proposed roadway network does permit full access from Silver Lane to Roberts Street as well as the Rentschler site. Airport Drive will be closed at its north end and will serve as an access roadway from Willow Street to the UTRC building. Access to Willow Street will be made from East Hartford Boulevard North under the proposed new roadway network.

DH-8 Comment: *"The Southeast corner of the intersection has plenty of open land that should be better utilized in the solution to overcome these noted concerns. There is no need to inject two or three new intersections on Silver Lane."*

DH-8 Response: See the responses to DH-1, DH-4, DH-5, DH-6.

DH-9 Comment: *"Page 3-91 shows a picture (photo 3.1.8-5) labeled "Silver Lane at Roberts Street". I'm not sure of the purpose of this picture, but it is not what it is a picture of. It is at least 700 feet West of Roberts Street. An actual picture of this intersection should be used or the description should be corrected."*

DH-9 Response: This is a photograph taken approximately 800 feet west of the Roberts Street/Silver Lane intersection looking east at the intersection. The purpose of this photo is to show existing land uses in this area.

DH-10 Comment: *"Page 3-21 addresses the sound impact. Specifically how the estimated sound levels would raise to .2 db above acceptable limits. It's concerning to me that the study discounts this fact and ignores any mention of mitigation for our specific property impact. Sound levels are a concern to me and I want to know what can be done to mitigate this issue."*

DH-10 Response: Noise on the property emanates from several sources including Roberts Street, Silver Lane and I-84. Noise barriers along Silver Lane are infeasible because access needs to be maintained to/from residences and commercial buildings. However, providing a noise barrier for the Roberts Street flyover is feasible, but such a feature may not provide an overall significant reduction in noise because there are other contributing noise sources. Nevertheless, more detailed noise modeling will be conducted during the design phase of the project to determine the effectiveness of a noise barrier for the flyover. Typically, and in accordance with FHWA criteria, a 7 dbA reduction is the minimum level of attenuation needed to justify noise mitigation measures.

Permitting/Review Agency - East Hartford Engineering Department, Connecticut Department of Transportation

DH-11 Comment: *"I hope there will he an opportunity to understand and approve of any final design and that this input can influence where that design will end up."*

DH-11 Response: There will be additional opportunity for public comment during the design phase of the roadway improvements. Notification at Town Hall and in the local newspaper will be made prior to scheduled public meetings.

Janet Rice (JR)
Telephone comment to Peter Simmons

JR(A)-1 Comment: The following is an excerpt of an email sent by Peter Simmons (DECD) to Steve Lecco (BEC) and Steve Ulman (Purcell Associates)

"I just spoke with Mrs Janet Rice (568-4114) of 470 Silver Lane (across from the Mobile Station). She would like to know where the State ROW for Silver Lane is in front of her house. What information do we have that could better clarify the potential impact to her property. She referenced, specifically, the statement on pg 3-193: "At a minimum, front lawns and walkways will be encroached upon and some businesses may lose the use of front parking spaces." Obviously, she would like to know how much land she could lose, how much closer will her house be to the road and how many lanes are proposed in front of her house."

JR(A)-1 Response: The response to Ms. Rice's comments are contained in a November 3 letter from Mr. Peter Simmons, DECD, as shown in Attachment A.

November 20 Letter

JR(B)-1 Comment: *"Please keep me informed of the DECD Record of Decision related to 470 on the north side of Silver Lane"*

JR(B)-1 Response: Ms. Rice will be informed when the Record of Decision has been submitted to OPM. The ROD will be made available at the Raymond Library and the Town Clerk's office in East Hartford. There will be additional opportunities for comment during the design and permitting phase of the project.

Unknown Commentor (UK)
undated Comment Form

The concerns expressed in this comment letter have been addressed in the EIE and this Record of Decision document.

Nola Moore (NM)
10/18/06 Comment Form

NM-1 Comment: The following is an excerpt from an email from Peter Simmons (DECD) to Steve Lecco (BEC) and Steve Ulman (Purcell Associates) on October 18, 2006.

"Ms. Nola Moore … of 262 Silver Lane is concerned that the road is already too close to her house, and that any widening would worsen the situation. AS with the prior message [regarding 470 Silver Lane],

please determine what additional material that we have that will provide more clarity to the anticipated actions"

NM-1 Response: The following is taken *verbatim* from an email from Steve Lecco (BEC) to Peter Simmons (DECD) in response to Ms. Moore's comment. See Attachment 1.

"We took a look at the existing mapping in the areas of 470 and 260/262 Silver Lane. In communicating with these residents, please convey that the EIE figures are conceptual and, therefore, property impacts are estimated. Final design will address, more specifically, ways of avoiding or minimizing impacts to properties. Things such as horizontal control and ROW width requirements (and how they can be done in a context sensitive manner) will be looked at in great detail during the design phase. The EIE merely identifies the properties that could POTENTIALLY be affected and the order of magnitude of these impacts.

The ROW width for Silver Lane at 470 Silver Lane is 66 feet. The cross sectional width of a standard 4-lane arterial could be as wide as 74 feet with optimal lane and shoulder widths, snow shelves and sidewalks. However, this can be reduced. Currently the road is 4 lanes wide, but the lanes are only 11' wide with no shoulders. At the most, widening would encroach 8' onto the property, but a context sensitive design could be constructed entirely within the ROW at this location. Note: the 24" maple tree in that front yard is entirely within the DOT ROW. The 36" maple is on the ROW line.

The ROW width for Silver Lane at 260/262 Silver Lane (a two-family house) is 53-55' (according to very old ROW mapping). At this location, the road is 3 lanes but needs to be 4. The front porch is approximately 10' from the existing road. An extra lane (11 or 12'), if divided evenly on the north and south sides of the road would cause the road to be 5' from the porch. At this time we do not know which side of the street (either or both) would be widened.

We have identified this property as one whose functionality could be impacted. Mitigation could include moving the house back on the lot. "

Permitting/Review Agency - East Hartford Engineering Department, Connecticut Department of Transportation

NM-2 Comment: *"My house is one of the four houses next to Taco Bell. If that section is widened, the third lane would be on my porch and the forth lane in the living room. That's how close to the main road. I worked three jobs to save and acquire this property. It's my only income after my retirement in 2004."*

NM-2 Response: See response to NM-1.

Robert Dexter (RD)
10/14/06 Letter

RD(A)-1 Comment: *"The graphic board plans as displayed in the East Hartford Town Council Chamber on Thursday November 9, 2006 at 6:30 pm, and the program outline as presented showed no alternate means of transportation for either bicycling or walking. The entire Silver Lane, Roberts Road area shown is a critical link of the East Coast Greenway Alliance. The East Coast Greenway (ECG) mission is 'To partner with local, state and national agencies and organizations to promote the establishment, stewardship and public enjoyment of a traffic-free multi-user trail linking cities from Maine to Florida.' The current open gap would link Forbes Ave in East Hartford (part of the ECG) to Pitkin Street spanning the Founders Bridge. This would also link to Riverfront Recapture, the Hartford/East Hartford 2*

mile existing trail. The ECG plan is to link its 284 separate segments together to total 2,946 miles of trail. The ECG office is located at 27 North Road, Wakefield RI 02879. Karen M. Votava is the Executive Director, infogreenway.org her phone is 401-789-4625. Bill O'Neil is the ECG Connecticut state committee chair billoneillgreenways@cox.net his phone is 860 647-1611. Please contact them for further information and coordination."

RD(A)-1 Response: Karen Votava and Bill O'Neill of the East Coast Greenway (ECD) were contacted. The conversations involved an exchange of information that provided further clarity for both the ECG members and DECD. The proposed Charter Oak Greenway through Rentschler Field has been noted by ECG in its Gap Study as a critical link in the ECG in the northeastern United States.

Also, see response to CEQ-5.

RD(A)-2 Comment: *"Noting that a magnet school is one of the options for a portion of the Rentschler Field Development area, bicycle paths in this area would fit right in with that intended use."*

RD(A)-2 Response: The access drive to the proposed East Hartford-Glastonbury Elementary Magnet School has been designed to a conceptual level. The Town of East Hartford will be issuing a contract for final design. During the design phase, the feasibility of providing a safe path for bicycles and pedestrians will be examined.

11/09/06 Oral Comments at Public Hearing

RD(B)-1 Comment: *"I don't see anything on the maps [showing the Charter Oak Greenway]. And I did see in the presentation a mention of cars, birds, turtles, wetlands, but nothing with bicycles or even kids."*

RD(B)-1 Response: See response to CEQ-5.

RD(B)-2 Comment: *"Schools need safe bicycle paths. And I hope that you will incorporate all this into the program just because its upsetting that there is nothing shown there now."*

RD(B)-2 Response: See response to RD(A)-2.

William Thompson (WT)
11//16/06 Email

WT-1 Comment: "*Please include bike lanes at the new construction project at Silver/Roberts lane. I've been commuting to work almost every day since July 1st and really enjoy it although we have a long way to go to catch up to more progressive communities, not to mention many countries around the world, that have incorporated bike/multi-use trails into their transportation network."*

WT-1 Response: During the design phase, the feasibility of providing adequate roadway shoulders for vehicular and bicycle safety will be explored, however The provision of bicycle lanes along Silver Lane would result in additional property impacts above and beyond the impacts associated with the proposed roadway improvements reported in the EIE.

The linkage of the Charter Oak Greenway between Willow Street and Simmons Road through the Rentschler Field site offers the most feasible and safe alternative for bicycling in this area.

Central Connecticut Bicycle Alliance (CCBA)
11/17/06 Letter

CCBA-1 Comment: *"The Central Connecticut Bicycle Alliance (CCBA) recommends road designs that accommodate multi-modal transportation. Incorporation of dedicated bicycle lanes, raised pedestrian crossings, smart traffic signals (that pick up cyclists), and various proven multi-modal design methods. "Share the Road" and "Pedestrian Crossing Signage" should be utilized throughout. Pedestrian and multi-use path "flyovers" should be considered on extremely busy streets and intersections. Popular cyclist arterial routes too narrow for dedicated bicycle lanes should utilize 'Sharrows' and signage as discussed in this FAQ on their use in San Francisco (http://www.bicycle.sfgov.org/site/dptbike index.asp?id=28372)."*

CCBA-1 Response: During the final design stage of the project, The suggested methods of achieving multi-modal traffic around Rentschler Field will be considered during the design phase of the project. The use of dedicated bicycle lanes, however, may not be feasible, particularly along Silver Lane, due to property impacts. Nevertheless, these will be considered. Other ways of accommodating pedestrian and bicycle traffic will be investigated.

CCBA-2 Comment: *"This development of Rentschler Field provides an opportunity to build more than a series of big box stores with parking lots or "suburbs on steroids." This opportunity should be used to help shape a sustainable, walk- able, bike-able community and commerce center. Utilization of bicycle and pedestrian friendly designs promotes non-vehicular access of the property and businesses — cutting down on peak parking needs and everyday environmental impact created by vehicular traffic."*

CCBA-2 Response: The Matos Group's vision for the Rentschler Field property incorporates a sustainable community where bicyclists, pedestrians and vehicular traffic can safely co-exist in a relatively dense urban setting. Specific plans for implementing this vision will be implemented as individual development projects are conceived. Nevertheless, with the Cabela's retail development, a 130-acre preservation area, and a future Charter Oak Greenway connection within and through the site, there is ample opportunity for providing passive recreational opportunities in a sustainable environment. Furthermore, there is a planned station on the south side of Silver Lane, near Simmons Road for a potential future station for the Hartford East Busway.

Also, see response to CEQ-5.

CCBA-3 Comment: *"The Matos Company developing the Rentschler Field property has an extensive network of multi-use trails planned throughout the site. The State of CT, Town of East Hartford, Pratt & Whitney, and CT DOT need to ensure that the access routes from the nearby neighborhoods, roads, and multi-use paths, and bus-stops are bicycle and pedestrian friendly. Otherwise the Matos planning is for naught and the multi-use trails will be under-utilized due to isolation."*

CCBA-3 Response: See response to CCBA-2.

CCBA-4 Comment: *"Connection of the Charter Oak Greenway multi-use path to Great River Park is an important connection for f both recreational and transportation reasons. This connection requires cooperation of the DOT, Town of East Hartford, Pratt & Whitney, and private property owners.*

From communications with those various parties, this coordination and planning is not taking place. It should be noted, however, that completion of this multi- use path will not eliminate the need for roadway design that safely and efficiently accommodates bicyclists and pedestrians. All the roads being modified as part of this project should be viewed as opportunities for improvements to bicycle and pedestrian safety."

CCBA-4 Response: See response to CEQ-5, WT-1 and CCBA-1.

CCBA-5 Comment: *"The CCBA would also like to recommend that the DECD work with the Capitol Region Capitol of Governments (CRCOG) regional transportation planning organization and the CT Department of Transportation Bicycle and Pedestrian Committee to ensure that the new and modified roads are suitable for multi-modal transportation."*

CCBA-5 Response: DECD and the Town of East Hartford has, and will continue to, work with CRCOG and DOT regarding means of providing multi-modal transportation in and around Rentschler Field. A meeting was held on December 7, 2006 to coordinate the proposed Charter Oak Greenway plans through the development site.

CCBA-6 Comment: *Roberts Street/Silver Lane Comment: "Grade separation will remove this large intersection from Silver Lane's general flow. The CCBA is interested in how bicycle and pedestrian access at this major entrance to the P&W site will be integrated into the design and improved."*

CCBA-6 Response: Pedestrian / bicycle access to the site from Silver Lane will be evaluated in greater detail during the design phase of the project. The new Roberts Street Extension / Silver Lane intersection is the most logical choice, however, the one-way roadways from East Hartford Boulevard North to Silver Lane could also be used. While we agree that pedestrian/bicycle access from Silver Lane to the Rentschler Field development should be considered, these efforts must be weighed against the property impacts that are likely to occur as a result of the transportation improvements.

CCBA-7 Comment: *Brewer/Main/High Street Comment: "This portion of planned work includes a significant amount of 'new' pavement without width issues that often occur with work on existing roadways. Have dedicated bike lanes been considered on these new designs? Pedestrian friendly features would develop the existing commercial district – will they be included?"*

CCBA-7 Response: See response to CEQ-5, WT-1 and CCBA-1.

CCBA-8 Comment: *Main Street / Willow Street Comment: "This intersection would be critical for the extension for the Charter Oak Greenway. Is that built into the plan? What is the status of the extension of the Charter Oak Greenway? How will the Greenway and the Rt. 2 entrance ramp configuration work? This intersection is also an important pedestrian and cyclist access point to the P&W facility. How are bike / ped issues included in the design of the intersection?"*

CCBA-8 Response: See response to CEQ-5.

CCBA-9 Comment: *Silver Lane Comment: "The CCBA recommends widening Silver Lane and utilizing dedicated bike lanes. This is a popular route for bicycle commuters from Manchester, Vernon, East Hartford, and Parts of Glastonbury to the P&W Facility and Downtown Hartford. The recent*

re-surfacing of Silver Lane generated a strong response from the concerned citizens and bicycle commuters. Connecting the Charter Oak Greenway through P&W and on to Great River Park could reduce the bicycle commuter use of Silver Lane. It should be noted, however, that completion of this multi-use path will not eliminate the need for roadway design that safely and efficiently accommodates bicyclists and pedestrians.

How will the Charter Oak Greenway extension cross Silver Lane? A multi-use path I pedestrian flyover at the very busy intersection on Silver Lane / Simmons Road that accesses the stadium should be considered. This flyover would allow access from the cross street parking planned at the P&W Aircraft Club during stadium events. It would also allow for everyday bike I ped access to the Rentschler development and park land via the multi-use path."

CCBA-9 Response: See response to CEQ-5, WT-1 and CCBA-1 regarding Charter Oak Greenway issues.

A pedestrian bridge over Silver Lane has been considered to provide safe pedestrian access from the Pratt & Whitney Aircraft Club Softball Complex, one of the proposed future parking areas for Stadium Events (see Figure 4). At a minimum, there will need to be a pedestrian crosswalk and police protection for those pedestrians. The Office of Policy and Management may evaluate the need, cost/benefit and feasibility of a walkway in the near future if pedestrian safety conditions warrant such an evaluation..

CCBA-10 Comment: *EHGEMS Comment: "The CCBA recommends bicycle lanes and pedestrian consideration on any roads built to access the new magnet school. These roads will not have firm width constraints and should be able to accommodate ideal configurations for multi-modal transportation. This site would be ideal for a Safe Routes to School traffic study and funding."*

CCBA-10 Response: See response to RD-2.

CCBA-11 Comment: *Connecting the Charter Oak Greenway through P&W and on to Great River Park could reduce the bicycle commuter use of Silver Lane. It should be noted, however, that completion of this multi-use path will, not eliminate the need for roadway design that safely and efficiently accommodates bicyclists and pedestrians.*

This connection will also serve as a valuable spoke for bicycle commuters from East Hartford, Manchester, Vernon, and parts of Glastonbury that work at P&W or in downtown Hartford.

There are a lot of parties that need to cooperate to make this connection, and it doesn't appear that the coordination is taking place."

CCBA-11 Response: See response to CEQ-5, WT-1 and CCBA-1.

Jessica Foster (JF)
10/17/06 Letter

JF-1 Comment: *"I have one question, although you may not be able to answer it…Will there be a possibility to change the property zoning from Residential to Commercial? Much of the street is already commercial, and it seems with the plans for Rentschler Field, it could be a good area for a business. This house is certainly large enough for a business downstairs while I lived upstairs. And of course, since this is a double lot, it would be worth far more as commercial."*

JF-1 Response: There are currently no plans to change the zoning along Silver Lane in the vicinity of Rentschler Field.

Hartford Audubon Society (HAS)
11/16/06 Letter

HAS-1 Comment: *"The proposed "Cabelas" retail complex will destroy the most viable habitat currently available to these species in central Connecticut. Under state law this habitat loss must be mitigated. Since state funds are being invested in the Rentschler Field development, it is critical that the state assures that adequate mitigation is undertaken to compensate for this major habitat loss. The mitigation plan as described in the EIE lacks the specificity and assurances we are looking for. We are not confident that the damage done by this development will be adequately mitigated."*

HAS-1 Response: See responses to CEQ-2 and CEQ-3The proposed Cabela's development would occur within a portion of the grassland habitat of Rentschler Field, however, the overall population of grassland birds will be sustainable, even with this development in place. The mitigation for the Cabela's development consisted in part of clearing large areas of dense successional shrubs to provide primary grassland habitat to offsets the primary habitat impacted by the Cabela's development. A DEP survey of the area in the summer of 2006 showed that on-site mitigation was successful, with increased usage of the cleared areas by grassland birds. See pages 3-173 through 3-175 in the EIE.

The reviewer may be intending to reference the later phases of development, which would encompass all of the grassland habitat on-site. The agreements to be implemented with DEP will have the ability to ensure successful implementation of mitigation of the lost grassland habitat areas, and continued viability of grassland habitat into the foreseeable future.

HAS-2 Comment: *"The plan does not commit to a minimum size for a mitigation area, nor does it commit to the 3 to I ratio that was in practice in previous Rentschler Field development. The plan calls for obtaining multiple parcels of land, stating that large enough contiguous property is not available This is not acceptable, because grassland species require a large space in order to breed and find adequate food and water. To increase success of the mitigation, all possible efforts should be made to obtain the largest properties possible."*

HAS-2 Response: The goal of the off-site mitigation plan is to provide the necessary habitat to support a population of grassland birds that currently occupies Rentschler Field. The acreage of the mitigation sites is an important factor, but not the only one, in achieving the mitigation goals. Other factors include: current avian species use, shape, vegetation, terrain, connectivity, wetness, potential for predation and potential for disturbance by the public. These are all discussed in Section 3.2.7 of the EIE. These suitability factors will be evaluated for each potential mitigation site to determine the area requirements needed to mitigate the long term impacts of the Rentschler Field development. The EIE for the Stadium did not specify a mitigation ratio for the 75-acre Stadium impact, however a minimum size criteria of 150 acres was set for identifying potential sites. This is the amount of open area that is generally required to initially attract grasshopper sparrows as a prelude to nesting and foraging. The site selected to mitigate the impact associated with the previous development project (football stadium) was a vacant portion of the very large Enfield-Somers Correctional Facility complex, owned by the State of Connecticut. The area deemed to be potentially suitable grassland bird habitat was approximately 220 acres in size**.** The 3:1 mitigation ratio was an artifact of the amount of land available for the project, not a pre-set mitigation goal, which by necessity must be determined on a case-by-case basis in accordance with the criteria mentioned above.

To date DEP has signed a contract to purchase a site in the Connecticut River flyway that is approximately 165 acres in size. The habitat quality of this area is high and nesting by grasshopper sparrows and other grassland birds -has been documented at this site. Securing this site would satisfactorily mitigate the anticipated loss of grassland habitat at Rentschler Field associated with Phase I of the development. Habitat management will enhance the nesting potential atthe mitigation site.

DEP is also pursuing the purchase of other larger sites in the flyway that would mitigate future phases of development at Rentschler Field. As stated in the EIE, the upland sandpiper generally requires a larger area, approximately 250 - 350 acres, therefore another site(s) would need to be acquired to fulfill mitigation requirements.

HAS-3 Comment: *"The mitigation sites need to be managed and surveyed properly. We recommend that as a starting point, the performance of the current mitigation site purchased to compensate for the football stadium be evaluated. Hartford Audubon would like to be informed of the results of this evaluation."*

HAS-3 Response: DEP will manage and monitor the mitigation sites to determine their success in achieving the mitigation goals for this project. A plan including provisions for maintenance, monitoring, and adaptive management will be developed for each site in order to rectify any potential deficiencies or problems with the mitigation sites. These plans will be specific to each site.

Monitoring at the Stadium mitigation site (Enfield-Somers Correctional Facility Complex), has been, and will continue to be undertaken on an annual basis by DEP. To date, the site has been successful in attracting grassland birds. However, the target species, grasshopper sparrow, has not yet been observed at the site. The presence of grasshopper sparrow at this site is expected when displacement of these birds occurs at Rentschler Field. Monitoring data since the Stadium was constructed has shown a consistent and sustainable nesting population of grasshopper sparrows and upland sandpipers at Rentschler Field.. When additional development occurs at Rentschler Field, the population of the grassland birds will eventually exceed the threshold for displacement and these birds will seek more desirable and suitable habitat in the CT River flyway. DEP is focusing its efforts on acquiring properties where grasshopper sparrows have been documented, thereby increasing the potential that the target bird species will colonize the mitigation sites.

HAS-4 Comment: *"If this mitigation site does not have documented nesting grassland species, then we know that extra care needs to be taken in selection and management of new properties. Failure of the football stadium mitigation would mandate that land be purchased to mitigate the loss of habitat from the football stadium in addition to the land for the Cabela's complex."*

HAS-4 Response: The Stadium project is a separate and distinct project from the proposed Rentschler Field Development. Nevertheless, the information gained from the Stadium mitigation project has, and will continued to be used in the site identification and management process for mitigation sites associated with the proposed project. As stated in the response to HAS-3, DEP has focused its off-site acquisition efforts on sites where grasshopper sparrows and other grassland birds have been documented.

.

Audubon Connecticut (AC)
11/17/06 Letter

AC(A)-1 Comment: *"One additional state - endangered species, Northern Harrier, has been recorded in the nesting season so the site should also be considered potential nesting habitat for this species."*

AC(A)-1 Response: The Northern Harrier has not been observed at Rentschler Field since 2000 despite annual bird surveys at appropriate times which have included close observation for possible nesting. Since this species has not been observed since 2000, the potential for Northern Harrier nesting at Rentschler Field is low.

AC(A)-2 Comment: *"Audubon Connecticut submitted detailed suggestions regarding the specifics of mitigation as part of the pre-scoping process in August of 2005. These comments were unfortunately never received by the Department of Economic and Community Development, so were not reflected in this draft of the EIE. Our original comments are attached to this testimony. We strongly recommend that these be incorporated into the final EIE."*

AC(A)-2 Response: Unfortunately, the August, 2005 comments were never received by DECD. These comments, however, have been reviewed as EIE comments and responses have been provided in this document.

AC(A)-3 Comment: *"The details of the mitigation plan should be spelled out in the final EIE including:*

- *Who is responsible for developing the mitigation plan.*
- *Who is responsible for implementing the mitigation plan.*
- *Were the funding will come from for implementation. In particular, the developer's financial commitment towards the mitigation efforts should be clearly spelled out in the final EIE.*
- *Minimum standards to ensure that mitigation is successful. While we understand that the Technical Advisory panel of the new state Grasslands Council will oversee the specifics, there must be clear language in the final EIE establishing a minimum standard of successful mitigation against the loss of this natural resource."*

AC(A)-3 Response: Funding sources and the party responsible for developing and implementing the mitigation plan and are identified in the response to CEQ-2, CEQ-3, HAS-2, and HAS-3. To reiterate, the goal of the mitigation plan is to replace all grassland bird habitat lost as a result of the proposed project. This goal can be easily monitored. When grassland birds are displaced from Rentschler Field the likelihood is high that these species will find and utilize the mitigation site (see response to HAS-3). Due to the uncertainty in timing for subsequent phases of the development, it is difficult to predict when grassland birds will colonize the mitigation sites in large numbers.

AC(A)-4 Comment: *"Pre-construction studies at Rentschler Field to establish the baseline data necessary to facilitate post- construction review of the success of mitigation efforts, including:*

- *Detailed habitat assessment to determine exactly what aspects of the Rentschler Field habitat are being utilized and what makes this particular site so important for grassland birds. This should include at least one summer of nest monitoring at Rentschler Field in advance of development.*
- *Color banding of birds currently using Rentschler Field to determine their movements after their existing habitat is compromised. This would help in post mitigation monitoring to determine whether the birds do, in fact, adapt to alternative habitats whether in the mitigation areas or at other existing grassland sites in the state.*
- *An explicit description of what monitoring is going to occur at mitigation/restoration sites at specific timeframes in order to determine whether the mitigation effort has been successful.*
- *Who will monitor the success of mitigation efforts or lack thereof.*
- *What steps will be taken if the proposed mitigation fails to meet the stated objectives and who is responsible for those steps."*

AC(A)-4 Response: In addition to annual breeding season surveys, more detailed information on nesting activity has been conducted at Rentschler Field in previous years. As private property, permission for any and all research activity, including color banding of individual birds, is required from the landowner. DEP will continue to pursue study of the site in order to assess the status of the on-site mitigation success and obtain information on the movement of grassland birds as they are displaced from Rentschler Field.

DEP will be responsible for monitoring the success of the long term mitigation sites as well as implementing adaptive management plans for each site. See responses to CEQ-2, CEQ-3 and HAS-2 for more information on off site mitigation responsibilities.

AC(A)-5 Comment: *"In October of 2006, the State of Connecticut announced an innovative Grasslands Initiative largely in response to the proposed development of Rentschler Field, and which we understand will constitute the bulk of the mitigation for Rentschler Field. If that is the case, this statewide Grasslands Initiative should be specifically referenced in the final EIE, and the EIE should indicate how this initiative answers the questions posed above."*

AC(A)-5 Response: The Grassland Habitat Conservation Initiative is a comprehensive, statewide program with the goal of preserving grassland habitat in Connecticut. The off-site mitigation for impacts at Rentschler Field would necessarily occur with or without this Initiative in place. The Rentschler Field project highlighted the need for conserving grassland habitat in the State.

Audubon Connecticut (AC)
8/17/05 Letter

This was originally intended as a public scoping comment, but was never received by DECD. Therefore, it is included, as requested by Audubon Connecticut, as an EIE comment letter.

AC(B)-1 Comment: "*Independent review of mitigation plan: "The mitigation portion of the EIE is a critical component of this document and as such and to ensure maximum success,provisions should be made for review of the mitigation plan by recognized grassland bird experts not affiliated with or paid by the developer, the Office of Policy and Management, Department of Economic and Community Development or Baystate Environmental Consultants. The mitigation plan should also be reviewed and approved by the Department of Environmental Protection Wildlife Division."*

AC(B)-1 Response: The grassland bird mitigation plan contained in the EIE was prepared by Baystate Environmental Consultants under contract to the DECD. The DEP Wildlife Division reviewed the

mitigation plan and provided input for the EIE. The mitigation plan satisfies all the requirements specified by DEP.

AC(B)-2 Comment: *"Review of success of mitigation for previous development on the site: "A review should be undertaken of the completed mitigation project for previous development at the site (UCONN Stadium at Rentschler Field) and whether or not that mitigation was successful for the intended species. If the mitigation has not been successful, attempts should be made to avoid the pitfalls that may have hindered the success of this past mitigation attempt."*

AC(B)-2 Response: See response to HAS-3.

AC(B)-3 Comment: "*Comprehensive studies of the Rentschler Field site: "Baseline inventory and monitoring on-site, including comprehensive vegetative, hydrological and soil studies to best understand what makes Rentschler such a good habitat for grassland birds will greatly aid in attempts to replicate a successful grassland habitat at another site."*

AC(B)-3 Response: A description of the habitat at Rentschler Field is provided in the EIE. This includes information on vegetation, soils and other physical characteristics. These parameters and others as described in pages 177-179 of the EIE, were used in the search and selection of long-term mitigation sites in the CT River flyway. Preference was given to sites that already contain grassland birds, thereby increasing the success of the off-site mitigationA description of the habitat at Rentschler Field is provided in the EIE

AC(B)-4 Comment: "*Monitoring of Mitigation success. "Monitoring of the mitigation site for the current project to gauge mitigation success and adapting management techniques to correct any problems that might prevent successful mitigation. This will ensure the highest possible success of the mitigation efforts."*

AC(B)-4 Response: See response to HAS-3 and HAS-4.

AC(B)-5 Comment: "*Area of mitigation provided: "Continue the precedent set by the mitigation efforts for the University of Connecticut football stadium at Rentschler Field, by maintaining at least a 3:1 ratio of new grassland to grassland lost for any State-funded projects, or projects that require permits from the State, that destroy or degrade habitat for State-listed grassland species."*

AC(B)-5 Response: See response to HAS-2.

AC(B)-6 Comment: *"To achieve maximum probability of success, the areas selected for mitigation should:*

- *Occur at contiguous parcels that are of adequate size to support nesting by the species that are being mitigated for.*
- *Have similar soils, topography, and hydrology to the habitat that is beingmitigated for and provide similar vegetative structure. Selecting sites with similar soils to the habitat being developed will greatly increase the chances of mitigation success and allow for more efficient management of the habitats in the future. Many of the locations in Connecticut that currently support nesting by*

Grasshopper Sparrows occur on lands that were formerly used as shade-grown tobacco lands and inclusion of such lands in the mitigation plan would likely increase chances of success.

- *Be located as close as possible to Rentschler Field and within known or suspected flyways for grassland birds, i.e. the Central Connecticut Valley and proximal to known current or historical populations.*
- *Include protection and/or enhancement and management of some sites where at least some endangered grassland birds currently nest."*

AC(B)-6 Response: These suggestions have been considered in the EIE and are discussed as such on pages 3-177 through 3-181. Also see response to HAS-2.

AC(B)-7 Comment:

- *"**Protection**, areas selected as mitigation sites should be permanently protected through easement or ownership held by a government agency or established conservation organization.*
- ***Access**, public access to the mitigation habitat will help to raise awareness of grassland birds in Connecticut and enhance the wildlife viewing opportunities available to the public. Any access to the mitigation site should however be controlled in order to avoid incompatible uses at the site, such as ATV use, walking of dogs or other uses that wiLI interfere with the reproductive success of grassland birds at the site.*
- ***Shrubland habitat**, Since at least one of the state-listed bird species known to occur at this site requires a later successional stage than grassland habitat, provision of shrubland habitat and the resources for the management of such should be included in any mitigation plan."*

AC(B)-7 Response: These suggestions have been addressed in the EIE on pages 3-177 through 3-181. The first priority in developing grassland bird habitat is to provide high quality habitat for the target species. Public access to the mitigation sites is, at best, a secondary consideration that needs to be controlled, as stated in the comment The provision of shrubland at the mitigation site(s) will be considered, where feasible, in order to provide habitat for state-listed species that prefer this habitat. Also, see response to CEQ-2 regarding responsibility for site acquisition and management.
These suggestions have been addressed in the EIE on pages 3-177 through 3-181. Also, see response to CEQ-2 regarding responsibility for site acquisition and management

AC(B)-8 Comment:

- ***Contiguity**: The preliminary plans presented at the August 9, 2005 scoping meeting indicate that —20% of the remaining parcel will be preserved as open space. It is important that this remnant open space be provided as a contiguous swath of upland grassland habitat. Since grassland birds are area sensitive, the larger the contiguous area of grassland habitat that remains, the better the chances are that a population will remain and be reproductively successful.*
- ***Soils**, the sections of Rentschler Field selected as on-she mitigation areas should have appropriate soils for supporting the upland grassland habitat for the state- listed birds that currently nest there. Optimal habitat for the most endangered of these species is best supported by dry, xeric soil conditions. Pond/wetland habitats, while also in need of protection and/or mitigation, are not appropriate habitat for these grassland-nesting birds and should not be included in grassland mitigation acreage."*

AC(B)-8 Response: These suggestions have been addressed in the EIE on pages 3-177 through 3-181.

AC(B)-9 Comment: *"A copy of the report, which was slightly updated in 2003, is attached for your information."*

AC(B)-9 Response: This report was reviewed and pertinent information from it incorporated into the EIE.

Kevin Sullivan (KS)
11/09/06 Oral Comments at Public Hearing

KS-1: Comment: *"And I would simply like to ask you to consider in your design bicyclists, pedestrians, and other alternative forms of transportation and recreation"*

KS-1 Response: See response to DEP-27, DEP-28, CEQ-5, WT-1, CCBA-1, CCBA-2 and CCBA-5.

Patrick Cummings (PC)
11/09/06 Oral Comments at Public Hearing

PC-1 Comment: *"A few questions need to be assessed in the final EIE regarding a mitigation plan. And it needs to be expressly laid out in the plan who is responsible for developing the mitigation plan. Who is responsible for implementing that plan. Where the funding will come from for that implementation and, in particular, it needs to be noted the developer's financial commitment towards the mitigation efforts. That should be clearly spelled out. As I understand the developer will be contributing to that effort."*

PC-1 Response: In summary, DEP is responsible for acquisition and management of the mitigation sites. Financing of these efforts will be provided by a combination of State and private funding. See response to DEP-1, CEQ-2, CEQ-4 and HAS-3 for more details.

PC-2 Comment: "*It's also critical that minimum standards are set forth in the EIE to insure that the mitigation is successful. And we also need to make sure that we monitor the success of that mitigation and be adaptive in our management techniques and make sure that if it isn't working that there are significant resources in place in order to adapt and make sure that it is successful."*

PC-2 Response: See response to CEQ-3, HAS-2, HAS-3 and HAS-4.

Paul Kudra (PK)
11/09/06 Letter

PK-1 Comment: *"And I express a strong desire to, please, connect up dedicated bike paths that exist on the Charter Oak Greenway in Manchester with this as I know that I speak for several of my neighbors that also commute to work by bike."*

PK-2 Response: See responses to DEP-27, DEP-28, CEQ-5, WT-1, CCBA-1, CCBA-2 and CCBA-5.

Tony Cherolis (TC)
11/09/06 Oral Comments at Public Hearing

TC-1 Comment: *"This opportunity should be used to help shape sustainable, walkable, bikeable communities and a commerce center"*

TC-1 Response: See response to CEQ-5, WT-1, CCBA-2 and CCBA-5.

TC-2 Comment: *"…but from speaking to the parties involved the connection and cooperation needed to make that Charter Oak greenway connection has not been followed up on."*

TC-2 Response: See response to CEQ-5, CCBA-2 and CCBA-5.

TC-3 Comment: *"And my final recommendation would be that the planners work with Capitol Region Council of Governments and the CT Department of Transportation Bikeped Advisory Committee to incorporate good bikeped designs."*

TC-3 Response: See response to CEQ-5 and CCBA-5.

References

Roa-Espinosa, A., Wilson, T.B., Norman, J.M., Johnson, K. *Predicting the Impact of Urban Development on Stream Temperature Using a Thermal Urban Runoff Model (TURM)*. Dane County Land Conservation Department; Department of Soil Science, University of Wisconsin-Madison; Wisconsin Department of Natural Resources. http://www.epa.gov/owow/nps/natlstormwater03/31Roa.pdf; Accessed 12/04/06.

Dane County, WI. Thermal Impact Educational Material, Understanding Thermal Impact. http://www.co.dane.wi.us/landconservation/ecswpubspg.htm; Accessed 12/04/06.

Kieser, M.S., Feng Fang, A.; Spoelstra, J.A. Role of Urban Stormwater Best Management Practices in Temperature TMDLs. Kieser & Associates, Kalamazoo, MI. http://www.kieser-associates.com/TMDL03paper.pdf; Accessed 12/07/06.