

STATE OF CONNECTICUT  
DEPARTMENT OF HOUSING

ENVIRONMENTAL ASSESSMENT CHECKLIST

Project ID No: (issued by OPM)

Date: 7/12/17 Staff Contact: Jennifer Ponte  
Municipality: Pawcatuck Project Name: Spruce Ridge  
Funding Source: HOME State Funds:  
Type of State Agency Review Stage 1  X  Stage 2

**This assessment is being conducted in conformance to the department's Environmental Classification Document to determine CEPA obligations**

**Project Description:** The Department of Housing (DOH) is considering using HOME funds to assist in the development of the 43-unit Spruce Ridge project in Pawcatuck, located within the Town of Stonington. The project is being completed by a Community Housing Development Organization (CHDO) eligible developer that would provide DOH with an avenue for meeting both our CHDO and general HOME commitment and expenditure requirements. Spruce Ridge is the second phase of this development at this location (86-88 South Broad Street). Each phase is located on a separate legal parcel. The first phase (known as Spruce Meadows, also comprising 43 units) located at 100-102 South Broad Street was completed with 4% LIHTC and DOH state bond funding. Until this point in time, DOH did not contemplate using HOME funds for this project, but the lack of other CHDO eligible developments has made us reconsider the use of HOME funds. The first and second phases of this project are not related legally but they are being completed by the same parent organization and are located on adjacent parcels.

Note: environmental remediation is a positive environmental impact, but not a CEPA activity.

**RCSA sec. 22a-1a-3 Determination of environmental significance (direct/indirect)**

- 1) *Impact on air and water quality or on ambient noise levels*
  - a) *Air* — DEEP recommends that the DOH consider laying the foundation for electric vehicle supply equipment, to allow the units to have the capability of supporting electric vehicles in the future. A report by the Boston Consulting Group found that, assuming a steady growth rate, by 2020 18% of cars in city regions will be electric vehicles. Other studies have shown that builders who have incorporated EV ready designs into their new construction projects have resulted in increased marketability of their developments and have found it to be more cost-effective to include the costs in new construction versus retrofitting a completed project. More information can be found at DEEP's website: EVConnecticut. The contact person for this program is Jennifer Reilly at 860-424-3123.
  - b) *Water Quality* — Registration may be necessary under the General Permit for the Discharge of Domestic Sewage because Spruce Ridge will be in a sewer service area. Key to this determination is whether the complex will meet the definition of "Community Sewerage System." From the Domestic Sewage GP, "Community Sewerage System" means any sewerage system serving one or more residences in separate structures which is not connected to a municipal sewerage system or which is connected to a municipal sewerage system as a distinct and separately managed district or

segment of such system. The latter part of this definition, “which is connected to a municipal sewerage system as a distinct and separately managed district or segment of such system” will be the determining factor. The most common examples of this type of community system are condominium associations or home associations where the residents each do not pay a fee directly to a municipal sewer utility, but the condo or home association owns and maintains the sewer lines and sewer pump within the complex and the association pays a single annual fee to the municipal sewer utility. The prior project, Spruce Meadows, may also be required to register under the Domestic Sewage GP depending on the sewage system as described above. Should these projects meet the definition of “community sewerage system,” they would be required to register under the general permit. Before the General Permit Registration Form for the Discharge of Domestic Sewage could be approved a copy of the “community sewerage system agreement” (also defined in the Domestic Sewage GP) between the municipality and the association must be submitted. For questions on this program please call James Creighton at 860-424-3681, from the Water Permitting and Enforcement Division, Bureau of Materials Management and Compliance Assurance.

- c) *Noise*— No negative impacts are anticipated.
- 2) *Impact on a public water supply system or serious effects on groundwater, flooding, erosion, or sedimentation*
    - a) *Water Supply*— The Department of Public Health’s (DPH) Drinking Water Section (DWS) recommends that the proposed development implements measures that conserve the use of public drinking water. The EPA’s Water Sense Program and numerous voluntary green building standard model codes are available for references to assist designers in achieving sustainable developments. Links to these programs and more can be found on the DWS’s webpage dedicated to water conservation (<http://www.ct.gov/dph/cwp/view.asp?a=3139&q=387302>).
    - b) *Groundwater*- No negative impacts are anticipated.
    - c) *Flooding*— No negative impacts are anticipated.
  - 3) *Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows* — GIS mapping shows there is a possible wetland off of Long Meadow Lane in the proposed water main location. It is unknown whether the main will be installed with no direct wetland impacts. If there are any undeveloped areas within the project area, it is recommended that a certified soil scientist perform a reconnaissance of the site in order to determine whether there are any areas which would be regulated as wetlands or watercourses as defined by section 22a-38 (15) and (16) of the Connecticut General Statutes (CGS). If the reconnaissance identifies regulated areas, they should be clearly delineated. Any activity within federally regulated wetland areas or watercourses at the site may require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Further information is available on-line at Army Corps of Engineers, New England District or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. If a permit is required from the U.S. Army Corps of Engineers, a Water Quality Certificate will also be required from DEEP pursuant to section 401 of the Clean Water Act. For further information, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available on-line at 401 Certification.
  - 4) *Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings*— No negative impacts are anticipated.

- 5) *Effect on natural communities and upon critical species of animal or plant and their habitats: interference with the movement of any resident or migratory fish or wildlife species*— No negative impacts are anticipated.
- 6) *Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact*— No negative impacts are anticipated.
- 7) *Substantial aesthetic or visual effects*— No negative impacts are anticipated.
- 8) *Inconsistency with the written and/or mapped policies of the statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency* — Because this action involves improvement of real property in excess of \$200,000, it is subject to the consistency requirement of the State Conservation and Development Plan of 2013-2018 (Plan) and its Growth Management Principles (GMP). The project area is located within an area designated as Priority Funding Area on the 2013-2018 Conservation and Development Policies Plan. In particular, this type of project supports both GMP #2 (Expand Housing Opportunities and Design Choices to Accommodate a Variety of Household Types and Needs) by enhancing housing mobility and choice across income levels and promote vibrant, mixed-income neighborhoods through both ownership and rental opportunities. This action also supports local efforts to develop appropriate urban infill housing and neighborhood amenities to make better use of limited urban land. In addition, the Plan requires that those projects deemed Growth Related be located in a Priority Funding Area. This project has been determined to be a Growth Related Project as defined in the Plan and is located in a Priority Funding Area and is therefore consistent with the Plan.
- 9) *Disruption or division of an established community or inconsistency with adopted municipal or regional plans*— No negative impacts are anticipated.
- 10) *Displacement or addition of substantial numbers of people* — No negative impacts are anticipated.
- 11) *Substantial increase in congestion (traffic, recreational, other)* — No negative impacts are anticipated.
- 12) *A substantial increase in the type or rate of energy use as a direct or indirect result of the action*— No negative impacts are anticipated.
- 13) *The creation of a hazard to human health or safety* — When a new building located in a high potential zone for radon is to be constructed as part of the project plan, it should be built using radon resist features for occupied spaces at or near the ground level. Please refer to the attached DPH letter which describes the basic components of radon resistant features for new construction. The new building should be tested for radon after construction is completed.
- 14) *Any other substantial impact on natural, cultural, recreational or scenic resources*— No negative impacts are anticipated.

**Cumulative Impacts: None**

**Scoping Comments:** DOH received comments from DEEP, OPM and DPH.

Response to DPH comments: Your comments regarding radon will be forwarded to the applicant.

Response to OPM comments: The apparent segmentation issue resulted because DOH was unaware of the Spruce Ridge Project (phase 2) when it originally provided assistance for the Spruce Meadows Project. DOH agrees that the “purpose and need” of the project should be clearly stated for the proposed action.

Response to DEEP comments: Your comments regarding General Permit for the Discharge of Domestic Sewage, Inland Wetlands and Watercourses and future planning to reduce emissions will be forwarded to the applicant.

The following factors including the comments received by DOH helped determine that there is no obligation under CEPA for an Environmental Impact Evaluation:

- Number of bed rooms proposed
- Availability of public water and sewer at the site
- Local Town of Stonington Inland Wetlands and Planning and Zoning approvals
- TOD type project - Proximity to two Amtrak stations; Site being served by South East Area Transit

**Recommendations:** The EA for this project appears not to trigger an obligation under CEPA for an EIE.