



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

October 26, 2022

Keith Ainsworth  
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Paul Aresta  
*Executive Director*

Dennis J. McDonald  
Supervising Property Agent  
Connecticut Department of Transportation, Division of Rights of Way  
2800 Berlin Turnpike, Newington, CT, 06113  
Dennis.McDonald@ct.gov

Re: Proposed land transfer - 125 Waterford Parkway North in Waterford

Dear Mr. McDonald

The Council on Environmental Quality (“Council”) notes that the Department of Transportation is proposing to transfer an approximately 25-acre parcel located at 125 Waterford Parkway North in Waterford. The parcel is identified as undeveloped wooded land with ponds, streams, other water, or wetlands. In addition, the parcel is identified as containing or being within a 100-year flood zone and is subject to a Flood Management Certificate from the Connecticut Department of Energy and Environmental Protection (DEEP). The Council’s review of the parcel using DEEP’s spatial screening data confirms this information and indicates that the parcel is also located within an area designated as forestland habitat, which consists of prime continuous and connected core forestland blocks. Furthermore, the parcel appears to also contain a Natural Diversity Database (NDDDB) buffer area, which indicates the possible presence of state-listed species.

Connecticut General Statutes (CGS) Section 26-310.(Actions by state agencies which affect endangered or threatened species or species of special concern or essential habitats of such species) states that “(a) each state agency, in consultation with the commissioner, shall conserve endangered and threatened species and their essential habitats, and shall ensure that any action authorized, funded or performed by such agency does not threaten the continued existence of any endangered or threatened species or result in the destruction or adverse modification of habitat designated as essential to such species, unless such agency has been granted an exemption as provided in subsection (c) of this section.” In addition, CGS Section 23-8(b) establishes a goal of “twenty-one per cent of the state’s land area shall be held as open space land.”

Given the state’s goals to protect core forest and state-listed species and preserve open space land, the Council recommends that the state reconsider the appropriateness of transferring this parcel out of state ownership as it appears to run counter to Connecticut’s open space goals and the interests of natural resources, habitats and

state-listed species. Should the state decide not to retain the parcel as open space, the Council strongly recommends including restrictions on the future use of the parcel that would a) retain the undeveloped nature of the parcel and b) protect state-listed species.

The Council notes that there is an approximately 169-acre parcel, owned by the state, that directly abuts the parcel described above. Should the state retain the parcel as preserved open space, the aggregated acreage would provide even greater benefits, especially when assessing core forest blocks.

Thank you for your consideration of the Council's comments.

Sincerely,

A handwritten signature in cursive script that reads "Paul Aresta".

Paul Aresta  
Executive Director

c. Jeffrey Beckham, Connecticut OPM  
Graham Stevens, Connecticut DEEP