



# COUNCIL ON ENVIRONMENTAL QUALITY

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Peter Hearn  
*Executive Director*

March 23, 2022

Frederick Riese  
CT Department of Energy and Environmental Protection (DEEP)  
79 Elm Street  
Hartford, CT 06106

RE: Environmental Impact Evaluation (EIE) for the Ox Brook Flood Control Master Plan

Dear Mr. Riese:

The Council on Environmental Quality (“Council”) has reviewed the EIE for the Ox Brook Flood Control Master Plan and has the following questions regarding Phase 1.

The EIE states that “there are no identified NDDB areas within the Project Area or immediate vicinity” and that “the Project is not expected to impact listed Connecticut species or their habitats”. The Council notes that the Natural Diversity Database (NDDB) mapping is a pre-screening tool and is not a substitute for an on-site survey. A survey of the areas potentially impacted by Phase 1 of the proposed project is recommended, prior to construction, to assess the presence of wildlife and endangered, threatened and special concern species or suitable habitat that might be present. If found, the Council recommends consultation with the NDDB to develop and implement plans to eliminate or mitigate any potential adverse impacts.

The EIE sheet C1.00 identifies a vernal pool immediately north of the existing dam within Elton Rodgers Park. The EIE does not indicate if potential negative impacts on the vernal pool envelope (VPE) and the critical terrestrial habitat (CTH) were examined. The Council recommends an assessment to determine the potential impact the proposed action would have on the VPE and CTH and/or if one or more vernal pools would be created by the proposed project.

The Council notes that the proposed work associated with Phase 1 of the proposed project has the potential to introduce or expand the habitat for invasive species. The EIE does not indicate that action to eradicate invasive species is included in the plan. The Council recommends the inclusion of an invasive species control/eradication component for the construction with a follow-up during the following year.

The United Illuminating Company has received Connecticut Siting Council approval (Docket 490 – January 2021) to construct a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by the United Illuminating Company at 312 and 330 Kaechele Place in Bridgeport. The Council notes that coordination of the two construction projects might avoid unanticipated issues and benefit both projects.

Thank you for your consideration of these comments.

Sincerely,

Peter Hearn, Executive Director