State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

Instructions for Use:

The Environmental Review Checklist (ERC), as defined in Sec. 22a-1a-1(9) of the Regulations of Connecticut State Agencies (RCSA), is intended to assist state agencies in (1) determining whether a proposed action or category of actions requires public scoping, or (2) in recording an agency's initial assessment of the direct, indirect, and cumulative environmental effects of a proposed action at the completion of public scoping.

For the purposes of CEPA, an Action is defined in Sec 22a-1a-1(2) of the RCSA as an individual activity or a sequence of planned activities initiated or proposed to be undertaken by an agency or agencies or funded in whole or in part by the state.

Completion of the ERC is only *required* as part of a sponsoring agency's post-scoping notice in which the agency has determined that it will not be preparing an EIE (Sec. 22a-1a-7(d) of the RCSA).

In all other instances, the sponsoring agency has the option to use this form or portions of it, in conjunction with the applicable Environmental Classification Document (ECD), as a tool to assist it in determining whether or not scoping is required and to document the agency's review. This can be especially useful for an agency administering a proposed action that is not specifically represented in the ECD or which may have additional factors and/or indirect or cumulative impacts requiring further consideration.

Even if an agency ultimately determines that public scoping is not necessary, as a matter of public record OPM highly recommends that the agency internally document its decision, and its justification.

In completing this form, include descriptions that are clear, concise, and understandable to the general public.

Note that prior to reviewing a proposed action under the Connecticut Environmental Policy Act (CEPA), Connecticut General Statutes (CGS), Section 16a-31 requires agencies to review any proposed actions for the acquisition, development or improvement of real properties, or the acquisition of public transportation equipment or facilities, and in excess of $200,000, for consistency with the policies of the State Plan of Conservation and Development (State C&D Plan).

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PART I – Initial Review and Determination

Date:	**March 31, 2025**
Name of Project/Action:	**Occum Industrial Center (OIC) Roadway Project**
Project Address(es):	**180 Lawler Lane, 432 Canterbury Turnpike and 145 Taftville-Occum Road**
Affected Municipalities:	**Norwich, Connecticut**
Sponsoring Agency(ies):	**Connecticut Department of Economic and Community Development (CT DECD)**
Agency Project Number, if applicable:	**N/A**
Project Funding Source(s)/Program(s), if known:	**Community Investment Fund (2030)**

Identify the Environmental Classification Document (ECD) being used in this review:
☒ Generic, or ☐ Agency-Specific

☒ An environmental assessment or environmental impact statement is being prepared pursuant to NEPA, and shall be circulated in accordance with CEPA requirements.

A NEPA EA is required because the project involves the potential award of a U.S. DOT RAISE Grant (2024) and a change in access to Interstate 395 at Exit 18.

☒ The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment, or indicate the status of those reviews: **SHPO Concurrence received on March 25, 2024 (see attached for reference)**

☒ Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency's responsibilities under *Section 22a-1a-7 of the Regulations of Connecticut State Agencies* (RCSA).

Completed by: **Paul Stanton, Senior Project Manager, Matrix New World Engineering / Ryan Acosta, Project Manager / Civil Engineer, DECD**

Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.

PART II – Detailed Project Information

Description of the Purpose & Need of the Proposed Action: The purpose of the Occum Industrial Center (OIC) Roadway Project (the "Project") is to create a new roadway (hereinafter "Occum Way") that will connect Taftville-Occum Road (Route 97) to Lawler Lane in the City of Norwich, Connecticut. This new roadway will ultimately service the OIC, in an area comprised of significant undeveloped acreage with the potential for various commercial and industrial uses (e.g., manufacturing, assembling, transportation, logistics, work-force development, fire/safety facilities and flex-space). The roadway project is needed to facilitate access to the OIC, which has been designed to expand operating space for existing businesses in the vicinity of the Project Site, as well as to attract new businesses to create employment opportunities for the distressed communities of southeastern Connecticut and beyond. Attracting and establishing new businesses at the OIC will provide employment that is much needed in the region; is counter cyclical to the defense industry; and will provide businesses associated with the wind turbine cluster and an environment to build these businesses with easy access to the State Pier in New London, which is the physical nexus of this cluster.

Description of the Proposed Action: Norwich Community Development Corporation (NCDC) in coordination with Norwich Public Utilities (NPU) is poised to construct a new 184-acre industrial park (OIC) in the City of Norwich for potential commercial and industrial uses. The OIC is proposed to be accessed by a new roadway (Occum Way) (the "Proposed Action") that is the subject of this Environmental Review Checklist; future development of the new commercial and industrial park parcels falls under the purview of NCDC and is not the subject of this Environmental Review Checklist.

The Proposed Action involves the construction of a new 7,532± linear foot (LF) east-west roadway (Occum Way) within a proposed 60-foot-wide right-of-way (ROW) that will connect Taftville-Occum Road (Route 97) to Lawler Lane in the City of Norwich. The roadway, which will include a 10-foot-wide multi-use trail along its entire length, is proposed to service the OIC. The typical roadway section consists of two 11-foot travel lanes, two 4-foot paved shoulders, two 3-foot gravel strips, and a 10-foot wide, permeable paved multi-use trail. Grass swales will also be constructed outboard of the paved roadway and trail surfaces. The Occum Way improvements will also involve the introduction of a signalized intersection and associated modification of the existing I-395 southbound on-and-off ramps to allow for safe and efficient access to Route 97 and the new Occum Way from I-395, as well as a round-about along Occum Way at Canterbury Turnpike.

Construction of Occum Way will entail four box culvert crossings of existing wetlands/drainageways as well as a bridge that will span Byron Brook and associated riparian wetlands. Stormwater management and water quality will be obtained through seven stormwater management basins and an associated conveyance system located within the proposed right-of-way. Electric, water, gas, high speed fiber optic communication and sanitary sewer lines will be installed to service future development within the OIC. All utilities will be underground. New traffic controls for traffic quieting and signalization will be installed as part of the construction (refer to the traffic/transportation section of this checklist).

Occum Way is anticipated to be constructed in phases that will progress depending upon user demand within the OIC. The anticipated construction period of the entire new arterial road system will take between six and eight months.

Occum Way and its accompanying systems/infrastructure will be owned and maintained by the City of Norwich and NPU. Typical maintenance will occur during the roadway's life to maintain pavement conditions, utilities, and stormwater management. Future development of the industrial park parcels and associated approvals, however, will fall under the purview of NCDC and is not the subject of this Environmental Review Checklist.

Alternatives Considered: NCDC evaluated alternatives based on the purpose and need of the Project, engineering constraints, and the potential for environmental impacts. NCDC also considered expected costs in evaluating the feasibility of alternatives, but costs were not the controlling factor. In addition to considering a "No Action" Alternative, various density-driven alternatives were considered. This section discusses the No Action Alternative and other alternatives that were considered but were ultimately eliminated from further analysis for various reasons presented herein.

(1) No Action Alternative: The No Action Alternative would not meet the goal of developing a regional business hub that will support the local economy by creating jobs for the area surrounding the City of Norwich. Mitigation measures discussed throughout this Environmental Review Checklist were developed to avoid adverse environmental impacts and support the idea of moving forward with the Project as proposed. The No Action Alternative would result in adverse financial impacts by constraining future economic growth, not just to the City of Norwich but to surrounding communities in southeastern Connecticut due to the lack of potential development and utility availability.

(2) Other Alternatives Considered and Eliminated:

With respect to the physical alignment of Occum Way, the roadway's conceptual design has been modified and developed to avoid and minimize impacts to regulated wetlands and water resources to the greatest extent possible while also taking into consideration topographic constrains/features and such as ledge on the site. The alignment also enables direct, safe, and efficient access to and through the OIC property and to/from I-395, Canterbury Turnpike, and Route 97. Its configuration affords effective access to the internal development parcels of OIC, allowing for maximum land development potential of each of the individual parcels. As such, the Occum Way alignment was selected as the preferred option to be assessed in this Environmental Review Checklist and all other potential roadway alignments have been eliminated from further consideration. With respect to the actual siting of the OIC in general, Norwich has one significant business park which is currently at 90% capacity and has no physical room to grow. Most of the buildings at that existing site were erected in the 1980s and 1990s and, as a result, are functionally obsolete to meet current industrial criteria for such characteristics as floor loads, ceiling height, robotic conduits, and logistics among others. For these reasons, that business park site was eliminated from further consideration as a potential option for a new industrial park. Additionally, several old mills that exist in Norwich that are designated as brownfields, and which are predominantly located within the densely populated downtown region of Norwich were also briefly considered for industrial park development but were subsequently eliminated from further consideration due primarily to the lack of direct transportation access to/from I-395 and other key routes. In siting the OIC, NCDC engaged the input of third-party marketing experts and industrial brokers who concluded that a modern industrial park in eastern Connecticut, particularly located along and with direct access to the I-395 corridor is needed. The vacant, undeveloped and underutilized land located off of I-395 at Exit 13 in the vicinity of Route 97 and Canterbury Turnpike was therefore chosen as the preferred site of the OIC.

Public concerns or controversy associated with the proposed action:

During the public hearing portion of the inland wetlands permitting process concerns were raised by neighbors about the impacts on wetlands and wildlife. While the neighborhood concerns were understandable, the public comments were without firm evidentiary support - NCDC provided expert witness response to assuage the publics concerns regarding the nature and extent of wetland impacts through the implementation of minimization and mitigation strategies before work on the project begins. Additionally, the public was provided with a summary of the State review and approval process regarding the impact on the wetlands, flora and fauna, wildlife and historic investigations as cited in other sections of this form. The Norwich Inland Wetland Commission considered all of the public input and the NCDC expert witness input resulting in a unanimous decision granting the inland wetland permit for Occum Way.

PART III – Site Characteristics (Check all that apply)

The proposed action is non-site specific, or encompasses multiple sites;	☒
Current site ownership:	☐ N/A, ☐ State; ☐Municipal, ☐ Private, ☒ Other: NCDC; U.S. DOT (I-395 Access Roadway)
Anticipated ownership upon project completion:	☐ N/A, ☐ State; ☒Municipal, ☐ Private, ☒ Other: U.S. DOT (I-395 Access Roadway)

Locational Guide Map Criteria:
https://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=bdb36b3a47db437a9e7e42a7d0834b01

Priority Funding Area factors:

☒ Designated as a Priority Funding Area, including ☒ Balanced, or ☐ Village PFA;
☒ Urban Area or Urban Cluster, as designated by the most recent US Census Data;
☐ Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
☐ Existing or planned sewer service from an adopted Wastewater Facility Plan;
☒ Existing or planned water service from an adopted Public Drinking Water Supply Plan;
☒ Existing local bus service provided 7 days a week.

Conservation Area factors:

☐ **Conservation Area Factors** ☐ **6-7 Factors** ☐ **4-5 Factors** ☒ **1-3 Factors**

☐ Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
☐ Existing or potential drinking water supply watershed(s);
☐ Aquifer Protection Area(s);
☐ Wetland Soils greater than 25 acres;
☐ Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
☐ Category 1, 2, or 3 Hurricane Inundation Zone(s); (Storm Surge)
☐ 100 year Flood Zone(s); (no buildings or site development in 100 or 500 year flood elevations)
☒ 500 year Flood Zone(s);
☐ Critical Habitat;
☐ Locally Important Conservation Area(s),
☐ Protected Land (list type): N/A
☐ Local, State, or National Historic District(s).
☒ Agricultural Land

Department of Housing

☐ Existing Building over 50 years old, eligible for SHPO
☐ Urban Re-zoning
☐ Greenfield Development of Housing over 150 beds
☐ Parking over 200 spaces

PART IV - Assessment of Environmental Significance – Direct, Indirect, And Cumulative Effects

Required Factors for Consideration (Section 22a-1a-3 of the RCSA)	**Agency's Assessment and Explanation**
Effect on water quality, including surface water and groundwater;	Based on a review of the Connecticut Department of Energy and Environmental Protection (CT DEEP) Connecticut Water Quality Classification Interactive Web Map,[1] all surface waters on the Project Site, including lakes, ponds, and brooks, are classified as Class A waters, or waters with uniformly good-to-excellent, natural quality. Class A waters have designated uses including habitat for fish and other aquatic life and wildlife; potential drinking water supplies; recreation; navigation; and water supply for industry and agriculture. The Project Site also intersects one area of groundwater classified as GAA, or an area where the existing or potential public supply of water is suitable for drinking without treatment. Construction of Occum Way and associated utility connections will result in the temporary and permanent disturbance of surface waters on the Project Site, including for the construction of four box culvert crossings of existing surface waters as well as a bridge that will span Byron Brook. Additionally, several stormwater management basins are proposed within 100-foot Upland Review areas; however, these stormwater management basins are proposed to provide water quality and peak stormwater rate mitigation of drainage prior to it entering surface waters. In conjunction with the latest *Connecticut Stormwater Quality Manual* (effective March 30, 2024), the drainage design maintains or reduces the proposed peak stormwater rates to existing conditions. Moreover, the 1-inch water quality volume will be captured and allowed to slowly infiltrate the soil within the stormwater management basins. Erosion and sediment controls will be provided in concurrence with the latest *Connecticut Guidelines for Soil Erosion and Sediment Control* (effective March 30, 2024) (see Effect on flooding, in-stream flows, erosion or sedimentation discussion below). To avoid and/or minimize potential impacts to water quality, the Project will adhere to a project-specific Erosion and Sedimentation Control Plan. The Erosion and Sedimentation Control Plan will be

[1] CT DEEP. Connecticut Water Quality Classification Interactive Web Map. Available online at https://ctdeep.maps.arcgis.com/apps/webappviewer/index.html?id=a23ad81358e749aab86342aed4c2dfe7. Accessed October 2023.

	implemented and maintained in conformance with the latest *Connecticut Guidelines for Soil Erosion and Sediment Control* (effective March 30, 2024) and other federal and state policies. Silt fences, hay bales, and other erosion and sedimentation controls will be installed adjacent to the Project's limit of disturbance. These controls will be maintained throughout the construction period (i.e., until exposed soils have become stabilized). Specialized drainage improvements proposed as part of the Project's design, including a temporary (construction) earth retaining system, installation of silt fences, compost filter socks, and sediment traps, and installation of a permanent drainage system, will facilitate longitudinal self-draining and eliminate saturation of Occum Way, and improve the quality of stormwater that ultimately discharges from the Project Site to surface waters. The Proposed Action will not directly or indirectly impact areas of groundwater beneath the Project Site. Therefore, no adverse effects on groundwater will result from the construction of, or vehicular use of Occum Way.
Effect on a public water supply system;	Existing public water supply systems in the vicinity of the Project Site will not be adversely affected by the Proposed Action as neither construction nor operation of Occum Way will utilize public water. There will be no impact on the quality or quantity of public water supplies currently provided in the vicinity of the Project. While the Project Site also intersects one area of groundwater classified as GAA (an area where existing and/or proposed public supplies of water are suitable for drinking without treatment), and while nearby residences access potable water via individual wells, it is not likely that these groundwater resources will be adversely impacted by the construction and/or future vehicular use of Occum Way.
Effect on flooding, in-stream flows, erosion or sedimentation;	Based on a review of Federal Emergency Management Agency (FEMA) Effective Flood Insurance Rate Maps (FIRM) (FIRM Panel Nos. 09011C0204G and 09011C0208G, dated July 18, 2011), the Project Site is partially in the 0.2% Annual Chance Flood Hazard (Shaded Zone X). To determine pre-development stormwater drainage and site runoff conditions, Bohler prepared a Drainage Report for not only the proposed roadway (Occum Way) but also the new 184-acre industrial park (OIC) in February 2022. The Drainage Report analyzed pre-development stormwater drainage conditions at four "design points" where stormwater runoff currently drains, and subdivided the site into five separate subcatchments to analyze

	existing flow rates at each design point. The rainfall data provided in the Drainage Report for stormwater calculations was based on data presented in the National Oceanic and Atmospheric Administration (NOAA) ATLAS. A summary of existing peak runoff rates and volumes for the 2-, 10-, 25-, and 100-year storms is presented in the Drainage Report. Under the proposed condition, Occum Way will drain into seven different conveyance systems, which include a series of catch basins. The catch basins will capture and convey stormwater runoff, via an underground pipe system, to the proposed above ground infiltration basin. According to the *2004 Connecticut Stormwater Quality Manual* (which was effective at the time the Drainage Report was prepared), the first inch of all proposed impervious runoff must be treated. This correlates to a total required water quality storage volume of 16,337 cubic feet, whereas the design exceeds the water quality storage volume requirement. The Project will also provide erosion and sedimentation controls during the demolition and construction periods, as well as long term stabilization of the site. Catch basins are proposed to collect and route runoff from the new roadway to the proposed above ground infiltration basin. Pipes have been designed for the 10-year storm using Rational Method. Pipe sizing calculations are included in Appendix E of the Drainage Report. As the time the Drainage Report was prepared, best management practices (BMPs) incorporated into the proposed stormwater management system had been designed to meet the total suspended solid (TSS) removal requirements as set forth in the *2004 Connecticut Stormwater Quality Manual*; refer to Appendix E of the Drainage Report for calculations. In addition, a Stormwater Operation and Maintenance (O&M) Plan, included as Appendix F of the Drainage Report, had been developed which includes scheduled maintenance and periodic inspections of stormwater management structures. In summary, the proposed stormwater management system results in a reduction in peak rates of runoff from the Project Site when compared to pre-development conditions for the 2-, 10-, 25- and 100-year storm frequencies. Construction of Occum Way would therefore not result in or exacerbate flooding conditions on or downstream of the Project Site. In addition, the proposed BMPs will result in an effective removal of total suspended solids from the post-development runoff. The pre-development versus post-

	development stormwater discharge comparisons are contained in Table 6.1 of the Drainage Report.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site;	Phase 1A, IB, and II Cultural Resources investigations were completed for the proposed OIC by Archaeological Consulting Services (ACS). In a letter dated March 25, 2024 (see attached), the CT State Historic Preservation Office (SHPO) concurred with the findings and recommendations of those investigations and reaffirmed its earlier opinion in correspondence dated November 17, 2022 that "no historic properties will be affected by the proposed development". Should the design of Occum Way change and potentially involve land areas not previously assessed in ACS's investigations, then consultation with SHPO would need to be re-opened to secure any necessary cultural resource approvals.
Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;	A review of the CT DEEP Natural Diversity Data Base (NDDB) GIS mapping revealed mapped locations of rare species associated with the Project Site. A request for details of this rare species information was submitted to the CT DEEP, and in response dated November 28, 2022, the CT DEEP indicated that two State Special Concern flora species – Creeping St. Johnswort (*Hypericum adpressum*) and Alleghany Plum (*Prunus allegheniensis*) – and three State Special Concern and State Endangered fauna species – Spotted Turtle (*Clemmys guttata*), Eastern Hognose Snake (*Heterodon platirhinos*), and Eastern Spadefoot (*Scaphiopus holbrookii*), respectively – are now or formerly known to exist on the Project Site. However, based on determinations made in two reports submitted to the CT DEEP – the *Botanical Report for Project: Preliminary Assessment for New Arterial Roadway to Serve Future Business and Commercial Park, NCDC – Bryon Brook Study Area, 13 Parcels North of Rte. 395 Bordered by Lawler Lane to the West and Rte. 97 to the East in Norwich, Connecticut* developed by Dr. Bryan Connolly on September 12, 2022, and the *Diurnal and Nocturnal Amphibian and Reptile Surveys for the State Listed: Eastern Spadefoot, Spotted Turtle, and Eastern Hog-nosed Snake for New Arterial Roadway to Serve Future Business and Commercial Park, NCDC- Bryon Brook Study Area, 13 Parcels North of Rte. 395 Bordered by Lawler Lane to the West and Rte. 97 to the East in Norwich, Connecticut* developed by Dennis P. Quinn and dated November 21, 2022 – no state-listed plant, amphibian or reptile species were found on the Project Site. The CT DEEP accepted both reports and concurred with their findings in a November 28, 2022 response letter.

	As a precautionary measure, the CT DEEP recommended the Proposed Action implement protection measures during construction activities to help reduce impacts to amphibians and reptiles. With the implementation of these recommended protection measures, adverse effects to state-listed flora and fauna species from the Proposed Action are not expected. In addition to these five species, the CT DEEP identified two rare habitats as occurring on the Project Site: a freshwater community identified as “Alluvial Swamp” and a terrestrial community identified as “Floodplain Forest”. The potential occurrence of these habitats on the Project Site was assessed in November 2021 during site visits conducted to characterize and delineate wetland and watercourse resources. Based on field evaluations, there are no floodplain forests or alluvial swamps on the Project Site. These natural communities are alluvial wetlands influenced by seasonal inundation, with flood deposited sandy or nutrient-rich silty soils. These habitats are associated with the Shetucket River floodplain in the vicinity of the Project Site. There are no alluvial soil types on the Project Site. Site elevations and the location of Route 97 between the Project Site and the Shetucket River prevent seasonal flooding and alluvial deposition associated with the Shetucket River.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	The Proposed Action involves the construction of a new roadway (Occum Way) in an area that is currently comprised of undeveloped wooded areas and open farmland, with areas of wetlands and waterbodies. Toxic and/or hazardous materials, or any other substance that has the potential to cause unreasonable adverse effects on the environment, will not be used during construction or operation of the new roadway, not only due to its proximity to natural features but also because of the nature of the Project. Additionally, in coordination with CTDOT’s Office of Environmental Compliance (OEC), specifications will be developed as needed for the proper soil handling, storage, and disposal in compliance with State and Federal regulations. Additionally, any temporary facilities used for outdoor storage of hazardous and/or flammable materials during construction will automatically be secured and set above the elevation of the 500-year flood (0.2% Annual Chance Flood Hazard) area. Given the Project Site’s undeveloped condition, herbicides may be used on an intermittent basis to clear the site of invasive flora

	species. The use of herbicides on the Project Site will be thoroughly coordinated with OEC prior to their use.
Substantial aesthetic or visual effects;	The site is currently comprised of undeveloped wooded areas and open farmland, with areas of wetlands and waterbodies. Adjacent residents and travelers along I-395 will have views of heavy construction equipment including backhoes, dump trucks, graders, and pavers among others during the period of active construction of Occum Way and the associated wet and dry utility infrastructure. Once Occum Way is built and access to development parcels is gained, the landscape will gradually transform from its current undeveloped character into the planned OIC, thereby changing the visual and aesthetic character of the area. Limited portions of the OIC will be visible to residents within the Sunny Waters Mobile Home Park, and those living along Scotland Road, Lawler Lane, and portions of Canterbury Turnpike. Views of the new OIC will also be gained by travelers along I-395, particularly in the southbound direction. Full build-out of the OIC is anticipated to occur by the year 2033 but the actual timeframe will be driven by economic factors.
Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;	The effective State of Connecticut's *Conservation & Development Policies: The Plan for Connecticut 2018-2023* (the "State C&D Plan") (adopted May 4, 2022) is built around six Growth Management Principles outlining the objectives of the state, followed by a set of relevant policy statements that provide the basis for state agencies to assess the consistency of their proposed plans and actions with the State C&D Plan. These Grown Management Principles include: #1 Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure; #2 Expand Housing Opportunities and Design Choices to Accommodate a Variety of Household Types and Needs; #3 Concentrate Development Around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options; #4 Conserve and Restore the Natural Environment, Cultural and Historical Resources, and Traditional Rural Lands; #5 Protect and Ensure the Integrity of Environmental Assets Critical to Public Health and Safety; and #6 Promote Integrated Planning Across all Levels of Government to Address Issues on a Statewide, Regional and Local Basis. As stated in the Part II – Detailed Project Information above, the purpose of the Project is to create a new roadway (Occum Way) that will ultimately service a new industrial park in the City of Norwich. The city itself only has one significant business park which is

	currently running at 90% capacity and has no physical room to grow; most of the buildings were also erected in the 1980s and 1990s and, as a result, are functionally obsolete to meet current industrial criteria for such characteristics as floor loads, ceiling height, robotic conduit and logistics. There are also several old mills left in the City of Norwich which are designated brownfields and are located (with one exception) in the densely populated downtown region of the City's core making transportation to and from these facilities not practical. In contract, the Project Area is located in the immediate vicinity of the I-395 corridor and is in an area underserviced with modern industrial buildings with desirable building characteristics with immediate access to transportation nodes and/or along major transportation corridors. While the Project Site was, in part and at one time, an agricultural use, it has not been actively farmed in over 25 years. The proposed roadway (Occum Way) would not result in the disturbance of prime farmland that exists in the vicinity of the site thereby avoiding the loss or conversion of agricultural lands. The Project would also not result in adverse effects to cultural or historic resources, or the natural environment (see the respective assessments and explanations elsewhere in this document). Therefore, the construction and operation of Occum Way would be consistency with the intent of Growth Management Principle #1, and would further be consistent with Growth Management Principles #3 through #6. Since housing is not proposed as part of the Project, Growth Management Principle #2 is not applicable. Construction of Occum Way is also consistent with the *City of Norwich 2013 Comprehensive Plan of Zoning* as well as the recent *City of Norwich 2023 Plan of Conservation & Development Strategic Elements* (approved by the Commission on the City Plan August 2023 and effective September 2023). The property has been and continues to be designated as PPD and GC zoning districts, adopted by the City of Norwich Council in its role as zoning authority in 1974, which allow for commercial and industrial uses.
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c)	No disruption or division of an established community, or inconsistency with adopted municipal or regional plan, will occur.

and 8-37t of the CGS require additional analysis;	
Displacement or addition of substantial numbers of people;	The Proposed Action involves the construction of a new roadway (Occum Way) in an area that is currently comprised of undeveloped wooded areas and open farmland, with areas of wetlands and waterbodies. Construction of Occum Way will not result in the displacement or addition of substantial numbers of people as residential uses do not currently exist on-site, nor will the Proposed Action result in the addition of residential uses.
Substantial increase in congestion (traffic, recreational, other);	A detailed *Traffic Impact Study (March 19, 2024)* was performed for the project by CDM Smith. The study considers full build-out of the 184-acre OIC site by 2033, which is anticipated to consist of approximately 1,495,000 square feet (S.F.) of warehouse, manufacturing, and distribution space, 36,000 S.F. of flex space, and 40,000 S.F of office space, and approximately 2,534 parking spaces. ***The following is a list of findings and conclusions along with CDM Smith's opinion on the traffic impact of the proposed OIC development on the adjacent roadway network***: 1. The construction of the proposed Occum Way between Lawler Road to the west and Route 97 to the east would provide an overall benefit in traffic circulation and access between the site and I-395, Route 97, Canterbury Turnpike, and other points. The proposed Occum Way should be designed to meet City of Norwich standards. 2. The Route 97 at Occum Way intersection is anticipated to operate at an overall Level of Service (LOS) B under the future (2033) Build AM and PM peak hour traffic conditions with the suggested traffic mitigation in place. 3. The Route 97 at I-395 Exit 18 Northbound Ramps/Gas Station driveway is anticipated to operate at an overall LOS D or better under the future (2033) Build AM and PM peak hour traffic conditions with the suggested traffic mitigation in place. 4. The Canterbury Turnpike at Occum Way intersection is anticipated to operate at an overall LOS A under the future (2033) Build AM and PM peak hour traffic conditions with the suggested traffic mitigation in place.

	5. The Lawler Lane at Occum Way intersection is anticipated to operate at an overall LOS A under the future (2033) Build AM and PM peak hour traffic conditions with the suggested traffic mitigation in place. 6. The proposed signalized intersection at I-395 SB Exit 18 Off-Ramp at Occum Way is anticipated to operate at an overall LOS A under the future (2033) Build AM and PM peak hour traffic conditions respectively with the suggested traffic mitigation in place. 7. Any proposed improvements to I-395 including the on and the off ramps should be designed to meet FHWA and CTDOT standards. 8. The round-about on the Occum Way at Canterbury Turnpike should be designed to meet City of Norwich and CTDOT standards. 9. All site driveways to the proposed development should be designed in accordance with the City of Norwich standards. Intersection traffic mitigation measures are documented in detail in the Traffic Study Report. CDM Smith concludes that the planned OIC development will not create a significant impact to the adjacent roadway system and the nearby study area.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	Construction of Occum Way in and of itself will not directly result in a substantial increase in the type or rate of energy use. Occum Way will provide access to land to facilitate build-out of the OIC, which is anticipated to include warehouse, manufacturing, distribution, flex and office space totaling approximately 1.6M S.F of space. The space will have an associated future energy demand. However, it is unknown at this time what the respective energy needs will be of potential future OIC businesses/tenants. NCDC will be responsible for overseeing and permitting the OIC build-out process and will ensure energy conservation measures and efficiencies are considered and incorporated by each developer as necessary and appropriate.
The creation of a hazard to human health or safety;	No creation of a hazard to human health or safety will occur with the construction of Occum Way and its associated wet and dry utility infrastructure.

Effect on air quality;	The project is included in CTDOT's *Ozone and $PM_{2.5}$ Air Quality Conformity Determination of the 2019-2045 Metropolitan Transportation Plan and the 2021-2024 Transportation Improvement Programs as amended (February 2022)* and is also included in the CTDOT's *Ozone and $PM_{2.5}$ Air Quality Conformity Determination of the 2023-2050 Metropolitan Transportation Plan and the 2025-2028 Transportation Improvement Programs as amended (February 2024).* Air quality impacts from construction of Occum Way and its eventual use by OIC-related traffic are therefore not anticipated and the project conforms with the Clean Air Act. Any potential temporary impacts during the construction period can be avoided or limited by the contractor's proper operation of construction equipment and adherence to regulations limiting idling of engines.
Effect on ambient noise levels;	Although a formal noise study has not been specifically performed for this project, the project site is located within a lightly wooded, rural residential area. Numerous readily accessible online studies that have evaluated ambient noise levels for a variety of land use categories/densities report ambient noise levels in the range of 50 to 60 dB(A) for land use characteristics similar to that found at the OIC site, especially within interior and western portions of the OIC site. It is expected that potentially higher ambient noise levels approaching ± 70dBA would likely be experience along the eastern-most boundary of the site due to its proximity to I-395. Any noise impacts during construction of Occum Way will be temporary and will be minimized to the greatest extent practicable by compliance with the CTDOT Standard Specifications for Roads, Bridges, Facilities, and Incidental Construction Form 818 regarding construction noise pollution. "Section 1.10.05 – Noise Pollution: The contractor shall take measures to control noise intensity caused by his construction operations and equipment, including but not limited to equipment used for drilling, pile driving, blasting, and excavating or hauling. All methods and devices employed to minimize noise shall be subject to continuing approval by the Engineer. The maximum allowable level of noise at the nearest residence or occupied building shall be 90 decibels on the "A" weighted scale (dB(A)). Any operation that exceeds this standard will cease until a different construction methodology is developed to allow work to proceed within the 90 dB(A) limit."

	Additionally, the contractor will be required to comply with the City of Norwich noise ordinance, which includes restrictions on construction between the hours of 10PM and 7AM. Noise generated along Occum Way once it is open to traffic is not expected to result in a substantial increase in ambient noise levels or adverse noise impacts to nearby residences primarily because the low posted speed limit and the volume of traffic that is expected to use Occum Way daily. That volume of traffic will gradually increase over time as OIC build-out progresses, but is not anticipated to result in a significant change to ambient noise conditions in the project area.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	The Proposed Action involves the construction of Occum Way in an area that is currently comprised of undeveloped wooded areas and open farmland, with areas of wetlands and waterbodies. Temporary impacts to land resources and landscapes, as well as inland wetlands, will occur during the construction period. Permanent impacts including filling of some inland wetlands will also occur due to grading and vertical roadway constraints; however, the Applicant (NCDC) has received approval on their Inland Wetlands and Watercourses Application (IWWA). No permanent adverse effects are anticipated.
Effect on agricultural resources;	Both the 2013 and the 2023 Comprehensive Plans address the entire City's agricultural assets. While the property in question was, in part, at one time, a farm, it has not been actively farmed in over 25 years. Examining the detailed agricultural and potential development plans in the *2023 Plan of Conservation & Development Strategic Elements* demonstrate that the City, in adopting these two plans in the last ten years excluded the property from its agricultural inventory as it recognized the need to balance conservation of agricultural land with the need to attract new businesses to underwrite real estate taxes, personal property taxes and utility revenue to reduce the cost of the municipal government on the citizens of the City and provide a catalyst for employment opportunities.
Adequacy of existing or proposed utilities and infrastructure;	The Project Area is mostly undeveloped – consisting of farmlands, wetlands, waterbodies, and undeveloped wooded area – and is not currently improved with utilities or infrastructure. Occum Way, however, is proposed to incorporate all required wet and dry utilities to service the OIC. Ongoing coordination with Norwich

	Public Utilities has resulted in the development of a plan for supplying the OIC.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Negative impacts from construction of Occum Way and its eventual use by future OIC-related traffic are not anticipated. Construction phase impacts on greenhouse gas emissions will be limited. Any temporary impacts during the construction period can be avoided and limited by contractor adherence to existing regulations the limit the idling of engines.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Occum Way and all associated improvements will be constructed outside of the 1.0% Annual Chance Flood Hazard area. The proposed stormwater management as designed will also provide a decrease in peak rates of runoff from the proposed roadway for the 2-, 10-, 25- and 100-year design storm events. Additionally, the project is located outside of the coastal boundary and will not be exposed to climate change hazards related to seal level rise and associated coastal flooding. No adverse effects from a changing climate are anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Included in the construction of Occum Way is a new multi-use trail that will comply with the City of Norwich's subdivision regulations which require a sidewalk along any new road; in lieu of the traditional four-foot-wide sidewalk, the Applicant (NCDC) has opted to provide a multi-use trail that will be open to the public extending from Route 97 to the east and terminating at Lawler Lane to the west. The multi-use trail will intersect areas of farmland, wetlands, waterbodies, and undeveloped wooded areas thereby providing a beneficial recreational and scenic resource to the public in an area that does not currently offer these resources.
Cumulative effects.	Construction of Occum Way and associated wet and dry utility infrastructure (which is the subject of this Environmental Review Checklist) will provide future access and service to the development parcels that comprise the 184-acre OIC. Development of the individual OIC parcels could potentially result in additional indirect and cumulative environmental impacts within the project site and its immediate surroundings. NCDC will be responsible for overseeing the OIC build-out process and associated permit approvals that will be required, and to that end will ensure that each parcel is developed in a manner that effectively avoids and/or minimizes impacts to regulated resources such as wetlands and watercourse (among others) to the greatest extent practicable. For those impacts that are unavoidable, mitigation measures will be

	developed in coordination with the NCDC and relevant local and state resource agencies and will be implemented to effectively offset adverse impacts. Potential impacts to inland wetlands and watercourses and regulated upland buffers, increased energy demand associated with future OIC buildings, increased traffic volumes, and potential increases in ambient noise levels as a consequent of increased traffic, are some of the cumulative impacts that may potentially occur with the full build-out of the OIC. These impacts have been identified and discussed in other sections of this Environmental Review Checklist. Similarly, a beneficial cumulative effect will be realized as new job creation attributed to OIC build-out will contribute to improved socioeconomic conditions for some within southeastern Connecticut. As previously mentioned, potentially adverse cumulative impacts will be assessed by NCDC and managed as the OIC build-out process unfolds.

PART V - List of Required Permits, Approvals and/or Certifications Identified at the Time of this Review

☒ **Flood Plain Management Certification - Department of Energy & Environmental Protection**

☒ **Inland Wetlands & Watercourses - Department of Energy & Environmental Protection**

☐ **Water Resource Construction Activities - Department of Energy & Environmental Protection**

☐ **Aquifer Protection - Department of Energy & Environmental Protection**

☐ **Dam Maintenance, Repair, Alteration - Department of Energy & Environmental Protection**

☐ **In Situ Soil Remediation - Department of Energy & Environmental Protection**

☒ **Stormwater Management - Department of Energy & Environmental Protection**

☐ **Environmental Land Use Restrictions - Department of Energy & Environmental Protection**

☐ **Remediation/Site Clean-up Program - Department of Energy & Environmental Protection**

☒ **State Historic Preservation Office Review & Approval or No-Adverse Effect**

☐ **Other**

PART VI – Sponsoring Agency Comments and Recommendations

Please refer to the attached comment letters which were received from the following CT State Agencies during the Public Scoping period: Connecticut Department of Energy and Environmental Protection (CT DEEP – Linda Brunza) and Connecticut Office of Policy and Management (CT OPM - Bruce Wittchen).

PART VII - Public Comments and Sponsoring Agency Responses:

No public comments were received during the Public Scoping period which ended on September 7, 2023. The CT DECD offers the following responses to CTDEEP and CT OPM comments that were received.

<u>CTDEEP (Linda Brunza) comment letter dated August 31, 2023</u>

Comments related to U.S Army Corps of Engineers permitting and stormwater permitting:

The project received a Local IWWC from the City of Norwich in June 2022. Section 22a-39M of the Inland Wetlands and Watercourses Act requires municipal inland wetland agencies to report all permit and enforcement actions to the Commissioner of the CTDEEP. CT DECD funding for the project was received in April 2023. The involvement of CT DECD funding triggered the need for CEPA compliance. The project will not require a Section 404 permit from the U.S. Army Corps of Engineers as impacts to federal wetlands will be less than the 5,000 S.F. threshold. A General Permit for Stormwater and Dewatering Wastewaters from Construction Activities will be required for the project as overall project disturbance will be greater than one (1) acre.

Comments related to the CTDEEP Remediation Division:

A Phase 1 Environmental Site Assessment (ESA) was conducted for the project in support of the City of Norwich local inland wetland permit application (see reference above) and was also supplied to CT DECD as part of the Community Investment Fund (CIF) application. The Phase 1 ESA concluded that there were no significant concerns other than the potential need to conduct some additional testing near an old Farmhouse on the project site prior to its demolition.

Comments related to the CTDEEP Fisheries Division:

A City of Norwich local inland wetlands permit has been secured for the project which considered impacts to Byron Brook.

Comments related to the CTDEEP Watershed Program:

This Environmental Review Checklist addresses potential project impacts and mitigation relating to water quality.

Comments related to CTDEEP Air Management Bureau:

As stated above in this Environmental Review Checklist, the proposed project is included in the Southeastern Council of Governments (SCCOG) Transportation Plan. That plan, and by default this project, complies with federal and state air quality emissions requirements as documented in the **Ozone and $PM_{2.5}$ Air Quality Conformity Determination of the 2019-2045 Metropolitan Transportation Plans and the 2021-2024 Transportation Improvement Programs, as amended (February 2022).** The project is also included in the most recently published (February 2024) **Ozone and $PM_{2.5}$ Air Quality Conformity Determination of the 2023-2050 Metropolitan Transportation Plans and the 2025-2028 Transportation Improvement Programs as amended.**

<u>CT OPM (Bruce Wittchen) comment letter dated September 7, 2023</u>

Comment #1: The state has supported several infrastructure extensions to serve large-scale commercial and industrial development in the broader Norwich region in recent years, while also supporting brownfield remediation projects and other redevelopment efforts intended to return properties already served by such infrastructure to productive use. As such, state agencies should ensure that additional state investments complement rather than compete with previous investments and do not needlessly increase public obligations to maintain infrastructure. Please describe how the region's existing pattern of economic development, infrastructure, housing, and other resources have been considered in determining such a project to be appropriate at this location.

Response #1: Norwich has one significant business park which is currently at 90% capacity and has not physical room to grow. Most of the buildings were erected in the 1980s and 1990s and, as a result, are functionally obsolete to meet current industrial criteria for such characteristics as floor loads, ceiling height, robotic conduit, and logistics. There are several old mills left in Norwich which are designated brownfields and are located (with one exception) in the densely populated downtown region of the City's core making transportation to and from these facilities not practical. NCDC engaged third party marketing expertise as well as input from third party industrial brokers which resulted in the same message: eastern CT, particularly along the I-395 corridor, is underserviced with modern industrial buildings in excess of forty thousand (40,000) S.F. with desirable building characteristics and immediate access to I-395. I-395 is an essential corridor that services the Boston, Worcester, Providence, Hartford, New Haven, and New York markets and is a major commuter route for many of the employees of Electric Boat and other major employers in Groton, in the southeast region of the state. The markets that Norwich and the greater Norwich can serve lack large industrially zoned parcels.

The greater New London County area is experiencing a growth in apartment housing ranging from low income to market rate. In particular, the City of Norwich and the City of New London have multiple projects that are either planned, about to break ground, or nearing completion that provide housing for virtually the entire income arc. In addition, many of the smaller communities in New London County have seen a spurt in the development pursuant to Connecticut General Statutes § 8-30g, of work force housing which is providing a much-needed boost to that income segment.

Comment #2: The scoping notice says: "*The roadway is anticipated to be constructed in phases that will progress depending upon user demand within Business Park North.*" Please describe any aspects of the project that will proceed regardless of demand and the procedure for allocating individual properties so that development proceeds in an organized manner and takes maximum advantage of public investment in infrastructure. Is the industrial park expected to be served by public and wastewater infrastructure and, if so, what funding would be used to provide that infrastructure, and would that also be phased?

Response #2: The arterial roadway design incorporates all of the required wet and dry utilities to service the industrially zoned lots and coordination with Norwich Public Utilities will be ongoing through the build-out of OIC.

The first phase of the project involves the construction of an approximately two thousand two hundred (2,200) linear foot section of Occum Way, which would connect Route 97 to the proposed signalized intersection. This phase "opens" up the proposed industrial center and allows NCDC to consummate parcel sales as future phases of the roadway are developed. NCDC continues to seek additional sources of funding to extend the initial phase by another approximately one thousand (1,000) linear feet to open up two to three of the larger parcels on-site. NCDC has retained Cushman Wakefield Industrial Group to market OIC. Based upon their projections, it is anticipated that initial users will be on board concurrent with the physical construction of the initial phase.

Future development of the OIC (i.e., indirect and cumulative impacts with respect to the same) are discussed above in this Environmental Review Checklist. However, it is noted that future development of OIC falls under the purview of NCDC and that the subject of this CEPA documentation is only construction of Occum Way and its associated wet and dry utility infrastructure.

Comment #3: What is the objective in creating a rotary at the I-395 interchange and shifting it to the west as shown on the project map? That location results in the rotary being adjacent to properties proposed to be developed, potentially creating conflicts not only between vehicle access to I-395 and to those businesses but also potentially increasing the threats to bicyclists, pedestrians, and others not in motor vehicles. If a rotary is appropriate in this setting, constructing it further east where the proposed new road intersects the existing on- and off-ramps would seem to provide the desired safe and efficient access to Route 97 and the new Business Park North Roadway from I-395, while reducing potential conflicts. Will the proposed road be a state or local road?

Response #3: The project involves the construction of one signalized intersection and one proposed round-about. The signalized intersection is designed strictly as part of the proposed relocation of the existing southbound I-395 Exit 18 ramps. Its design does not impact any of the proposed industrial sites and will provide improved ramp geometry which includes establishing deceleration and acceleration lanes for enhanced safety on I-395. The location was designed by CDM Smith, traffic consultants, and will be reviewed by OSTA, CTDOT and FHWA as part of the parallel NEPA review process.

The round-about along Occum Way at Canterbury Turnpike is designed to mitigate an existing speeding issue on Canterbury Turnpike (in the north/south axis) with a multi-use trail (see response to Comment #5 below) included as part of the design which will protect pedestrian and bicyclists. Crosswalks will be installed at the intersection of Occum Way and Canterbury Turnpike on the north side of the proposed round-about.

Occum Way is designed as, and is anticipated to be, a City of Norwich public roadway following the sequence of submission to, and acceptance by the City for new roads in the City's subdivision regulations.

A review of existing roadway conditions and the Project's potential effects on proximal roadways as well as area bicyclists and pedestrians has been addressed in a Traffic Impact Study prepared by CDM Smith (March 2024), and findings are summarized in this Environmental Review Checklist.

Comment #4: The proposed industrial park is in an area of what appears to be limited public transit service, with a bus from Norwich's Transportation Center arriving in the area every other hour six days per week. The scoping notice says expected uses of the proposed industrial park include work-force development and businesses likely to employ some low-wage workers and service providers. Given that those in job training or low-wage positions are likely to have a greater dependence on public transit, how might this project's location limit employment and job training opportunities for people in the broader region? What would be the impact on the transit provider to provide more frequent service, including potential cuts to other service if additional funding is not available?

Response #4: NCDC as part of its planning process, has been and continues to be in contact with Southeast Area Transit (SEAT), the local transit authority. SEAT currently operates 30 routes each weekday to the area of I-395, Exit 18, which means SEAT can easily accommodate the anticipated two-to-four bus stops along the proposed arterial roadway (Occum Way) accessing OIC. SEAT has indicated it will add Occum Way to its bus lines that directly connect the core of Norwich to the Occum neighborhood and will provide transportation to employees of the future businesses located in OIC.

<u>Workforce development:</u> NCDC in partnership with the Eastern Connecticut Workforce Investment Board (EWIB) is actively developing a workforce training and employer engagement model which will increase job opportunities for the underserved Norwich community in the OIC catchment area. This NCDC/EWIB

effort will also assist in providing the entire employment catchment area with a source of skilled labor including training in coding, CCN machine operation, vocational skills and computer skills.

<u>Manufacturing and Technology-Based Economic Development:</u> The goals of NCDC in developing OIC are to make it easy for existing businesses to expand and invest capital in modern, new plants; and to attract new businesses which will construct new plants opening the potential for supply chain expansion, additional capital investment in plant, equipment and technology.

Section 4 Partners in Program Outreach – Workforce Enhancement: NCDC is working with EWIB, a lead institution in the Offshore Wind Cluster Initiative workforce development project and will make available flex sites within OIC should EWIB require additional facilities for its programming. EWIB and its partners have previously created a strong governance structure of workforce stakeholders who will serve this manufacturing project, including employers, organized labor, colleges, comprehensive high schools, technical high schools, economic development and other state and regional agencies.

EWIB has established strong outreach to underserved communities in its manufacturing and other programs, driving equity results by making the skills training accessible to all members of the community through the American Job Center system.

NCDC is working to develop OIC with the General Dynamics (Electric Boat Division, manufacturers of submarines) purchasing team; the Eastern Advanced Manufacturing Association, the Connecticut Manufacturing Collaborative, and the Connecticut Business and Industry organization, as well as the University of Connecticut Real Estate Center.

NCDC is also actively working with AdvanceCT and the Connecticut Center for Advanced Technologies (CCAT) to market to prospective users interested in locating their businesses in a labor market with highly skilled workers. Defense-oriented companies like Sikorsky, Pratt and Whitney, Electric Boat and Stanley/Black and Decker along with over 4,000 tier II and tier III suppliers in their supply chain have established a skilled work force pool.

Comment #5: Is the proposed multi-use path a stand-alone path intended to serve only the industrial park or is it expected to be a component of a regional network? Will the trail be built in phases like the road and potentially only traverse a short, disconnected distance for an extended time? There could be other places in the city or region lacking such an amenity but having significantly greater use by bicyclists, pedestrians, and others not in motor vehicles. If so, is this the best location for the state to fund such a path?

Response #5: The proposed multi-use trail is being constructed to comply with the requirement of the City of Norwich's subdivision regulations which require a sidewalk along any new road. In lieu of the traditional four (4) foot wide sidewalk, NCDC has opted to provide a multi-use trail that will be open to the public extending from Route 97 to the east and terminating at Lawler Lane to the west. This sidewalk, to be constructed of pervious concrete, is designed as part of the required roadway system and storm water management best practices. The sidewalk will be built simultaneously with the road phases as each phase is developed.

Comment #6: Much of the project area is underlain by agricultural soils and a portion appears to be in active cultivation. This is a project that must be consistent with the state Conservation & Development Policies Plan (C&D Plan), which includes these relevant policies:

4.10 - Promote agricultural businesses and supportive industries that are vital to the local and regional economy, preserve prime farmland through the acquisition of development rights, and when avoidance of such lands is not practical, minimize the loss or conversion of agricultural lands by state-sponsored development actions.

5.8 - Preserve and maintain traditional working lands for the production of food and fiber, and support niche agricultural operations that enhance community food security throughout Connecticut.

Agricultural land having good road access so close to a regional center seems especially favorable for niche agricultural operations that could enhance community food security. Furthermore, even the limited current transit access to that land is better than what is available in many of the state's agricultural areas. The state and town should consider options for minimizing the conversion of such lands to uses that could also utilize other, previously developed areas in the region in a manner consistent with the state C&D Plan.

Response #6: The proposed use of the property is consistent with the City of Norwich 2013 Comprehensive Plan of Zoning as well as the recent City of Norwich 2023 Plan of Conservation & Development Strategic Elements (approved by the Commission on the City Plan August 2023 and effective September 2023). The property has been and continues to be designated as PPD and GC zoning districts which allow for commercial and industrial uses.

In addition, the City Council, acting in its role as the Zoning Commission, adopted a Business Master Plan District which "the City of Norwich recognizes that there exist properties located proximate to I-395 and the Taftville-Occum area of the City which represent important opportunities for economic growth and community development. There may also be other areas in the City which may be identified from time to time which present such opportunities." These three zones: BMPD, PPD and GC are in place to allow the City to capitalize on "important opportunities for economic growth and community development" in this area of the City.

Both the 2013 and the 2023 Comprehensive Plans address the entire City's agricultural assets. While the property in question was, in part, at one time, a farm, it has not been actively farmed in over 25 years. Examining the detailed agricultural and potential development plans in the 2023 Plan of Conservation & Development Strategic Elements demonstrate that the City, in adopting these two plans in the last ten years excluded the property from its agricultural inventory as it recognized the need to balance conservation of agricultural land with the need to attract new businesses to underwrite real estate taxes, personal property taxes and utility revenue to reduce the cost of the municipal government on the citizens of the City and provide a catalyst for employment opportunities.

A review of both agricultural soils and historic/current agricultural practices on the Project Site, as well as the Project's consistency with relevant policies of the State's Conservation and Development Plan (C&D Plan) are provided in this Environmental Review Checklist.

CONCLUSION

After examining the potential environmental impacts and reviewing all the comments that were received during the Public Scoping Period, and upon consultation with the CT OPM, CT DECD has concluded that the preparation of an Environmental Impact Evaluation (EIE) will not be required for the Occum Industrial Center (OIC) Roadway Project. Publication of this Environmental Review Checklist document to the CT Environmental Monitor shall satisfy the agency's responsibility under Section 22a-1a-7 of the RCSA.