OPM - Responses

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.

Norwich has one significant business park which is currently running at about ninety (90%) percent capacity and has no physical room to grow. Most of the buildings were erected in the 1980's and 1990's 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) square feet 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 market 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 of 8-30g work force housing which is providing a much-needed boost to that income segment.

A review of existing socioeconomic and demographic conditions in the region, as applicable, and the Project's impact on those resources, will be addressed in the Joint EA/EIE.

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?

The arterial roadway design incorporates all of the required wet and dry utilities to service the proposed industrial lots. Ongoing coordination with Norwich Public Utilities has resulted in the development of a plan for supplying Occum Industrial Center. This plan, including a summary of sources of funding for the extension of public utilities, will be discussed in the Joint EA/EIE.

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 first proposed roundabout. 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 Occum Industrial Center. Based upon their projections, it is anticipated that initial users will be on board concurrent with the physical construction of the initial phase.

A review of existing and proposed public utilities, as well as a review of existing roadway conditions and the Project's potential effects on proximal roadways, will be discussed in the Joint EA/EIE document. Future development of the Occum Industrial Center (i.e., indirect and cumulative impacts with respect to the same) will be addressed in the Joint EA/EIE. However, it is noted that future development of Occum Industrial Center falls under the purview of NCDC and is not the subject of the Joint EA/EIE itself.

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 offramps 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?

The Project involves the construction of two proposed roundabouts. The easterly roundabout 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 CEPA/NEPA review process.

The westerly roundabout 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 Item 5 below) included as part of the design which will protect pedestrian and bicyclists.. Cross walks will be installed at the intersection of the proposed roadway (Occum Way) and Canterbury Turnpike on the north side of the proposed westerly roundabout.

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.

As indicated above, a review of existing roadway conditions and the Project's potential effects on proximal roadways as well as area bicyclists and pedestrians, will be discussed in the Joint EA/EIE document.

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?

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 Occum Industrial Center 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 Occum Industrial Center.

A review of the area's existing public transit resources, as well as potential impacts to these resources as a result of the Project, will be pursued in the Joint EA/EIE.

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?

The proposed multi-use trail is being constructed to comply with the requirement of the City'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, 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.

A review of the proposed multi-use trail will be pursued in the Joint EA/EIE.

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.

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 Interstate 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." It is commercial nature of the existing and proposed zoning designations. 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), will be pursued in the Joint EA/EIE.

DEEP - Responses

Norwich Business Park North NEPA/CEPA
10/04/2023

The following input is offered to guide the development of responses to Linda Brunza's (CTDEEP) comment letter dated 8/31/2023 relative to Public Scoping for the Norwich Business Park North Project's CEPA/NEPA compliance documentation. CTDEEP comments were not individually numbered, but rather categorized. Therefore, suggested input is organized by these categories below.

1. **CT DEEP commentary related to Corps Permitting and Stormwater Permitting**

Matrix Input: *CTDEEP is offering guidance regarding the permits that may be applicable to this project. A section in the CEPA EIE will be prepared that lists the permits that are anticipated for this project. These permits do not have to be obtained prior to CEPA approval, rather that takes place after the CEPA process has concluded – typically during the 60-90% design phase.*

CTDEEP should have been made aware that this project received a Local IWWC permit back in June 2022 as 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. CTDECD funding for the project occurred in April 2023. The involvement of CT DECD funding is what triggered the need for CEPA compliance. Agreed that a Corps Section 404 permit will be required for this project as federal wetlands are being impacted by the project. Agreed that a General Permit for Stormwater and Dewatering Wastewaters from Construction Activities will be required for the project as project disturbance is greater than 1-acre. These permits will be noted as being required in the CEPA document list of permits section.

2. **Remediation Division**

Matrix Input: *CTDEEP's Remediation Division is alerting us to their preliminary findings regarding potential contaminated properties or areas of environmental concern located within or adjacent to the project site. They are also directing us to where we can find information related to Best Management Practices (BMPs). We will incorporate this information as appropriate into the CEPA document. It is also important to note that a Phase I Environmental Site Assessment (ESA) was conducted for this project in support of the local inland wetland permit application and was also supplied to CTDECD – as part of the Community Investment Fund (CIF) application as an attachment. That Phase I ESA*

concluded that there were no significant concerns other than a potential need to conduct some additional testing near the old farmhouse prior to its demolition. That should be the extent of our response to this comment.

3. **Fisheries Division**

Matrix Input: *CTDEEP's Fisheries Division is alerting us regarding existing fisheries habitat and species in Byron Brook and what steps should be followed as the project heads into permitting. This fisheries coordination may have already occurred as part of the local IWWC permitting, and if not, should take place during any future permitting steps that occur after NEPA/CEPA approvals (Corps Wetland Permitting).*

4. **Watersheds Program**

Matrix Input: *CTDEEP's Watershed Program is alerting us to some of the water quality issues that need to be evaluated and discussed in the CEPA document. There is no need to respond other than to acknowledge their concerns which provide focus to our CEPA impact analysis. These concerns will be addressed and documented accordingly.*

5. **Air Management Bureau**

Matrix Input: *This is typical language that is included in CEPA documents, specifically within the construction impacts section. There is no need to respond other than acknowledging the comments and assuring CTDEEP that these air quality protection recommendations will be considered and incorporated in the CEPA document as appropriate. We should also state that the development is included in the most recent 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 February 2022* ***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.***

7. **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**

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