



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

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*Executive Director*

October 22, 2025

Michael T. Looney  
Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106  
[Michael.Looney@ct.gov](mailto:Michael.Looney@ct.gov)

Re: Environmental Impact Evaluation (EIE) for a Regional Composting Facility and Recycling Infrastructure, Manchester

Dear Michael Looney,

The Council on Environmental Quality (Council) provides the following comments regarding the EIE for a regional composting facility in Manchester.

The Department of Energy and Environmental Protection (DEEP) proposes to provide funds, through the Materials Management Infrastructure (MMI) Grant Program to the Town of Manchester to divert wastes from the municipal solid waste (MSW) stream. The Town of Manchester is seeking to develop a food scraps collection and processing facility and an associated aerated static pile (ASP) composting facility with the capacity to accept, process, and transfer 10,000 to 15,000 tons of food waste annually at the preferred location at 263 Olcott Street in Manchester.

The EIE states that “acquisition of an adjacent approximately 5 acre parcel is key to locating these operations at the preferred location.” However, it is unclear from the analysis in the EIE and the facilities’ maps on pages 4 and 5 of the EIE where the five-acre parcel is located and whether the assessment of direct, indirect and cumulative impacts for the proposed action includes the adjacent five-acre parcel. The EIE also states that “the acquisition of this adjacent parcel is under negotiation and is outside the funded program components of the MMI Grant award.” However, since the acquisition of the five-acre parcel is “key” to locating the proposed operations, such acquisition could be considered “an interdependent part of a sequence of planned activities which may have a significant environmental effect.”<sup>1</sup> If so, the provision of additional information regarding the five-acre parcel including, but not limited to, the location, use, infrastructure requirements, and an assessment of the direct, indirect, and cumulative environmental impacts would be appropriate.

In addition, the EIE includes two references to “approximately 5.5 acres” that would be affected by soil/site-disturbing activities for the development of the proposed facility. However, it is unclear why so much soil/site disturbance would be required since the EIE also states that “the estimated size requirements for this composting facility are 0.75 acres”, and “the Town intends to repurpose an existing salt storage structure into a facility to receive and process the food wastes.”

#### Noise

The EIE states that the noise ordinance for the Town of Manchester “establishes that for an industrial use located in an industrial zone emitting noise where the receptor of the noise is

located in a residential zone, a maximum dBA of 61 would be permitted during daytime hours and a maximum of 51 dBA would be permitted during nighttime hours.” The EIE notes that the noise level expected to be generated by operation of the proposed facility would be 62.1 dBA, which would exceed the Town’s noise ordinance for both daytime and nighttime operation at adjacent noise zones. In section 4.14 (Mitigation Measures for Potential Adverse Impacts), the mitigation measure identified to address the expected exceedance of the Town’s noise ordinance includes a statement that “the Town should require the inclusion of sufficient building and site noise mitigation measures to reduce noise by at least 1.1 dBA during the daytime hours, and “if the facility is planned for 24 hour per day use, the inclusion of sufficient building and site noise mitigation measures to reduce noise by at least 11.1 dBA should be required.” The provision of additional information that describes the type of “building and site noise mitigation measures” that would be employed at the proposed facility, and if such measures could reduce the calculated operational noise levels to comply with the Town’s noise ordinance would be helpful.

### **Flood Hazard**

The EIE notes that the Federal Emergency Management Agency (FEMA) Q3 flood zone data indicates that a portion of the site for the proposed action intersects with an AE Zone designation, which “identifies an area as a high-risk flood zone subject to inundation by the 1% annual chance flood (100-year floodplain) with a specific Base Flood Elevation (BFE) identified.” The EIE also states that “the area of the site in question is on the north side of the existing DPW salt barn, which is one of two possible locations for the project’s proposed aerated static pile (ASP) composting operation.” While this statement might refer to the area with a BFE of 85 feet, a review of the FEMA flood map (number 09003C0393F) indicates that the AE designation might extend around the north, east and south sides of the site of the proposed action. And since precipitation and/or the severity of precipitation events are expected to increase in the future due to climate change, a description of potential mitigation measures, if any, and an assessment of the “effect of a changing climate on the action, including any resiliency measures incorporated into the action”<sup>2</sup> would be appropriate.

While the EIE includes some quantitative information, such as greenhouse gas emissions and noise, the provision of more quantitative data could better assist the public and other individuals to independently evaluate the potential direct, indirect, and cumulative effects to environmental and community resources listed in the RCSA, Section 22a-1a-3(b). The Council also notes that 1) several maps within the EIE fail to depict the location of the proposed facility including, but not limited to, the Town of Manchester’s Conservation & Growth Map, the 2024 Capitol Region Council of Governments Regional Plan of Conservation and Development Land Use Policy Map, the 2025-2030 Locational Guide Map, etc.; and 2) the FEMA Flood Hazard map on page 21 is illegible, which might make it difficult for members of the public and other individuals to independently evaluate that information.<sup>3</sup>

As identified in the Council’s 2024 annual Report, *Environmental Quality in Connecticut*, the Council recommended reducing solid waste and increasing the diversion of solid waste to reduce ozone and greenhouse gas (GHG) emissions.

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

Sincerely,



Paul Aresta Executive Director

<sup>1</sup> Regulations of Connecticut State Agencies (RCSA), Section 22a-1a-8 (c) “If an agency is proposing an action which is an interdependent part of a sequence of planned activities which may have a significant environmental effect and which depends on the entire sequence for its justification, or which is part of a program of similar activities, the cumulative effect of which may have a significant environmental effect, a single environmental impact evaluation shall be prepared for that sequence or program.”

<sup>2</sup> RCSA Section 22a-1a-3(b)(20)

<sup>3</sup> RCSA, Section 22a-1a-8(e) - (e) Environmental impact evaluations shall be prepared in a manner which will encourage clear presentation and independent evaluation of the action and its reasonable alternatives. Summary technical data, maps and diagrams should be presented as to be understandable to the general public.