

To: Mithila Chakraborty, Ph.D.
From: Linda Brunza
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Date: 8/20/2025

Subject: Notice of Scoping for The Homes at Avon Park, located at 20 Security Drive 1B, Avon CT.

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the redevelopment of an 11.23-acre portion of an office park located in the center of Avon, CT. Phases 1 and 2 will involve the new construction of 100 units of residential housing on a surface parking lot, which abuts a vacant mid-century office building. Some interior demolition is anticipated as part of Phase 3. Improvements will include the creation of one- and two-bedroom units; common amenities including community room and kitchen, fitness and wellness, walking trails, lawns, gardens, playground, outdoor courtyard, and paved terrace, basketball court and dog runs. Environmental testing revealed the existence of asbestos containing materials in bathroom mirror glue and roofing materials, to be abated as part of Phase 3. The project is getting reviewed for 9% and 4% Low Income Housing Tax Credit funding by DOH.

The following comments are submitted in response to the scoping requirements of the [Connecticut Environmental Policy Act](#). Scoping is the gathering and analysis of information that a state agency will use to establish the scope of environmental review of a proposed project. Scoping is done in the early stages of a project and DEEP is a commenting agency. Contact information is included as well as any necessary links to DEEP's webpages.

1. Effect on water quality, including surface water and groundwater.

Melissa Fahnestock, Water Planning and Management Division, Melissa.Fahnestock@ct.gov

The project for The Homes at Avon Park in Avon is partially located in Avon Water Company's Well 2 Aquifer Protection Area as shown on the [Aquifer Protection Area Interactive Map](#).

The proposed redevelopment of an 11.23-acre portion of an office park is a land use that is not regulated by the Aquifer Protection Area Program. However, it is recommended that the developer is aware of the location in the aquifer protection area and implement Best Management Practices (BMPs) and take precautions to protect this sensitive drinking water area. BMPs from the [Connecticut's Aquifer Protection Area Program Municipal Manual](#) entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas can be found in the [Appendices of the Municipal Manual](#).

Additional stormwater management measures must be in place to prevent contaminated stormwater discharges/releases to the ground, apply stormwater discharge and treatment measures that protect groundwater quality, and encourage safe recharge of stormwater where it does not endanger groundwater quality. Additional management measures include: prevent illicit discharges to stormwater discharged to the ground and discharge paved surface runoff to aboveground type land treatment structures – surface drains, sheet flow, surface swales, depressed grass islands, detention/retention and infiltration basins and wet basins (these measures take advantage of natural treatment processes in soil and vegetation before discharge to the groundwater and promote natural aquifer recharge). Any catch basins that are installed should have deep sumps to trap sediments and hoods to trap oil and grease. Please see the Instructions for Developing a Stormwater Management Plan and Aquifer Protection Stormwater Management Plan Supplement in the "Guidance" section at the bottom of the [Aquifer Protection Area Businesses and Industry Information](#) page.

It is recommended that the developer create a map of the proposed project work area with the Aquifer Protection Area overlay and use this map in their planning, construction plans, permit applications, and any public outreach materials they use and distribute. The project map with the Aquifer Protection Area outline and the parcel boundary should be shared during their virtual public scoping meeting. For more maps and GIS shapefiles, go to <https://portal.ct.gov/DEEP/Aquifer-Protection-and-Groundwater/Aquifer-Protection/Aquifer-Protection-Area-Maps>.

Doug Hoskins, Water Planning and Management Division, douglas.hoskins@ct.gov

The proposed project is located within Avon Water Company's service area, so public water supply should be available for the development site if needed. Otherwise, it is unlikely that the site will require more than 50,000 gallons of water per day, the jurisdictional threshold of the Water Diversion Program.

2. Effect on flooding, in-stream flows, erosion, or sedimentation.

Susan Jacobson, Land and Water Resources Division, Susan.jacobson@ct.gov

Flood Management Certification: If proposed activities are being funded or conducted by a state agency AND are being conducted within a FEMA designated floodplain, the applicant should consult with the DEEP's Land and Water Resources Division for information on how to comply with the States Flood Management Statutes and Regulations. For information on identifying if the site is in a flood zone, please see FEMA's website: [FEMA Flood Map Service Center](#). For information on Flood Management Certification, please see DEEP's website: [Flood Management Certification Fact Sheet](#).

3. 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.

No staff comments were received. A review of the site determined it is not in a Natural Diversity Data Base Area.

4. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment.

No comments received.

5. A substantial increase in the type or rate of energy use as a direct or indirect result of the action.

No comments received.

6. Effect on air quality.

No comments received.

7. Effect on existing land resources and landscapes, including coastal and inland wetlands.

Danielle Missell, LWRD, Danielle.Missell@ct.gov

If wetlands are preset and proposed to be filled state permits may be required.

8. Adequacy of existing or proposed utilities and infrastructure.

No comments received.

9. Effect on greenhouse gas emissions as a direct or indirect result of the action.

No comments received.

10. Effect of a changing climate on the action, including any resiliency measures incorporated into the action.

No comments received.

11. Additional Comments/ Concerns:

No additional comments

List of permits:

Federal Section 404 Clean Water Act, Inland, Water Quality Certification (WQC)

☐ Required for this project.

☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. Wetlands and Watercourses should be clearly field delineated by a qualified soil scientist. If work is being proposed in a wetland or watercourse (crossings, fill, structures, culverts etc.), contact the [Army Corps of Engineers](#) to determine if it is within their jurisdiction.

☐ Not required.

State 401 Water Quality Permit

- ☐ Required. (if a federal 404 WQC is required, a state 401 is also required because the programs are tied together)
- ☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. For a pre-application meeting, contact: Susan.jacobson@ct.gov (for projects in towns that are west of the CT River) or Darcy.winther@ct.gov (for projects in towns that are on the CT River or east of the river).
- ☐ Not required.

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP). Note: Without detailed plans, several options might be checked, please review these options to determine which is applicable for the project.

- ☒ If between one and five acres of disturbance and approved at the local level, not required to register with DEEP.
- ☒ If five or more acres of disturbance and approved at the local level, must complete registration form and Stormwater Pollution Control Plan to DEEP at least 60 days prior to the initiation of construction. Registrations shall include a certification by the Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. For further information, contact the division at 860-424-3025 or DEEP.StormwaterStaff@ct.gov
- ☐ Projects exempt from local permitting (conducted by government authorities) disturbing over one acre must submit a registration form and Stormwater Pollution Control Plan to DEEP at least 60-90 days, as identified by the permit, prior to initiating construction.

The Construction Stormwater General Permit registrations must be filed electronically through [DEEP's ezFile Portal](#). Additional information can be found online at: [Construction Stormwater GP](#).

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Eric Hammerling, Office Director, DEEP/ERSI