



To: Mithila Chakraborty, Ph.D., Department of Housing
From: Jordan.DiDomenico
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Email: Linda.Brunza@ct.gov

Date: 9/5/2024

Subject: Scoping for Homes with Hope, 122 Wilton Road, Westport

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the housing development at 122 Wilton Road in Westport. The development will contain 19 units and provide permanent housing for homeless and low-income individuals.

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 planning 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 proposed construction site is not located in a parcel prioritized for source water protection as shown on the [Parcel Prioritization for Source Water Protection Viewer](#), indicating that the property is not in a surface water or groundwater protection area. However, the site is located in an area of coarse-grained deposits with a thickness of 0-50 feet per the [CT Surficial Aquifer Potential Map](#) and has the potential for water supply development. Also, while the proposed site is not in an [Aquifer Protection Area](#), the northern portion of the site is in close proximity to Aquarion's Canal Street APA. The proposed construction of a new housing development is a land use that is not regulated by the APA program. However, it is recommended that the construction company is aware of the nearby aquifer protection area and implement Best Management Practices (BMPs) from the [Connecticut's Aquifer Protection Area Program Municipal Manual](#) entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas found in [Section 14.4.8 of the Appendices of the Municipal Manual](#). It is recommended that the construction company 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. We recommend the project map with the Aquifer Protection Area outline 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>.

Melissa Mostowy, Water Planning and Management Division, melissa.mostowy@ct.gov

Most of the Town of Westport, including the subject site, is serviced by Aquarion Water Company. It is unlikely that new sources for drinking water will need to be developed to serve the needs of the proposed project. Regardless of the public water supply availability, it is unlikely that the proposed demand will cause the system to exceed the usage of 50,000 gallons per day, the jurisdictional threshold for the Diversion Program. No water diversion permit will be required.

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 the 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.

Bruce Williams, Fisheries Division HCE Program, Bruce.Williams@ct.gov

No impacts to fisheries resources are expected and no further consultation with Fisheries is required.

Robin Blum, Wildlife Division, NDDDB Program, robin.blum@ct.gov

An NDDDB Determination was issued on 07/29/2024 addressing impacts to state listed species. This determination does not address potential impacts to species that are not state-listed.

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, Land and Water Resources Division (LWRD), Danielle.Missell@ct.gov

The site is within the coastal boundary (Coastal Management Area). The site is adjacent to and may overlap with the 100-year flood zone and tidal wetlands of the Saugatuck River. If any work is to be conducted in these areas at the east end of the site, they should contact LWRD for permitting requirements. Any fill in these wetlands would also require federal Section 404 permitting through the Army Corps of Engineers.

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:

Kevin Neary, Remediation Division, Kevin.Neary@ct.gov.

The Remediation Division has no records or projects for 122 Wilton Rd.

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.

The following permitting options are included once the acreage of the disturbance has been finalized:

- 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