



To: Mithila Chakraborty, Ph.D., Department of Housing
From: Jordan DiDomenico
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Date: 6/21/2024

Subject: Scoping Notice for St. Edmunds Retreat – Septic System Repairs

The Department of Energy & Environmental Protection (DEEP) has received the Notice of Scoping for septic system work at St. Edmunds Retreat, located at 1 Enders Island in Stonington. The work will include the repair and replacement of the sub-surface sewage disposal systems for one new mixed-use building and 5 existing mixed-use buildings with public water and private septic. The purpose of the proposal is to update the existing septic systems to include a modern, more efficient leaching system to reduce potential environmental contamination as a part of a multi-year program to update and improve the existing buildings and infrastructure on Enders Island.

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:

There are no concerns related to the Aquifer Protection Area Program.

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

There are no concerns related to the Water Diversion Program.

Marlene Krajewski, Water Planning and Management Division, Marlene.Krajewski@ct.gov:

In general, the Watershed Program of the Water Planning and Management Division is in support of projects that replace aging septic systems, as failing or malfunctioning septic systems are a major contributor to nonpoint source (NPS) pollution.

The project description discusses reduction of environmental contaminants such as biochemical oxygen demand (BOD), nitrogen, and suspended solids; however, bacteria levels aren't listed. The Watershed Program would like to see bacteria levels considered, if they haven't already been.

The estuary (Waterbody Segment ID: CT-E2_004) surrounding Enders Island is identified as an impaired waterbody for shellfish harvesting due to elevated bacteria levels, for which there is a pollutant reduction analysis for bacteria (total maximum daily load). The potential for the system being impacted by storm surge raises, rising water table, and being in a flood prone area raise additional concerns that this system may malfunction and contribute to any further pollution of the estuary. If there is any additional information on the technologies being used to reduce nitrogen (and/or bacteria), this may be of interest to the Watershed Program.

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

No comments submitted at this time.

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.

Robin Blum – Wildlife Division, Natural Diversity Database Program, Robin.Blum@ct.gov:

A Natural Diversity Data Base (NDDDB) review was conducted in November 2023. The resulting determination found that no negative impacts to populations of Federal or State Endangered, Threatened or Special Concern Species are expected from the proposed project. Please note that comments from the NDDDB Program are limited to plant and wildlife species that are listed as endangered, threatened, or special concern, and do not include non-listed plant and wildlife species.

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

No work is proposed in or near any waterbodies, therefore no impacts to fisheries resources are expected and no further consultation with the Fisheries Division is required.

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

Allison Forrest-Laiuppa, Emergency Response and Spill Prevention Division, Allison.Forrest-Laiuppa@ct.gov:

DEEP received an underground storage tank (UST) [removal report](#) for a 1,000-gallon heating fuel UST removed in 2022. One soil sample was collected from the UST grave for extractable total petroleum hydrocarbons (ETPH), which was below the Remediation Standard Regulations (RSRs).

The PCB Program has no records for this address.

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

No comments submitted at this time.

6. Effect on air quality.

No comments submitted at this time.

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

Danielle Missell, Land and Water Resources Division, Danielle.Missell@ct.gov:

It appears that there are no inland wetlands on the site. If work is proposed to be conducted in a tidal wetland or at or below the Coastal Jurisdiction Line (2.0' in Stonington) contact the LWRD for permitting requirements. [Coastal Jurisdiction Line Fact Sheet](#)

8. Adequacy of existing or proposed utilities and infrastructure.

No comments submitted at this time.

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

No comments submitted at this time.

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

No comments submitted at this time.

11. Additional Comments/ Concerns:

No comments submitted at this time.

List of permits:

Federal Section 404 Clean Water Act, Water Quality Permit

- ☐ Required for this project.
- ☒ May be required for this project. Contact the [Army Corps of Engineers](#) to determine jurisdiction.
- ☐ Not required.

State 401 Water Quality Permit

- ☐ Required (necessary for state approval when a Federal 404 is required)
- ☐ May be required, contact Land and Water Resources Division, or request a pre-application meeting.
- ☒ May be required, unable to state with information provided at this stage.
- ☐ 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