



To: Mithila Chakraborty, DOH
From: Linda Brunza
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Date: 6/28/2024

Subject: Scoping Notice for Hanover Street Residences at 344, 350, and 354 Hanover Street, Bridgeport.

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping from the Department of Housing for a nine-unit affordable housing development for low-income families in Bridgeport. The combined site area is 0.21 acres. Each unit will have three bedrooms with one ADA compliant unit. Buildings will utilize EnergyStar heating/cooling and appliances as well as solar arrays on roofing to supplement energy demand.

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

The entire City of Bridgeport is serviced by the Aquarion Water Company, and it is unlikely that a new source will need to be developed to supply these residences. 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.

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

No concerns related to the Aquifer Protection Area Program.

Emma Coffey, Water Planning and Management Division, Emma.Coffey@ct.gov

The proposed site development lies north of the Cedar Creek Reach within Cedar Creek Harbor. This is an impaired waterbody with a [Total Maximum Daily Load \(TMDL\)](#) not supporting aquatic life, shellfish, and recreation. The TMDL indicates waterbody segments “exceed the water quality standards for fecal coliform during wet weather, which indicates that stormwater runoff is likely contributing to the bacterial concentration in the Bridgeport Estuary”. To reduce further

impairment of this waterbody, CT DEEP recommends the use of Green Infrastructure throughout the development to reduce the impact of polluted stormwater from reaching receiving waters. To minimize the water quality impacts of the development, proper management measures for stormwater and sediment should be taken.

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

No comments 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.

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 Fisheries is required.

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

No impacts to listed species are anticipated and no further consultation with the Natural Diversity Database 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.

No comments at this time.

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

No comments at this time.

6. Effect on air quality.

The following comments are not specific to the project but are general recommendations from the Air Bureau. DEEP's Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits. Additionally,

Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

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 wetlands on site. If there is no fill proposed in wetlands no wetland permits are required.

8. Adequacy of existing or proposed utilities and infrastructure.

No comments at this time.

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

No comments at this time.

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

No comments at this time.

Additional Comments:

Allison Forrest-Laiuppa, ERSPD, allison.forrest-laiuppa@ct.gov.

Neither the Leaking UST Coordination Program nor PCB Program have records for this address.

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.
- Not required.

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP)

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