



To: Mithila Chakraborty, Ph.D., Department of Housing

From: Laschone P. Garrison

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Date: 10/1/2024

Subject: Scoping for Parcel B, a mixed-use residential development to be located at 0 Maple Street, Naugatuck

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for Parcel B, which is a proposed mixed-use, mixed-income residential development located at 0 Maple Street in Naugatuck. Parcel B is a proposed 180-unit, three-phase redevelopment of a former manufacturing site. Each phase will be approximately 60 units, with a mix of one and two bedrooms. The current site will be remediated prior to sale of the property, which will occur in phases. The entire site (for all 3 phases) is 7.75 acres and there are no existing structures aside from a pump house that will be demolished. Parcel B-Phase I development incorporates appropriate residential density and retail in a mixed-use format. The project location is in 500-year flood zone and currently under review for Flood Management Certification.

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 an [Aquifer Protection Area](#) nor is it 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 fines over coarse-grained deposits with a thickness of 50-100 feet per the [CT Surficial Aquifer Potential Map](#). Coarse-grained deposits of thickness greater than 50' are considered to have the greatest long term potential ground water yields and should be considered a future source area that should be protected. To ensure

protection of this future groundwater source, it is recommended that the construction company 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. This can be found in [Section 14.4.8 of the Appendices of the Municipal Manual](#).

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

The entirety of Naugatuck is within the Connecticut Water Company's Naugatuck Region-Central System exclusive service area. 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.

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

The Naugatuck River runs directly to the east of the project site, and Long Meadow Pond Brook, a tributary to the Naugatuck River, runs just to the south of the proposed project site. Both waterbodies are impaired, and there is a [Naugatuck River Regional Basin E. coli TMDL \(2008\)](#) due to Nonpoint Source (NPS) pollution from stormwater runoff and other unknown sources which covers both rivers. To reduce further impairment of these waterbodies, DEEP recommends incorporating the use of Green Infrastructure and/or Low Impact Development in this project to reduce the impact of polluted stormwater from reaching receiving surface 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.

Susan Jacobson Flood Management Certification Division, Susan.Jacobson@ct.gov :

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 comments submitted at this time.

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 submitted 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 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 :

The site does not appear to contain any wetlands. A wetlands permit would not be required unless fill is proposed in a wetland or watercourse.

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:

Sheila Gleason, Remediation Division, Sheila.Gleason@ct.gov :

This site is enrolled in the Brownfield Remediation & Revitalization Program (BRRP) and should continue remediation under that program.

Allison Forrest-Laiuppa, Corrective Action Division, Allison.Forrest-Laiuppa@ct.gov :

The DEEP's PCB Program's most recent record for this area is an EPA Approval for Areas 5 and 6 dated January 25, 2024. This work was approved to clean the PCBs in these two areas to <1ppm. There are no enforcement actions for this area with the PCB Program.

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
- ☒ 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