

ENVIRONMENTAL HEALTH AND DRINKING WATER BRANCH

VIA ELECTRONIC MAIL

June 29, 2026

Mithila Chakraborty, Ph.D.
Connecticut Department of Housing
505 Hudson Street
Hartford, CT 06106-7106

RE: Notice of Scoping for Hopp Brook Estates

Dear Dr. Chakraborty,

The Connecticut Department of Public Health (DPH) has reviewed the Notice of Scoping (Notice) for Hopp Brook Estates published in the [June 2, 2026 issue](#) of the Council on Environmental Quality (CEQ) *Environmental Monitor*.

According to the Notice, Hopp Brook Developers, LLC (Applicant) proposes to construct ninety-four (94) single family homes on 59 acres of land located at 22 Oakwood Drive in Beacon Falls, Connecticut in six phases over the course of four to five years (Project). The Notice states that each home will be approximately 1,900 square feet in size, have a one- or two-car garage, an individual septic system, and potable water supplied by an external public utility. The scope of work also includes development of two on-site detention ponds, private roads, and community recreation areas.

DPH reviewed¹ the approximately 65-acre parcel proposed for the Project location (Site) which indicated that the Site currently:

- Has less than 0.3% impervious cover;
- Is over 97% is forested, of which approximately 78.5% (52 acres) is core forest²;
- Features potential terrain and shallow-soil construction constraints, and that;
- Includes approximately 24 acres is within the watershed of the Hopp Brook Diversion (Diversion), a source of public drinking water supply for the South Central Connecticut Regional Water Authority (RWA) public water system.

Any manipulation of land within the Watershed has the potential to impact the quality and/or quantity of RWA's public water supply. Therefore, DPH provides the following comments to the Connecticut Department of Housing for consideration prior to Project finalization to ensure long-term protection of public drinking water.

Forested areas are the ideal land cover for drinking water source filtration and storage. Clearing of forested areas within the Watershed could present potential adverse impacts, including increased stormwater runoff, reduced natural filtration of contaminants, and destabilization of soils leading to contaminant mobility. Introduction of impervious surface areas, 94 subsurface septic systems, and stormwater infrastructure would significantly decrease the existing protective qualities of the Watershed and Diversion. As such, DPH recommends the Applicant consider alternatives that:

¹ University of Connecticut Center for Land Use and Education (UConn CLEAR) Source Water Protection Project - Parcel Prioritization for Source Water Protection: https://experience.arcgis.com/experience/36ca1e3c376444e6a60ad6899ec71da7/#data_s=id%3AdataSource_2-1851bd2862c-layer-93%3A1

² UConn Clear "core forest explained"; https://media.clear.uconn.edu/projects/landscape/v2/forestfrag/measuring/core_explained.htm

- Reduce the amount of land converted from forest, such as through fewer and/or larger building lots with mandatory forest buffers separating each lot;
- Minimize impervious cover and septic density, and;
- Avoid developing the most hydrologically sensitive portions of the Site.

DPH recommends that any environmental review conducted should at a minimum:

- Quantify the amount of forest and core forest that would be cleared, fragmented, or permanently converted by roads, house lots, septic systems, grading, and stormwater facilities;
- Address the loss of existing source-water-protection functions provided by the parcel's forest and core forest, including infiltration, filtration, runoff attenuation, slope stabilization, and reduction of pollutant transport;
- Quantify proposed post-development impervious cover and analyze how changes in runoff volume, pollutant loading, drainage timing and concentration will differ from pre-development and potentially impact the Watershed on a Site that is currently almost entirely forested and almost entirely pervious;
- Include a comprehensive evaluation of existing conditions and assess how proposed actions may affect the Watershed and/or Diversion, including tributaries, wetlands, drainageways, septic-related groundwater loading, stormwater runoff, and emergency overflows;
- Assess whether the proposed detention ponds and associated stormwater measures will provide adequate pretreatment, water quality treatment, flow attenuation, and long-term protection against erosion, scour, sediment transport, chloride loading, petroleum pollutants, and other residential runoff contaminants;
- Include a detailed analysis of cumulative impacts from the 94 proposed individual septic systems, including density, reserve areas, setbacks from wetlands and drainage features, cumulative nutrient and pathogen loading, long-term maintenance, and foreseeable failure scenarios;
- Evaluate whether the Site's shallow-soil and slope characteristics create additional siting, design, maintenance, or failure concerns for individual septic systems;
- Evaluate potential long-term residential pollutant sources within the Watershed, including fertilizer and pesticide use, pet waste, fuel and chemical storage, and winter maintenance chloride loading from private roads and driveways, and;
- As the Project will be built in six phases over approximately four to five years, address phasing-related watershed impacts, including whether interim construction conditions could leave portions of the Site exposed for extended periods, whether completed phases will rely on temporary stormwater controls before full buildout, and how erosion, sedimentation, pollutant risks, and long-term maintenance responsibilities will be managed between phases.

DPH recommends that the Applicant develop an Erosion and Sedimentation Control (ESC) plan consistent with the [Connecticut Guidelines for Soil Erosion & Sediment Control Guidelines](#)³. All ESC measures should be developed in consultation with the municipal inland wetlands commission, installed prior to disturbance, maintained throughout construction, kept in place until disturbed areas are fully stabilized, and inspected regularly and after significant precipitation events, with immediate corrective action where deficiencies are observed.

Stable vegetative cover should be installed over disturbed areas as soon as practicable. All grading and drainage features should preserve or enhance the Site's pollutant attenuation and infiltration capacity and avoid creating concentrated, erosive discharges toward or within the Watershed. Any dewatering associated with construction activities should be controlled, filtered, and discharged in a manner that prevents erosion and avoids direct discharge to sensitive drainage pathways.

³ Connecticut Guidelines for Soil Erosion & Sediment Control, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/sescg_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90

The stormwater system should be designed, constructed and maintained to direct runoff northwest and away from the Watershed boundary and in consistency with the [Connecticut Stormwater Manual](#)⁴. Pre-construction stormwater analysis should assess the long-term efficacy of the proposed stormwater infrastructure and controls, including the two detention ponds, and evaluate how those controls will function during phased construction and prior to full buildout.

DPH recommends that the Applicant develop an Operations and Maintenance (O&M) Plan for all stormwater and source water protection infrastructure at the Site, including detention ponds, pretreatment, conveyance, drainage and discharge components, and emergency overflow areas. At a minimum, the O&M Plan should:

- Establish routine inspection schedules during construction and long-term operation, including after significant precipitation events;
- Define sediment and debris removal thresholds;
- Vegetation and landscaping maintenance requirements;
- Establish repair and replacement triggers and required response timeframes;
- Require documentation of all inspections, maintenance, deficiencies, corrective actions, and repairs;
- Identify the responsible party or parties for implementation and enforcement, and;
- Include enforceable homeowners' association requirements for stormwater and septic system maintenance, fertilizer and pesticide use, winter road management, spill prevention and emergency response procedures, and any other measures necessary to protect the Watershed and Diversion over the life of the Project.

DPH recommends that the Applicant prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan for both construction and operation of the Proposed Project. At a minimum, the SPCC Plan should:

- Require refueling and equipment maintenance should occur only on impervious, contained surfaces;
- Require secondary containment for fuels, lubricants, transformer oils, and other hazardous materials;
- Require spill kits to be kept on-site and maintained, and all personnel should be trained in spill prevention and response procedures, and;
- Include notification of any hazardous chemical or petroleum product spills that may affect the Watershed to the RWA, Naugatuck Valley Health District (NVHD), DPH, and the Department of Energy and Environmental Protection (DEEP).

Coordination with RWA and the NVHD is essential before, during, and after construction. The Applicant should provide each with points of contact, a copy of final site plans, and reasonable access for observation during construction and phasing transitions. Following completion of the Project, RWA should be granted reasonable access to monitor and inspect the Site to ensure protection of this public water supply resource.

Thank you for the opportunity to review and provide comments on this Project. Should you have any questions, please contact Lisette Stone of my staff at Lisette.Stone@ct.gov.

Sincerely,



Lisa Michelly Morrissey, MPH
Deputy Commissioner

⁴ Connecticut Stormwater Quality Manual, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/swm_mar_2024.pdf?rev=1dafa8e03ca4ec98f5ec011d803f4dc&hash=A49802ED8F721C491C85776C3E77CF51