

To: JaCinta Frazier, Department of Housing
505 Hudson Street, Hartford CT 06106

From: Linda Brunza- Environmental Analyst

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Date: 8/2/2021

Email: Linda.Brunza@ct.gov

Subject: Avery Park Revitalization, Woodland Springs Phase 2

Staff at DEEP has reviewed the scoping notice for the proposed development of 79 single bedroom units of new housing for elderly and disabled residents on 87 West Stafford Road in Stafford, CT. This phase will construct two multi-story apartment buildings and cottage style apartments and designed with 100% ADA accessibility.

The following comments are submitted for your consideration.

Wildlife Division

The Wildlife Division reviewed the proposed project and provided NDDB Determination No. 202107973 on June 28, 2021. The letter included mitigation measures to protect wood turtles and site design recommendations such as utilizing curbs and fencing to deflect animals around high traffic areas and avoiding mimicking sandy nesting areas around culverts and bridges. In low traffic areas cape cod style curbing is recommended or no curbs to allow passage. Please refer to the Determination letter for construction timing restrictions and site management recommendations. For potential freshwater mussel protection, a list of protection measures was included in the Determination letter including maintaining a 100 ft vegetative buffer around waterways. Please address how these concerns will be managed in the post- scoping notice or Environmental Impact Evaluation if one is needed. Please contact Shannon Kearney with any questions at shannon.kearney@ctgov.

Inland Wetlands and Watercourses

The site map showed a potential future wetland crossing with either a bridge or long-span open arch culvert on the potential emergency access road. If this road is to be constructed, please coordinate permitting with the Land and Water Resources Division. Mitigation may be required for any impacts that cannot be avoided.

If the reconnaissance of the site by a certified soil scientist identifies regulated areas, they should be clearly delineated. Any activity within federally regulated wetland areas or watercourses at the site may require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Further information is available on-line at [Army Corps of Engineers, New England District](http://www.army.mil) or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. If a permit is required from the U.S. Army Corps of Engineers, a Water Quality Certificate will also be required from DEEP pursuant to section 401 of the Clean Water Act. For

further information, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available online at [401 Certification](#).

Water Diversion

The Stafford Springs proposal is outside of the public water supply area, according to GIS mapping. Between the two phases of this project, it is not likely that the project would exceed the 50,000 gallon per day threshold. No regulatory permit would be required for this development. If you have any questions, please contact Doug Hoskins at Douglas.Hoskins@ct.gov.

Air Management

DEEP 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 in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

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: Robert Hannon
Robin Blum