



U.S. Department of Housing and Urban  
Development

451 Seventh Street, SW  
Washington, DC 20410  
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## Environmental Assessment

### Project Information

**Project Name:** Avery Park Revitalization Initiative - Woodland Springs Phase 2

**Applicant/Grant Recipient:** Avery Park Phase II Limited Partnership

**Point of Contact:** Ann Marie Perrone Town of Stafford Housing Authority 91 West Street  
Stafford, CT 06076

**HUD Preparer:** Miguel Rivera, Department of Housing

**Consultant (if applicable):** Charles D. Brink, LEP Senior Project Manager GEI Consultants, Inc.  
455 Winding Brook Drive Glastonbury, CT 06033

**Direct Comments to Delaire, Hermia** [Hermia.Delaire@ct.gov](mailto:Hermia.Delaire@ct.gov) Program Manager CDBG - Sandy  
Disaster Recovery Program

**Does this project involve over 200 lots, dwelling units, or beds?**

Yes (Project requires approval from the Environmental Clearance Officer (ECO))

No

### Funding Information

Grant Number	HUD Program	Funding Amount
M-TBD-SG-09-0100	HOME Investment Partnership Program	\$1,900,000.00

**Estimated Total HUD Funded Amount:** \$1,900,000.00

**Estimated Total Project Cost (HUD and non-HUD funds):** \$17,796,183.00

**Project Location:** The project area is located at 55 Woodland Springs Drive, Stafford, CT and is bounded by Phase 1 Woodland Springs to the south, a solar array to the southwest, New England Central Railroad to the east, and undeveloped land to the north and west.

### **Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The development of the 17.32-acre portion of the Woodland Springs Site will include the construction of approximately 79 units of affordable housing for the elderly and disabled. Based on the construction plan, the proposed units will consist of 16 one-bedroom cottage-style homes and the remaining units will be located in a stand-alone three-floor apartment building. The apartment building will have elevators and one-bedroom units arranged along common hallways. The building layout will have an east and west wing joined by a common room. The size of the apartments ranges from 629-730 square feet. The cottage-style homes will be one-bedroom, 767 square foot units with traditional wood frame construction. They are arranged with two units per building. All units will come equipped with energy star appliances, additional safety railings in the bathrooms, handicap accessibility, and an emergency call button. This development will be located north of the Phase I development that created 79 affordable

housing units with the same breakdown of a one-bedroom apartment and cottage-style homes. Both phases of development are located within walking distance of commercial uses.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

Phase II Woodland Springs is the second phase of an affordable housing plan to provide more housing opportunities to the elderly and disabled residents in the Town of Stafford, CT, and surrounding areas.

The 2015-2025 Plan of Conservation and Development for the Town of Stafford identified the town falls below the 10 percent threshold required for exemption from the Affordable Housing Appeals Law and identified the housing program for economic growth known as the HOME Connecticut Program as an option to assist in the development of new homes for the elderly. Before the Phase 1 development in 2015, 71 affordable housing units were available to seniors and disabled residents. Based on current census information the population in the Town of Stafford is approximately 12,000, 17.4% of the population in town is over 65, and 10.1% under 65 are considered disabled. Phase I of the development created 79 affordable housing units and the intent for Phase II is to add 79 more, this will bring the total number of units in town to 229.

**Existing Conditions and Trends:**

In 2015 the Town of Stafford's Plan of Conservation and Development identified funding opportunities through the HOME Connecticut Program to assist with new, affordable housing construction for the elderly and disabled. A multi-phase affordable housing development plan was put into motion in 2015. Phase I began with the new construction of 79 units, a mix of apartment and cottage-style homes. All one-bedroom and single-floor living. Before this development, 71 affordable elderly restricted living units existed in the Town of Stafford. Based on the current census information the population in the Town of Stafford is approximately 12,000. 17.4% of residents are over the age of 65 and 10.1% are considered disabled under the age of 65.

55 Woodland Springs Drive, the location of Phase I and II developments is on 40.52 acres. The parcel was subdivided in 2020 into 23.20 acres, the location of Phase I and 17.32 acres of undeveloped land, and the proposed location of Phase II. The overall parcel was acquired by Avery Park Limited Partnership in 2015, a subsidiary of the Housing Authority of the Town of Stafford after it was subdivided and sold by Big Y Food Inc. has owned the now adjoining property at 67 West Stafford Road since 1986. The parcel has been utilized as commercial property since before Big Y's ownership. Located approximately ½ mile south of the site, State Route 190, is developed with multiple commercial properties along with a two-mile distance. Development has increased within the past five years with the addition of a Dollar General, Family Dollar, Aubuchon Hardware, Tractor Supply, and an Aqua Pump development in progress. Additionally, the Route 190 corridor also contains doctors' offices, restaurants, banks, and other commercial uses. North of the site is residential properties located along Orcutville Road.

### Historical Usage

The property at Woodland Springs has remained undeveloped since at least 1934 when historical aerial photographs began. A portion of the property was developed in 2015 during Phase 1 of the affordable housing development. The surrounding parcels have remained their current residential and commercial uses for over 50 years.

### Topography and Geology

The site generally slopes to the east with a difference in elevation of approximately 10 feet (10 feet to 20 feet) above mean sea level. A majority of the site is located between elevations 560-570 feet. According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS), the site is identified as primarily containing the Charlton – Chatfield complex. Charlton – Chatfield complex is a fine sandy loam deriving from coarse-loamy melt-out till derived from granite, gneiss, and/or schist. They are considered well-drained soils and are very stony, not considered prime farmland based on classification.

### Groundwater and Surface Water

According to the CTDEEP water quality classification (accessed through CT ECO on June 8, 2021), groundwater at the site is classified as GA, and surface water is classified as A. GA classified designated uses are existing private and potential public or private supplies of water suitable for drinking without treatment and base flow for hydraulically connected surface water bodies. Classified surface water designated uses are habitat for fish and other aquatic life and wildlife; potential drinking water supplies; recreation; navigation; and water supply for industry and agriculture.

### Contamination and Toxic Substances

A Phase 1 Environmental Site Assessment was conducted at the site in May 2015. Based on the investigation, Go Environmental did not identify any areas of concern on or around the property. The site has remained undeveloped land since at least 1934 when aerial imagery began. A new phase I was forwarded January 26, 2022

## Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

The record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate. Related Law and Authority Worksheets can be found - <https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is not located within 2,500 feet of the end of a civil airport runway or 15,000 feet of the end of a military airfield runway.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located within a coastal barrier resources system (U.S.FWS)
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project location is determined to be in an area of minimal flood hazard (FEMA FIRMetete, effective June 1, 1982, and exported June 7, 2021)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located in Stafford (Tolland County), which is currently in non-attainment for 8-hour ozone (2015 standard). The proposed action is the construction of 79 affordable housing units with 97 parking spaces. Additional traffic resulting from the construction will be minimal. Construction activities will include fuel-burning equipment, as well as heating, ventilation, and air conditioning equipment associated with building operations once

		<p>construction has been completed. The air emissions from this equipment are anticipated to be minor and will not significantly affect local or regional air quality. Potential construction air quality impacts can occur due to the use of diesel-powered construction vehicles. Diesel air emissions include carbon monoxide, hydrocarbons, nitrogen oxides, and particulate matter (PM10). Emissions from construction equipment are anticipated to be significantly less than the total emissions from other industrial and transportation sources.</p>
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The property is not located within a coastal boundary area.</p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>An ASTM Phase I ESA environmental investigation was conducted at the property in May 2015 on both parcels before the subdivision. A new report was completed in January 2022</p>
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The property is not located within an endangered species area according to the United States Fish and Wildlife Service. A request for CT Natural Diversity Data Base State Listed Species Review was submitted to identify protected state-listed species. Preliminary mapping does not show the project in a known NDDB area. This review was completed for Phase 1 of the project with the Wood Turtle being the only potential species on site. Any recommendations made by the CT Department of Environmental Energy and Protection will be adhered to. See comment.</p>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The site is not within the immediate vicinity of hazardous industrial operations handling fuel or chemicals of an explosive or flammable nature based on the Environmental Data Resources Inc. Report and visual search using Google Earth.</p>

<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The property does not include prime or unique farmland.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The property is not located within a 100-year flood plain.</p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The project site is not listed on the National Register of Historic Places (NRHP) or within a Historic District on the Town of Stafford Zoning Map; therefore, no adverse impacts to historical resources are anticipated as a result of the proposed project. A Project Notification Form was sent to the State Historic Preservation Office (SHPO). A Phase I archaeological survey was performed and identified four potentially significant archeological resources. A Phase II Intensive Archaeological Survey of these four resources was evaluated for their potential for inclusion on the NRHP. Although some artifacts were discovered during the survey, the SHPO concluded they were not eligible for listing on the NRHP and a no-effect determination was made. The Mashantucket Pequot Indian Tribe, Mohegan Tribe of Indians of Connecticut, Narragansett Indian Tribe are listed in HUD's TDAT (Tribal Directory Assessment Tool) database as having an interest in Hartford County. Project review requests were submitted to each Tribe on June 16, 2021. There has not been any communication from any of the tribes. The tribes typically only respond if there is interest.</p>
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The DNL Calculator was utilized to determine the 24-hour day-night reading for the New England Central railroad, located approximately 80 feet from the proposed development. Based on the information provided by Jeffrey Castle, New England Central Railroad General Manager, visual inspection of the railway, and utilization of</p>

		the HUD Noise Guidebook, a 59-decibel level was calculated. The site is not located within 1,000 ft. of a roadway.)
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The property is not located within a sole source aquifer area. Municipal sewer and water are available to the site.
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	There are delineated wetlands along the eastern boundary of the property however there is no activity proposed in the wetland boundary. A permit was obtained from the Town of Stafford Inland Wetland Commission for activity in the upland review area.
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project location is not within one mile of a Wild or Scenic River.
<b>Environmental Justice</b>  Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project does not pose an environmental justice concern based on a review of the other compliance factors in this project's total environmental review

**Environmental Assessment Factors** [Ref. 40 CFR 1508.8 &1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features, and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable, and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits or approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation, or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>Identified in the Town of Stafford's Plan of Conservation and Development was the need for more affordable housing to bring the percentage of units in town from 7.06% closer to 10%. The Housing Appeals Act defines an affordable housing set-aside development as "a development in which not less than thirty percent of the dwelling units will be conveyed by deeds containing covenants or restrictions which shall require that, for at least forty years after the initial occupation of the proposed development, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons and families pay thirty percent or less of their annual income, where such income is less than or equal to eighty percent of the median income". Connecticut General Statute 8-30g allows for an affordable housing development to be constructed in any zone if the town falls below the 10 percent threshold, as appropriate. Phase II Woodland Springs will be located in the Highway Business Zone, adjacent to Phase I. This parcel has been undeveloped since at least 1934. The site has a rural feeling yet maintains close access to nearby stores, restaurants, and other amenities. Abutting land uses consist of residential and commercial. Based on the demographics outlined in the current census information 17.4% of the population in town is over 65 and 10.1% under 65 are considered disabled. There are currently 150 total units in town for elderly housing, this development will add 79 units that are needed for an aging population. The Town of Stafford Planning and Zoning Commission deemed the location appropriate for the affordable housing development due to the abutment of a residential zone and homes.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>The site slopes from north to south ranging with a difference in elevation of approximately 10 feet (560 feet to 570 feet) above mean sea level. The Charlton-Chatfield complex is the predominant mapped soil type by NRCS Web Soil Survey (WSS). These soils are very rock/stony, well-drained fine sandy loams. There is a low potential for septic system suitability, however, the proposed development will be connected to the town sewer system. Stormwater and Erosion Construction activity is a potential source of stormwater and water quality impacts from erosion and sedimentation. Project construction will be subject to state and local erosion and sediment control requirements. The erodibility rating for the Charlton-Chatfield complex is considered to be moderate based on NRCS WSS.</p>
Hazards and Nuisances including Site Safety and Noise	2	<p>Environmental A Phase I Environmental Site Assessment (ESA) was performed for the project area in May 2015 by Go Environmental. Based on</p>



		<p>the information presented within the report, there were no areas of concern identified.</p> <p><b>Ambient Noise</b>  The U.S. Department of Housing and Urban Development (HUD) Noise Assessment Guidelines were followed since there is a railroad within 3,000 feet of the property The New England Central Railroad, carries railroad freight trains, is located approximately 80 feet from the closest proposed sensitive receptor (residential building) on the property. The railroad is the downslope of the adjacent proposed development. The DNL Calculator was utilized on June 14, 2021, to determine the 24-hour day-night reading for the New England Central railroad. Based on the information provided by Jeffrey Castle, New England Central Railroad General Manager, an inspection of the railway and utilization of the HUD Noise Guidebook, 59 DNL was calculated. The project location is not located within 1,000 ft. of a major roadway.</p> <p><b>Site-Generated Noise</b>  Construction activities may result in short-term noise, but will not increase long-term site-generated noise.</p>
Energy Consumption	1	The proposed project will incorporate modern, energy-efficient lighting, HVAC, and other building systems.
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	The proposed development is an affordable housing project for elderly residents already living in the town of Stafford or neighboring towns. Given the age demographic, it is not anticipated to create a need for more employment in the town. The project will result in some temporary construction-related jobs.
Demographic Character Changes, Displacement	1	<p><b>Demographics</b>  Stafford's racial makeup is 94.7% White, 0.9% Black, 1% Asian, and 3% 2 or More Races, with 3.5% being of Hispanic origin. 17.4% of residents are over 65 years old and 10.1% are living with a disability under the age of 65.</p> <p>The 2019 American Community Survey (ACS) data indicates that approximately 6.2% of the families within the Town of Stafford live below the poverty line. The proposed project will have a beneficial impact by providing quality affordable housing to elderly and disabled residents.</p> <p><b>Displacement</b> The proposed project consists of the construction of 79 housing units at the property. There will be no displacement as part of this phase of activities.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	The proposed 79 housing units are for elderly and disabled residents, resulting in little to no increase in the number of total school-aged children within the Town of Stafford. The majority of people moving into the new units are expected to relocate from other housing within the Town of Stafford; therefore the number of school-aged children, if any, throughout the town is anticipated to remain similar to existing levels.
Commercial Facilities	1	The proposed project is within a mile of multiple commercial facilities including a grocery store, restaurants, and doctor's offices. Businesses in the local area will benefit from the creation of a residential community nearby.
Health Care and Social Services	2	The majority of individuals/couples moving into the proposed housing units are expected to relocate from other housing within the Town of Stafford; therefore the increased demand on city-wide healthcare and social services is not expected to be significant.
Solid Waste Disposal / Recycling	2	The majority of individuals/couples moving into the proposed housing units are expected to relocate from other housing within the Town of Stafford; therefore the increased demand on town-wide solid waste disposal and recycling is not expected to be significant. Trash collection and recycling for rental units will be provided by USA Hauling and Recycling.
Waste Water / Sanitary Sewers	2	The project site is served by sanitary sewer owned by the Town of Stafford Water Pollution Control Authority. The proposed action will have a minor impact on the wastewater system. The town currently has one wastewater treatment facility located at 50 River Road, Stafford, CT. The proposed development is expected to average 11,850 gallons per day to the system and has already been approved by the Town of Stafford WPCA. The sanitary system existing within the current roadways is adequate to handle the projected development.
Water Supply	2	The project site is served by public water supplied by the Connecticut Water Company which has already approved the system connection.
Public Safety - Police, Fire and Emergency Medical	2	The majority of individuals/couples moving into the proposed housing units are expected to relocate from other areas within the Town of Stafford; therefore the

		increased demand on town public safety or emergency medical services is not expected to be significant.
Parks, Open Space, and Recreation	2	The Town of Stafford Public School complex, open to the public, contains baseball fields, softball fields, soccer fields, a football field, outdoor track, and multiple paved walking areas are located approximately 1.5 miles from the proposed project. Also located within 3 miles of the project are three different conservation/open space areas for passive recreation.
Transportation and Accessibility	2	The current property is within walking distance of a Big Y Supermarket. There is no public transportation in the Town of Stafford, however, the Senior Center offers bus service free of charge to doctor's appointments along within and out of town shopping for elderly residents.
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	Farmland Soils The project site does not contain Farmland Soils according to the NRCS Web Soil Survey (WSS) Water Resources There are no sole-source aquifers designated by the U. S. Environmental Protection Agency (EPA) within Stafford, CT.
Vegetation, Wildlife	2	The project site is not within endangered or threatened species habitat according to the U.S. Fish & Wildlife Service (FWS) (Attachment B). The project site is also not within a Connecticut Natural Diversity Data Base (NDDB) Area.
Other Factors		

**Cumulative Impact Analysis:**

*Identify below the cumulative impact on the environment that will result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.*

According to the Federal Council on Environmental Quality (CEQ) regulations, cumulative impacts represent the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of the agency (federal or non-federal) or person undertaking such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). To the extent reasonable and practical, this EA considered the combined effect of the Proposed Action and other ongoing and reasonably foreseeable actions occurring or proposed in the vicinity of the project site. The property has been undeveloped since at least 1934. Phase II Woodland Springs is the second phase to bring affordable housing, specifically for the elderly and disabled residents

of the Town of Stafford. The development is the second phase of three-part affordable housing plan. Phase III will consist of the enhancement and revitalization of an existing elderly housing complex. Phase II will aid in this future plan by providing temporary residence for the Phase III patrons while their units are being reconstructed. Given the lack of housing for the elderly and disabled in the Town of Stafford, this project will help alleviate this problem.

**Alternatives:**

*Identify below other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Include the benefits and adverse impacts to the environment of each alternative, and the reasons (e.g., economic, engineering, or others) for rejecting it.*

Phase II Woodland Springs is integral to the overall affordable housing development plan set forth by the Housing Authority of the Town of Stafford. The site was determined to be an ideal location in 2015 when Phase I was constructed due to the close proximity to town services yet still having a residential surrounding. Although the site is zoned Highway Business it has been undeveloped as far back as records indicate and bordering parcels to the north/northwest are residentially zoned. There were no alternative site locations available that would provide equivalent benefits, environmental impacts and yield the acreage for both phases of development. Alternative designs were discussed during the Planning and Zoning approval process and the final façade was approved by the commission based on Section 5.10.3 of the Town of Stafford Zoning Regulations.

**No Action Alternative:**

*Identify below the "no action" alternative, describing the most likely conditions expected to exist in the future in the absence of the implementation of any action.*

Under the "No-Action" Alternative, the proposed Phase II Woodland Springs development would not occur. The partially undeveloped lot would remain as such with a potential for a more intensive development given the current "Highway Business" zone. The main purpose of the project is relieving the overwhelming need for elderly affordable housing in the Town of Stafford.

The No-Action Alternative would therefore not meet the Housing Authority's purpose of providing additional elderly affordable housing for the residents in the Town of Stafford.

**Additional Studies Performed:**

**Additional Studies Performed:**

Go Environmental (2015), Phase I Environmental Site Assessment, The Big Y Trust, Subdivision of: 87 & 97 West Stafford Road and 3 Susan Drive Stafford Springs, Connecticut. May 2015.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

**Sources**

1. United States Department of Housing and Urban Development

(<http://portal.hud.gov/hudportal/HUD>)

2. United States Fish and Wildlife Service

([http://www.fws.gov/newengland/EndangeredSpec-Consultation\\_Project\\_Review.htm](http://www.fws.gov/newengland/EndangeredSpec-Consultation_Project_Review.htm))

3. United States Environmental Protection Agency

([http://www.epa.gov/region1/eco/drinkwater/pc\\_solesource\\_aquifer.html](http://www.epa.gov/region1/eco/drinkwater/pc_solesource_aquifer.html))

(<http://www2.epa.gov/ejscreen>)

4. Federal Emergency Management Agency (<https://msc.fema.gov>)

5. USA National Wild and Scenic Rivers (<http://www.rivers.gov/>)

6. Connecticut Department of Energy and Environmental Protection, 2014 Connecticut Environmental Conditions Online; prepared in cooperation with the University of Connecticut. Retrieved online from <http://ctecoapp1.uconn.edu/advancedviewer/>.

7. Rodgers, J., 1985, Bedrock Geological Map of Connecticut; CTDEP, Natural Resources Center, Connecticut Geological and Natural History Survey, in cooperation with the United States Department of the Interior, U.S. Geological Survey.

8. United States EPA

[http://www.epa.gov/region1/topics/air/sips/sips\\_ct.html](http://www.epa.gov/region1/topics/air/sips/sips_ct.html)

9. Connecticut Department of Economic and Community Development list of Environmental Justice Communities

[http://www.ct.gov/deep/cwp/view.asp?a=2688&Q=432364&deepNav\\_GID=1511](http://www.ct.gov/deep/cwp/view.asp?a=2688&Q=432364&deepNav_GID=1511)

#### **Field Inspection (Date and completed by):**

Site inspections completed by Emily Perko of GEI, June 16, 2021

#### **List of Sources, Agencies, and Persons Consulted:**

##### Agencies

1. Connecticut Commission on Culture and Tourism, Historic Preservation & Museum Division (State Historic Preservation Office)

2. Connecticut Department of Environmental Energy and Protection, Natural Diversity Database (Wildlife Division).

#### **List of Permits Obtained:**

*Provide a list of permits, reviews, and approvals that are required for project construction.*

##### Planning

##### Department/Inland Wetlands

Site Plan Town of Stafford Site is located within the upland review area based on the Town of Stafford's Inland Wetland and Watercourse Regulations. A permit was obtained

June 1, 2020, it was determined there will be no negative impact associated with the development.

Zoning Department Construction Town of Stafford Site is located within the Highway Business (HB). Zone. Site Plan Review at the Town of Stafford Zoning Department, public comments were accepted and the project was approved June 4, 2020

Building Department Construction Town of Stafford Inspections will be required on all buildings and structures. This includes building, electrical, plumbing, heating, air conditioning, fire protection sprinklers and extinguishing systems, refrigeration, and signs.

Stormwater and Dewatering Wastewaters from Construction Activities Stormwater Connecticut Department of Energy and Environmental Protection Required for disturbance of one or more total acres of land area on a site, regardless of project phasing.

**Public Outreach [24 CFR 50.23]:**

*Provide your FONSI/FOSI notice dissemination list. Also, describe any additional public meetings and hearings that were held as part of or were relevant to the environmental review.*

Public meetings were held in May and June of 2020 associated with Site Plan Review at the Town of Stafford Planning and Zoning Commission Meeting, where public comments were accepted. Additionally, a FONSI/RROF will be published per HUD guidelines.

**Summary of Findings and Conclusions:**

*Identify below the main points of analysis in the Environmental Assessment. The summary should include any potential impacts of the proposed project, both beneficial and potentially adverse. The summary must also discuss any changes to the proposal necessary to avoid significant impacts.*

The proposed Phase II Woodland Springs will provide affordable housing specifically for the elderly and disabled residents in the Town of Stafford. No negative impact to human health or the environment is anticipated as a result of this project. Based on the findings of the Statutory Checklist and the Environmental Assessment Factors Checklist, formal compliance steps or mitigation is not required in any of the categories.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
The project may significantly affect the quality of the human environment.

Preparer Signature:



Name/Title/Organization: Miguel Rivera/Program Manager/Community & Housing  
Development

Responsible Entity Agency Official Signature:



Date: 3/24/2022

Name/Title: Hermia Delaire, Program Manager/ CDBG - Sandy Disaster Recovery Program

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).