

STATE OF CONNECTICUT OFFICE OF POLICY AND MANAGEMENT

February 22, 2011

This is in response to the comments you submitted concerning the proposed transfer of the Seaside Regional Center.

As you are aware, the State is in the process of selling the former Seaside Regional Center (Seaside) which is located on Shore Road in Waterford and as such the Department of Public Works (DPW), in accordance with CGS 4b-47, placed the required public notice in the *Environmental Monitor* and the public was afforded the opportunity to comment upon the proposed transfer of this property.

No Identified State Reuse

In January 2008, the State solicited reuse proposals from State agencies for the Seaside property. One agency, the Department of Public Safety, did submit a reuse proposal to utilize a structure on the property; however, that request was denied by this office. The Department of Environmental Protection's (DEP) comments indicate that DEP is currently working with DPW to transfer a Conservation and Public Recreation Easement on the subject property to the DEP. When the property is sold, the easement would assure public access to the entire waterfront portion of the site in perpetuity.

Determination of Current Market Value

To determine the current market value of the Seaside property, DPW obtained two (2) independent appraisals. The \$8 million purchase price exceeds the current market value for the property as established by these appraisals.

Town of Waterford's Establishment of the Seaside Preservation Zoning District

Since the State does not establish local zoning, the type and density of any future development on the property will be subject to the local zoning laws which have been established, and will be enforced, by the Town of Waterford.

Public Access, Open Space and Recreation

Prior to disposition of the property, the Conservation and Public Recreation Easement will ensure public access to Long Island Sound for passive recreation in perpetuity. The easement area will include the entire length of waterfront, all land within the 500-year flood zone, some adjacent upland area and access from Shore Road. Dedicated public parking and appropriate signage will be provided. The DEP will determine allowed and prohibited uses within the easement area as well as hours of operation.

In addition, the Seaside Preservation Zoning District, Section 17a.11 of the Town's zoning regulations states that "All areas not approved for development as defined shall be set aside as permanent open space or recreation area in perpetuity to be held in common by the owners within the district.

Connecticut Environmental Policy Act

After granting of the easement, the property is being conveyed in "as is condition." Therefore, the transaction is not considered to be a state action that would trigger the preparation of an Environmental Impact Evaluation pursuant to CEPA.

Natural Resource Inventory

The conservation easement area, which includes the entire waterfront and most of an existing watercourse, will protect any significant ecological resources on the property. The balance of the property is essentially developed, with lawns and buildings.

Site Plan Approvals

With regard to site plan approvals, Section 17a.12 of the Town zoning regulations states that "A site plan shall be submitted to the Commission in accordance with the provisions of Section 22 of these regulations and the purpose of this district, and no building or structure, parking lot, or outdoor use of land shall be used, constructed, enlarged, or moved until said site plan has been approved by the Commission. The development shall be constructed in accordance with these Regulations and the site plan as approved by the Commission. Changes to the approved plans may be made, the extent of which shall be set forth in the special permit."

In addition, as part of local planning and zoning approvals, the Coastal Site Plan Review requirements of sections 22a-105 through 22a-110 of the Connecticut Coastal Management Act would be applicable.

Development & Design

The design of any development of Seaside will be guided by Section 17a.13 of the Town zoning regulations which states "The architectural and site design of all buildings and improvements within the Seaside Preservation District, including typical floor plans and building elevations drawn to scale showing the exterior materials and treatment to be used, shall be submitted. The Plan submission shall specifically show how the development will result in the preservation and re-use of the Main Building, Employee Building I, the Duplex and the Superintendent's House, how the principal use if to be primarily located in these buildings and how all new construction will be integrated into a cohesive and unified development plan. The development shall be constructed in accordance with these design plans and the special permit shall specify the manner in which any changes to the design elements may be made."

Department of Public Works Request for Proposal (RFP) Process

The RFP for the sale of Seaside was conducted by the DPW and the disclosure of any information concerning the RFP process at this time shall be subject to applicable State law or regulation.

Council on Environmental Quality

Requests related to suggested actions which should be undertaken by the Council on Environmental Quality (CEQ) should be sent directly to CEQ which can be reached at (860) 424-4000 or www.ct.gov/ceq

Subdivision of the Property

With regard to suggestions that the Seaside property be subdivided; it is the State's intent and desire to sell the Seaside property as a single parcel.

Harkness Memorial State Park

Comments concerning the operation of Harkness Memorial State Park should be directed to the Department of Environmental Protection (DEP). DEP can be reached at (860) 424-3000 or www.ct.gov/dep

Leasing of the Property

It is the intent and desire of the State to sell the Seaside property.

Public Informational Meetings

The disposition of the Seaside property is being conducted by the DPW in accordance with all applicable statutes, including Connecticut General Statute 4b-21 which does not include a public informational meeting requirement.

Alternative Proposals

With regard to suggestions for various alternative proposals; as the DPW's RFP process has concluded no alternative proposals are being solicited.

Sincerely,

Benjamin Barnes

Secretary

O'Brien, Patrick M.

From: Sent: saintrobert [saintrobert@comcast.net] Friday, June 04, 2010 10:16 AM

To: Cc: O'Brien, Patrick M.

Subject:
Attachments:

Kathy Jacques; David Bingham; Kopetz, Kevin Re: Sale of Seaside Regional Center; Comments Urban Sprawl Leaves Its PAH Signature.pdf

Here is the attachment to our letter.

Robert Fromer

— Original Message — From: O'Brien, Patrick M.

To: 'saintrobert'
Cc: Kopetz, Kevin

Sent: Friday, June 04, 2010 10:00 AM

Subject: RE: Sale of Seaside Regional Center; Comments

Mr. Fromer,

We have received your comments concerning the proposed transfer of the Seaside Regional Center in Waterford. The attachments are somewhat blurred so if you could mail a hard copy I would appreciate it; my mailing address is below.

The public comment period regarding the proposed transfer of Seaside ends on June 17th; at that time, and in accordance with Connecticut General Statute 4b-47, the Office of Policy and Management, in consultation with the Department of Environmental Protection, will respond to all public comments received and publish both the public comments and the State's response in the Environmental Monitor. You will also receive an original hard copy response via US Mail.

In the meantime please feel free to contact me if you have any questions.

Patrick O'Brien Office of Policy and Management Office of Finance - Bureau of Assets Management 450 Capitol Avenue - MS#52ASP Hartford, CT 06106-1379 Voice: 860-418-6353

Voice: 860-418-6353 Fax: 860-418-6495

E-Mail: patrick.obrien@ct.gov
Web: www.ct.gov/opm/property

6-3-2010

* *

From: saintrobert [mailto:saintrobert@comcast.net]

Sent: Thursday, June 03, 2010 6:43 PM

To: O'Brien, Patrick M. Cc: Kopetz, Kevin

Subject: Sale of Seaside Regional Center; Comments

Please confirm receipt of this e-mail. If the attachment is difficult to read, let me know, and I'll send it separately.

Robert Fromer

Urban Sprawl Leaves Its PAH Signature

PETER C. VAN METRE.*.'
BARBARA J. MAHLER.' AND
EDWARD T. FURLONG'

U.S. Geological Survey, 8027 Exchange Drive, Austin, Texas 78751, and U.S. Geological Survey, P.O. Box 25046, MS 407, Denver Federal Center, Lakewood, Colorado 80225

The increasing vehicle traffic associated with urban sprawl in the United States is frequently linked to degradation of air quality, but its effect on aquatic sediment is less wellrecognized. This study evaluates trends in PAHs, a group of contaminants with multiple urban sources, in sediment cores from 10 reservoirs and lakes in six U.S. metropolitan areas. The watersheds chosen represent a range in degree and age of urbanization. Concentrations of PAHs in all 10 reservoirs and lakes increased during the past 20-40 years, PAH contamination of the most recently deposited sediment at all sites exceeded sedimentquality quidelines established by Environment Canada, in some cases by several orders of magnitude. These results add a new chapter to the story told by previous coring studies that reported decreasing concentrations of PAHs after reaching highs in the 1950s. Concurrent with the increase in concentrations is a change in the assemblage of PAHs that indicates the increasing trends are driven by combustion sources. The increase in PAH concentrations tracks closely with increases in automobile use, even in watersheds that have not undergone substantial changes in urban land-use levels since the 1970s.

Introduction

Polycyclic aromatic hydrocarbons (PAHs) represent the largest class of suspected carcinogens (1) and can present a threat to aquatic life (2). The presence and distribution of PAHs in the environment are largely a product of the incomplete combustion of petroleum, oil, coal, and wood (3). Anthropogenic sources such as vehicles, heating and power plants, industrial processes, and refuse and open burning are considered to be the principal sources to the environment (4). On the basis of 1989 data, vehicles produced 11% of PAH emissions in the United Kingdom, domestic coal burning produced 84%, and industrial processes produced 3% (5). Several studies in the 1970s and 1980s reported decreasing trends in PAH concentrations in the environment on a regional scale (United States and Europe) since their peak in the 1950s and 1960s (6-9), on the basis of data from sediment cores from remote and urban lakes and rivers. These reductions have been attributed to reduced use of coal for home heating, industrial emissions controls, and increased efficiency of power plants (7, 9-11).

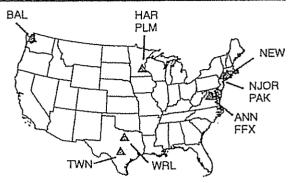


FIGURE 1. Locations of sampling sites. Abbreviations correspond to lake and reservoir names given in Table 1.

While loads of PAHs from some sources may have decreased, the changing face of the urban landscape has resulted in an increase in another source of PAHs: vehicle use. Growth in the use of land for residential and commercial purposes in the United States now far outstrips growth in population (12), a phenomenon termed urban sprawl. Increasing sprawl has resulted in decentralized employment and workplace facilities and greater dependence on vehicles, as reflected in number of miles traveled per capita and per vehicle (13, 14). What effect, if any, has this change had on urban water bodies?

As a part of the U.S. Geological Survey National Water Quality Assessment (NAWQA) Reconstructed Trends program, trends in PAHs were tracked over the last several decades to the mid-to-late 1990s in sediment cores from 10 lakes and reservoirs in six U.S. metropolitan areas. This study indicates that trends in PAH concentrations in developed watersheds over the last three decades, rather than decreasing, are increasing and that the increases may be linked to the increasing amount of urban sprawl and vehicle traffic in urban and suburban areas.

Methods

Sediment cores from lakes and reservoirs can be used to reconstruct historical trends in water quality (15, 16). Trends are recorded for hydrophobic, persistent compounds, such as PAHs, that bind to sediment particles. PAHs sorb to particulates and are transported to receiving water bodies via atmospheric deposition (17), sewage effluent (18), and surface runoff (19). For this study, sediment cores were collected from seven reservoirs and three lakes across the United States (Figure 1). Land use in the watersheds of these reservoirs and lakes is largely mixed residential and commercial with percent urban land use ranging from 25 to nearly 100% (Table 1). Three sites are in watersheds experiencing rapid growth since the 1970s (58–122% increase in urban land use), three sites are in watersheds experiencing moderate growth (26-36%), and four sites are in watersheds with relatively stable levels of urban land use (0-5%). The onset of development ranges from the early 1900s (e.g., Lake Harriet and Newbridge Pond) to as recently as the 1970s (e.g., Palmer

Cores were collected from the deepest part of the lake or in the lower part of the reservoir and sectioned into vertically discrete subsamples for analysis of ¹³⁷Cs and PAHs. ²¹⁰Pb was analyzed for selected lakes. Samples were also analyzed for major and minor elements, chlorinated organic pesticides, and PCBs (not presented in this paper).

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U.S. Geological Survey, Austin, TX.

¹ U.S. Geological Survey, Lakewood, CO.

TABLE 1. Selected Characteristics of Lakes Sampled

reservoir or lake	sampling date	depth of water (m)	lake area (km ²⁾	watershed area (km²)	% urban, 19705²	% urban, 1990°	% urban change, 1970s—1990°
Lake Anne, VA (ANN)	Jun 1996	6.5	0.13	2.3	44.8	85.7	91
Lake Ballinger, WA (BAL)	Jun 1998	9.9	0.40	13.7	93.0	96.5	4
Lake Fairfax, VA (FFX)	Sep 1997	3.8	0.11	8.4	58.8	92.8	58
Lake Harriet, MN (HAR)	Jul 1997	21.3	1.2	6.1	79.7	79.7	0
Newbridge Pond, NY (NEW)	Sep 1997	2	0.042	7.9	99.6	99.6	0
Orange Reservior, NJ (NJOR)	Sep 1997	nra	0.35	11.7	77.1	97.1	26
Lake Packanack, NJ (PAK)	Sep 1997	3	0.33	4.8	73.2	93.2	27
Palmer Lake, MN (PLM)	Jul 1997	1	0.13	64.9	29.6	65.6	122
Town Lake, TX (TWN)	Aug 1998	B.5	0.73	404	23.8	25,1°	5
White Rock Lake, TX (WRL)	Jun 1996	4.9	4.4	265	56.4	76.7	36

^{*} Based on ref 20. * Based on ref 21. * Sites grouped by percent change in urban land use: rapid (ANN, FFX, PLM), moderate (NJOR, PAK, WRL), and stable (BAL, HAR, NEW, TWN) ubranization. * nr, not recorded. * Based on ref 22.

TABLE 2. Sediment Accumulation Rates and Age Assignments in Core

lake	basis of age dating ^a	corroberating evidence for age dating?	approx time period of core	sediment thickness (cm)	av linear sedimentation rate (cm/yr)	av mass accumulation rate (g cm ⁻² yr ⁻¹)
Lake Anne	a. c. e. f	d	1968-1996	17	0.60	0.18
Lake Ballinger	c	đ, e	1947-1998	23	0.45	0.11
Lake Fairfax	a. c	d	1952-1997	52	1.2	0.86
Lake Harriet	b, c	d. e	~1800-1997	16	0.60	0.07
Newbridge Pond	C	d, e	1952-1997	54	1.2	0.32
Orange Reservoir	d, e	e	1949-1997	32	0.66	0,24
Lake Packanack	a	d, f, Cub	1932-1997	42	0.64	0.11
Palmer Lake	c, d	e	1949-1997	38	0.78	. 0.41
Town Lake	a, c	d, e	1959-1998	110	2.7	1.95
White Rock Lake	a, c	d e	1913-1996	105	1.3	1.13

³ a, construction date of reservoir; b, ¹⁰Pb; c. ¹³Cs; d, DDT and(or) PCB profiles; e, total Pb peak; f, modeled exponential decrease in sedimentation rate following approach of ref 24. Sampling date used at top of all cores. ⁵ Dramatic trends in copper were matched to historical copper—sulfate treatments of the lake.

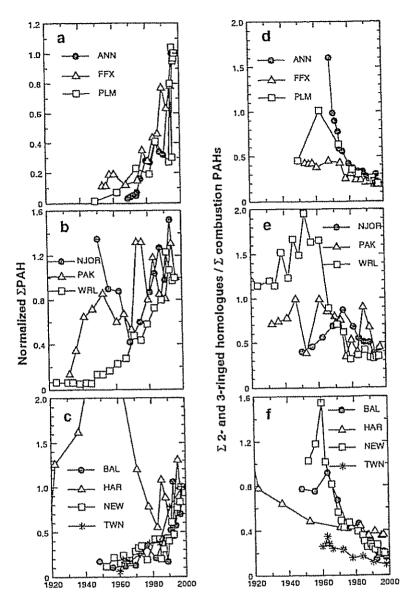
PAHs and alkyl-substituted PAHs (alkyl-PAHs) were extracted, isolated, and analyzed using a variation of the procedure of Furlong et al. (23). Briefly, wet bottom sediment was extracted overnight with dichloromethane in a Soxhlet apparatus. The extract was reduced and filtered. An aliquot of the extract was processed by automated gel-permeation chromatography (GPC) using a styrene-divinyl benzene column and a dichloromethane eluent to remove sulfur and partially isolate the PAHs from coextracted high molecular weight interferences such as humic substances. The PAH fraction was reduced in volume and solvent-exchanged to ethyl acetate in a micro-Snyder column. An aliquot of internal standard solution (a mixture of perdeuterated PAHs) was added to the final extract. PAHs were separated, identified, and quantified by capillary gas chromatography (GC) coupled to mass spectrometry (MS). The parent and alkyl-PAHs were resolved on a fused silica capillary GC column. Selected ion monitoring (SIM) was used to reduce chemical interferences and improve sensitivity. Parent PAHs were identified and quantified by comparison to authentic standards. Individual alkyl-PAHs were quantified when authentic alkyl-substituted standards were available. The multiple isomeric alkyl-PAHs were quantified from SIM mass chromatograms as the sum of all isomers at each alkylation level (C1-naphthalene, C2naphthalene, etc.). When authentic alkyl-substituted standards were unavailable, a parent PAH was used for quantitation. Nineteen parent PAHs, 10 specific alkyl-PAHs, and the homologous series of alkyl-PAHs were determined for this study. Total PAHs (SPAH) was computed as the sum of these, excluding perylene.

Sediment ¹³⁷Cs activity profiles were measured in all 10 reservoirs and lakes (Table 2) by counting freeze-dried sediments in fixed geometry with a high-resolution, intrinsic germanium detector γ -spectrometer. The method is similar

to that reported by Callender and Robbins (2:f). Activity concentrations of ^{210}Pb were measured in two older reservoirs and two lakes (Table 2) by high-precision γ -ray spectrometry. A low-energy photon planar detector was used to detect γ -ray emissions between 40 and 400 keV (including ^{210}Pb), and a high-purity germanium coaxial detector was used for γ -ray emissions between 200 and 2000 keV (including ^{137}Cs).

Date of deposition for sediment intervals within each core was based on a variety of date-depth markers. Those indicators on which dates were based and those used to corroborate the dates assigned are listed in Table 2. The depth of the pre-reservoir surface in cores, for example, was matched with reservoir construction date in 5 of the 7 reservoirs. (In the other two, Newbridge Pond and Orange Reservoir, the age of the reservoirs and the presence of DDT, PCBs, and 137Cs immediately above the pre-reservoir surface indicated a discontinuity.) The other major date-depth markers used were 137Cs first occurrence (1953.0), 137Cs peak concentration (1964.0), and sampling date. Additional and/ or corroboratory date-depth markers included unsupported ²¹⁰Pb profile (Lake Harriet only), lead peak (mid-1970s (25)). and DDT and PCB profiles (first occurrence in the 1940s and peaks in the early and late 1960s, respectively (16).

Cesium-137 profiles provided date markers in 8 of the 10 reservoirs and lakes. The core from White Rock Lake is a good example: ¹³⁷Cs is first detected at a depth of 58 cm, peaks sharply at 48 cm, and then exhibits a smooth exponential decrease to the top of the core. In addition to providing age control, this type of profile is strong evidence that sediments have not been disturbed by bioturbation or other post-depositional mixing. At one site, Lake Harriet, because the core penetrated sediment deposited long before the release of ¹³⁷Cs into the environment ²¹⁰Pb was used in addition to ¹³⁷Cs to provide date information for the lower



Date of sediment deposition

FIGURE 2. Normalized Σ PAH and ratios of PAH assemblages in sediment cores. Trends in Σ PAH among sites are compared by normalizing concentrations in samples from each core to the most recently deposited sample, thus showing trends relative to current conditions. Normalized Σ PAH are shown for watersheds with recent rapid increases (a), moderate increases (b), and stable levels (c) of urbanization. Ratios of PAH assemblages as indicators of PAH source are shown for recent rapid increases (d), moderate increases (e), and stable levels (f) of urbanization. Abbreviations for lake and reservoir sites are as given in Table 1.

portion of the core, following the constant delivery rate model (26).

A date—depth marker other than ¹³⁷Cs was used for 2 of the 10 lakes (NJOR and PAK) because the ¹³⁷Cs peak was not sufficiently defined. For NJOR, a well-defined DDT peak was evidence of undisturbed sediments, and a date of 1964 was assigned to that depth. For PAK, dates were assigned based on occurrence of Cu: treatment of the lake with CuSO₄ began in about 1953, which we correlated to the sharp increase in Cu in the core at 18 cm. For all cores, other date markers such as the DDT peak in the early to mid-1960s and the lead peak in the mid-1970s were checked to see if their depths within the cores were consistent with the dates assigned.

Lakes Anne and Packanack were the only two lakes for which the assumption of constant sedimentation rate seemed

questionable. In these two lakes the initial dating scheme placed the lead peak in the 1980s, unrealistically late. This indicated that mass sedimentation rates must have decreased substantially between the occurrence of the older date markers (137Cs for Anne and Cu for Packanack) and the top of the core. We therefore assumed that a gradual change in sedimentation rate occurred, possibly caused by gradual completion of urban construction in the watersheds resulting in a corresponding reduction in erosion. We modeled this change using an exponential function following the approach of ref 24, where an exponential decrease in mass accumulation rate was demonstrated in many reservoirs.

Although confidence intervals cannot be assigned to the dates corresponding to individual sample intervals in the cores, the consistency of multiple date markers suggests that

TABLE 3. Concentrations of Selected PAHs in Cores

	surficial (top of core) concn				op of core) concn range in concn in core ³					
lake ^b	benzo[a]pyrene	fluoranthene	pyrene	total PAH	benzo[а]ругеле	fluoranthene	pyrene	total PAH		
White Rock Lake	154	262	219	2,790	e3-154	e9-317	e8-262	135-3440		
Town Lake	585	1320	1100	17,400	33-582	57-1,320	66-1,100	670-11 400		
Lake Packanack	528	815	754	12,100	41-744	147-960	118-1,000	1610-15 900		
Orange Reservoir		1480	1260	21 600	314-1500	522-2660	524-2370	13 000-29 100		
Lake Anne	1020	4850	3410	30 300	20-1020	62-4850	54-3410	1030-30 300		
Lake Fairfax	1540	3500	2680	30 800	124-1540	346-4170	278-2690	3410-30 800		
Lake Harriet	1960	4210	3160	35 900	e8-3430	39-16 B00	26-12 700	430-48 300		
Palmer Lake	2110	5480	4380	44 000	19-2110	65-5930	46-4600	518-45 700		
Lake Ballinger	2350	4120	4340	46 300	72-2910	185-7420	263-7430	4810-49 000		
Newbridge Pond	10 800	27 200	22 100	224 000	597-10 800	1450-27 200	1,590-22 100	26 300-224 000		
Canadian SOGs ^c	31.9/762	111/2355	53.0/875							

^{*} Estimated values are maked with 'e'. * Lakes are ordered by total PAH concentrations in surficial samples. * Canadian sediment-quality guidelines; interim sediment-quality guideline/probable effect level (27).

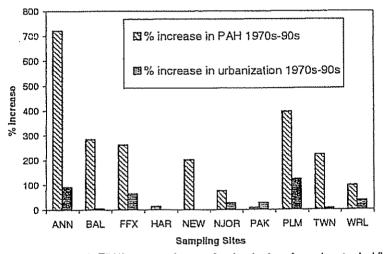


FIGURE 3. Comparison of percent increase in Σ PAH to percent increase in urban land use for each watershed (based on refs 21 and 22) from 1975 to 1995.

most dates are probably within a few years of the actual deposition dates. Pronounced peaks and systematic variations in chemical profiles indicate that contaminant trends have not been obscured by post-depositional mixing. We conclude therefore that these cores are recording multi-year to decadal trends in the contaminants of interest.

Results

Modest to dramatic increases in SPAH concentrations are seen in sediments deposited in all 10 watersheds over the last 20-40 years (Figure 2a-c). In all three rapidly urbanizing sites. SPAH has increased sharply from pre-development levels to the present (Figure 2a). Recent concentrations were 1-2 orders of magnitude above pre-development concentrations at these sites. Among the moderately urbanizing and stable sites, differences in trends reflect the age of the onset of urbanization (Figure 2b,c). In those reservoirs in which the onset of urbanization was largely post-1960, ΣPAH increases steadily from the date of reservoir construction to the present, similar to the trends seen in the rapidurbanization watersheds. In the three watersheds that underwent pre-1960s urbanization and in which the lake or reservoir was in place to record water-quality changes (HAR. PAK, and NJOR), SPAH peaked in the 1950s, similar to trends reported at other sites by other investigators (6-9), and then decreased (Figure 2b.c). In each case, however, this decrease was followed by a subsequent increase beginning in the 1960s in PAK and NJOR and in the 1980s in HAR.

Although many characteristics of the temporal trends are similar at these sites, the magnitude of concentrations varies greatly (Table 3). Concentrations of PAHs are a function not only of source strength but also of sedimentation rate and sediment dilution and thus can vary widely from site to site. The smallest concentrations are in White Rock Lake in Dallas, TX, with a Σ PAH at the sediment surface of 2790 $\mu g/kg$. The largest concentrations are in Newbridge Pond, a small reservoir in an older residential and commercial neighborhood on Long Island in New York, with a Σ PAH in recent sediments of 224 000 $\mu g/kg$. Intermediate concentrations, ranging from about 10 000 to 50 000 $\mu g/kg$ in surficial sediments, occur at the other eight sites.

The assemblage of PAH compounds in the cores indicates a general shift in PAH source over the last 40 years from uncombusted to combusted fossil fuels, coincident with increased concentrations and urbanization. Uncombusted sources (e.g., oil seeps, petroleum spills) contain predominantly two- and three-ringed compounds, whereas combustion (e.g., vehicle exhaust, domestic heating with coal, forest fires) results in predominantly four- and five-ringed species (7, 18). Figure 2d—f shows the change over time in the ratio of two- and three-ringed PAH compounds plus homologues to the sum of the major "combustion" PAHs (28). The combustion PAHs are fluoranthene, pyrene, benz(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(e)pyrene, benzo(a)pyrene, indeno(1.2,3-cd)pyrene, and benzo(g,h,i)perylene. A decrease in this ratio indicates

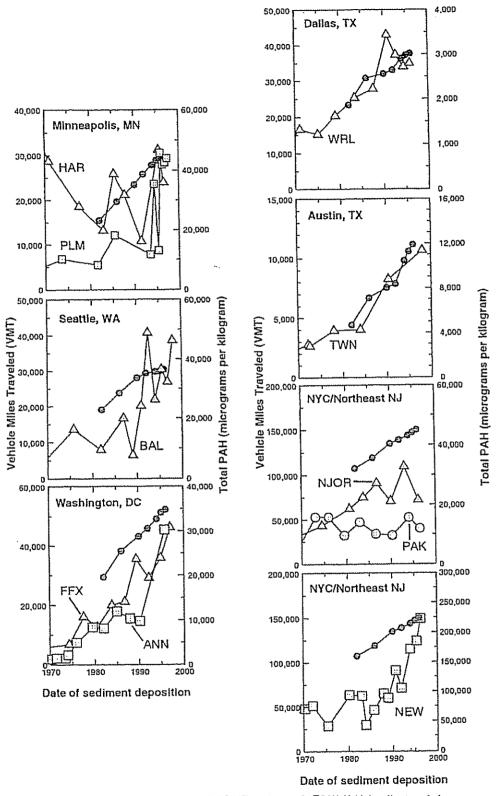


FIGURE 4. Comparison of increases in vehicle miles traveled (VMT) to changes in Σ PAH. Vehicle miles traveled per year over the entire metropolitan center (14) are shown by filled circles; Σ PAH for the take or reservoir from the watershed within that area are shown by shaded symbols.

a shift from uncombusted to combusted fossil fuels as the PAH source. The proportion of noncombustion sources

relative to combustion sources increased during the early history of four watersheds (WRL, NEW, NJOR, and BAL).

peaking from the 1950s to the 1970s; all four sites had some degree of pre-1960s urban development. In contrast, over the last few decades, 9 of the 10 sites show an increase in the importance of combustion sources relative to noncombustion sources coincident with increasing concentrations. Only PAK shows a varying ratio with no trend.

The change in Σ PAH from the mid-1970s to the mid-1990s is compared to the change in the amount of urban land use for each watershed for the same period (Figure 3). In 9 out of 10 cases (PAK being the exception), increase in Σ PAH outpaces increase in urbanization. At some sites (BAL, NEW, and TWN), there was virtually no increase in the amount of urban land use during that period, yet Σ PAH more than doubled.

To investigate the possible effect of traffic on trends in Σ PAH, trends in vehicle use for the six metropolitan areas in this study were plotted versus SPAH (Figure 4). Trends in vehicle miles traveled (VMT) for each metropolitan area and Σ PAH for the 1970s-1990s show similar increases. This comparison is limited in that the VMT data are for entire metropolitan areas and are not specific to the sampled watersheds. In most cases the watersheds contributing runoff to the sampled lakes are much smaller than the urban area. and changes in traffic volume over time may not necessarily match those of the larger urban area. The possible correlation can be better investigated by looking at two reservoir watersheds that correspond well to the urban areas of the VMT data: Town Lake (TWN) in Austin and White Rock Lake (WRL) in Dallas, TX. Town Lake receives drainage from most of urban Austin; nonurban sediments from the Colorado River, which forms Town Lake, are trapped by a series of upstream reservoirs. The White Rock Lake Watershed covers 264 km² of diverse urban land use that is generally a similar mix of residential, commercial, industrial, and transportation land uses as greater Dallas (29). For these two sites, the slopes of PAH concentrations and VMT versus time are very similar (Figure 4), indicating that increases in PAHs are proportional to increases in vehicle traffic, at least for these two locations.

Dicenceion

The results of this study indicate a reversal in the decreasing trend in PAHs in older urban watersheds; a rapid increase in PAHs in all watersheds over the last two decades, resulting in severe degradation of sediment quality at most of these sites; and a possible relation between vehicle traffic and recent deterioration of sediment quality with respect to PAHs in receiving water bodies in urban areas of all ages.

The decreasing trends in PAHs reported in studies carried out in the 1970s and 1980s have been largely attributed to the transition from home heating with coal to the use of oil and natural gas and increased efficiency of centralized power plants (6–9). A possible reversal of the decreasing trend is suggested by a few data points in two earlier studies, one rural and one urban (7, 8). Cores from older urban lakes sampled in this study (HAR, PAK, and NJOR) record the presence of the 1950s peak and subsequent decreasing trend but also document the reversal of the decreasing trend with variable but increasing PAH concentration to the present (1990s). This suggests that at older urban sites the improvements to sediment quality caused by changes in home heating and power generation technology have since been overwhelmed by increases in other sources of PAHs.

The increasing trends in Σ PAH in all 10 water bodies over the last 20–40 years have resulted in high to extremely high concentrations in recently deposited sediments. To put the concentrations of PAHs analyzed in this study into an ecological perspective, the Canadian Sediment Quality Guidelines for the Protection of Aquatic Life (27) for three of the most prevalent PAHs are listed at the bottom of Table 3. Concentrations in surficial sediments (top of core) for all

10 lakes exceed the interim freshwater sediment quality guidelines (ISQGs—the concentration below which adverse effects are unlikely to occur) for these three compounds and 6 or more of the 10 lakes exceed the probable effect levels (PELs—the concentration above which adverse biological effects are expected to occur) for these compounds. For the worst case, Newbridge Pond, concentrations of benzo[a]-pyrene, fluoranthene, and pyrene are 14, 12, and 25 times the PELs, respectively. Clearly, increases in PAHs in urban water bodies have degraded sediment quality to the point that it is an ecological concern.

The increase in PAHs in new urban settings cannot be attributed solely to urbanization of the watersheds (Figure 3). This is most clearly illustrated by those watersheds in which urban levels are stable (Table 1; BAL, HAR, NEW, and TWN). The increase in PAH concentrations in these watersheds is, however, coincident with increases in automobile use (Figure 4). Among the sources of PAHs related to automobiles are tire wear, crankcase oil, roadway wear, and car soot and exhaust (19, 30–32). Trends in ∑PAH from the 1970s to the present compare well to trends in VMT on freeways and major arterial streets for the associated urban areas for all sites and ages of urban development (Figure 4).

One intriguing possibility suggested by the results of this study is that urban growth or sprawl outside the watershed may adversely affect water quality within the watershed. This is most evident when a watershed has undergone only a relatively minor change in degree of urbanization. For example, Austin, TX, is one of the most rapidly growing cities in the country, but the majority of the growth there has occurred around the fringes of the city and outside of the watershed of Town Lake. This growth has contributed to large increases in vehicle traffic in the Town Lake watershed; traffic on MoPac Expressway, most of which lies within the watershed and which crosses Town Lake, almost doubled between 1990 and 1997 (33). The large increases in traffic offer an explanation for why PAHs more than doubled in Town Lake from 1975 to 1990 while percent urban land use only increased by 5%. This suggests that urban sprawl in outlying areas may affect traffic patterns and water quality in the inner city.

The similar trends in VMT and PAHs in reservoir and lake sediments seen here indicate that, in the absence of reductions in vehicle-related PAH releases, ∑PAH will continue to increase at rates comparable to those projected for automobile use. Reduction of PAHs in the environment will not be easily achieved. Although fluxes of several contaminants (nitrogen oxides, airborne particulates <10 μm, carbon monoxide, and volatile organic compounds) in transportation-related air emissions in the United States have been decreasing since the 1970s (34), PAHs in the environment, as shown here, are continuing to increase coincident with increasing VMT. This apparent contradiction may result from the fact that there are several sources of vehicle-related PAHs in addition to exhaust, including asphalt wear, tire wear, and leaks and spills of engine oil. The multiple vehiclerelated sources, coupled with increasing dependence on the automobile, highlight the complexity of reducing PAH releases into the environment.

Acknowledgments

We thank Robert Eganhouse and Tom Lopes (U.S. Geological Survey) for their many helpful comments. We also thank Corey Stephens (U.S. Geological Survey) for compilation of land-use data for the sampled watersheds. Mention of brand names in the text is for identification purposes only and does not constitute endorsement by the U.S. Geological Survey.

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O'Brien, Patrick M.

From:

saintrobert [saintrobert@comcast.net]
Thursday, June 03, 2010 6:43 PM
O'Brien, Patrick M.
Kopetz, Kevin
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To: Cc:

Subject:

Attachments:

Please confirm receipt of this e-mail. If the attachment is difficult to read, let me know, and I'll send it separately.

Robert Fromer

SENT VIA E-MAIL TO: patrick.obrien@ct.gov

Robert Fromer P.O. Box 71 Windsor, CT 06095

Dr. David Bingham 50 White Birch Road Salem, CT 06420

Kathleen Jacques 10 Magonk Point Road Waterfrod, CT 06385

Patrick O'Brien Office of Policy and Management 450 Capitol Avenue MS#52 ASP Hartford, CT 06106-06106-1379

> Re: The proposed transfer of Seaside Regional Center, 36 Shore Road, Waterford, Connecticut 06385

The Connecticut Department of Public Works ("DPW") selected Mr. Mark Steiner as the successful bidder for the purchase and transfer of the Seaside Regional Center ("Seaside"), Waterford. The undersigned provide the following comments and recommendations for the Council on Environmental Quality's consideration.

The 32 acre Seaside parcel has about 1500 feet of direct shoreline access to Long Island Sound. The State removed most non-historic buildings from the property during the summer and fall of 2009. Approximately 70 percent of the site is undeveloped open space or field and meadow, populated with various specimens of mature trees. The property is home to a large selection of wildlife, including hawks, egrets and other shore birds, Baltimore Orioles, finches, hummingbirds, bats, butterflies and mammals, including deer, coyotes, turkeys, fisher cats, and possibly New England cottontail rabbits – a threatened species.

Office of Policy and Management Seaside Regional Center Transfer June 03, 2010 Page - 2 —

The fields on the west side have a high water table and there is a stream that traverses the property from north to south and empties into the Sound. There are four divisions of beachfront, two of which are sandy and suitable for swimming. There are several jetties, from which many people fish for stripers, blue fish, flounder and blackfish. One of the older jetties has a structure that was designed to provide handicap access. The water is extremely clean, which Kathleen Jacques can attest to, because the adjoining water was approved for shellfish depuration in the 1990s.

The site has a main road that divides the east and west sides, and the two buildings designed by Cass Gilbert are on the east side. The State owns a group home on the west side that has frontage on Shore Road. It would be very easy to subdivide the site and have the two Gilbert buildings sold for private use. A considerable amount would remain as open space with no hardship to the developer. Early in the process, the Office of Policy Management decided that subdivision would not be considered to prevent the entire site from being divided as opposed to just splitting it in half. The State could keep the group home side that also has a residential duplex and the former superintendent's homes. They are suitable for family respite or staff training facilities for the Department of Developmental Services; at one time Hospice expressed an interest in them. These houses abut the residents on Magonk Point with virtually no buffer between them.

Except for the group home and some security lights, there is very little light pollution emanating from the site. The fields are untreated by fertilizers or pesticides. There are no automobiles on the site, and a very small amount of paved area; the main road continues along the east side up to the main building, which has the remains of a staff parking lot there. There are smaller roads on the west side that lead to the two other buildings.

The property abuts a rural neighborhood of older modest sized lots, and is listed in the current Town of Waterford Plan of Preservation, Conservation and Development as desired open space and is included in a proposed trail system.

The site is accessed by Shore Road, which is winding and narrow in places. It is feared that the proposed development will require widening of this road, and perhaps a Stop Light at the corner of Shore Road and the heavily traveled Route 213.

Office of Policy and Management Seaside Regional Center Transfer June 03, 2010 Page - 3 —

Mr. Fromer provided a copy of the legislative history concerning the requirement for water dependent uses within the ocastal area and its interpretative application by the previous Commissioner of the Connecticut Department of Environmental Protection under the Connecticut Coastal Management Act ("CCMA"). The notice of the proposed transfer in the Environmental Monitor for May 18, 2010 reads in pertinent part as follows:

The agency is proposing to transfer the property with the following restrictions on future uses: The purchaser has offered to place a conservation/preservation easement over certain portions of the property, primarily over the floodplain areas, which include the beach area waterward of the seawall, and other upland areas. Purchaser has proposed providing public access in perpetuity to the conservation/preservation areas for passive recreation. The easement would be in favor of the State and the public.

The Connecticut General Statutes ("Conn. Gen. Stats."), section 22a-93(16) provides for public access as a defined "water dependent use" in the following manner:

"Water-dependent uses" means those uses and facilities which require direct access to, or location in, marine or tidal waters and which therefore cannot be located inland, including but not limited to: Marinas, recreational and commercial fishing and boating facilities, finfish and shellfish processing plants, waterfront dock and port facilities, shipyards and boat building facilities, water-based recreational uses, navigation aides, basins and channels, industrial uses dependent upon water-borne transportation or requiring large volumes of cooling or process water which cannot reasonably be located or operated at an inland site and uses which provide general public access to marine or tidal waters;

(Emphasis added.)

Further, although public access is a defined "water-dependent use", it is not legally permissible to justify primarily "water-enhanced uses" or water-related uses" such as condominiums, which has no requirement for direct access to Long Island Sound. The Conn. Gen. Stats, sections 22a-92(a)(3) and (b)(1)(A) require the "highest priority and preference for water dependent uses."

Mr. Steiner proposed parking areas for the residents and for public access. Normally, such parking surfaces, whether new or existing, are impermeable asphaltic materials. Further, future use of such parking surfaces often entail the

Office of Policy and Management Seaside Regional Center Transfer June 03, 2010 Page - 4 —

use of tar-based driveway sealers, which are known sources of Polycyclic Aromatic Hydrocarbons ("PAHs"). According to the attached article, PAHs are toxic pollutants to aquatic life.

Finally, DPW should seriously consider leasing, instead of selling, the land to the successful bidder. In this way, the state could acquire the developed assets of the site in the future should the improvements become financially unviable.

Therefore, we request that CEQ recommend that DPW prepare a phased Environmental Impact Evaluation ("EIE") in accordance with Conn. Gen. Stats., section 22a-1b. This means that DPW would completely characterize the existing environment and when the developer submits site plans to the land-use agencies, DPW would finalize the EIE. Additionally, we request the limitation of the condominiums to adaptive reuse of the historic structures, use of pervious pavement for any parking areas, and restriction on the use of driveway sealers. Furthur, we support leasing of the land, instead of its sale.

Cordiany,
Polest Fromer
Robert Fromer
Digam, M.S.
David Bingham
/s/ <u>Kathleen Jacques</u>
Kathleen Jacques

C---11-11--

Office of Policy and Management Seaside Regional Center Transfer June 03, 2010 Page - 5 –

Cc:

Attorney Kevin Kopetz Department of Public Works 165 Capitol Avenue, 443 Hartford, CT 06106 Kevin.kopetz@ct.gov

Attachment:

U.S. Geological Survey, Urban Sprawl Leaves Its PAH

Signature, Environ. Sci. Technol. 2000, 34, 4064-4070

Urban Sprawl Leaves Its PAH Signature

PERSON CONAN MERRECOL BARBARA J. MARLER, LAND EDWARD T. FURLOWS! US Centegical Survey, 6077 Earlings Order. north, Terms 18704, and U.S. Grobby lend Survey. PD Box 20046, MS 407, Denvir Federal Center. Informati, Coderato 1807.55

The increasing vehicle traffic associated with intrinspraint in the United States is frequently taked to degradation of air quality, but its effect on aquatic sediment is less wellrecomined. This study evaluates trends in PAHs, a m sesses mediu elgitum dilik sheminemes le que g sedment cares from 10 reservices and blus in ab U.S. metropolism meas. The watersheds chasen represent a more a degree and are of urbosization. Concentrations of PAIS in all 10 reservats and takes increased buring the past 20-40 years. PAH contamination of the next recently themselved sections of all sites exceeded sectionariconfly prideines established by Engiranment Canada, in some cases by second orders of magnitude. These results add a new chapter to the story told by previous coming studies that reported decreasing concentrations of FAFs. effer reacting highs in the 1960s. Concernent with the increase is concentrations is a change in the assessmage of FALE that indicates the increasing trends are discuss by combination consider. The increase in FAH concentrations tracks classly with increases in automobile use, even or variety had been not undergone substituted abouges n arban land-use locals since the 1930s.

Introduction

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1931's and also barrenaged PMIs labyt-PMIs were रपणभावती, हेर्स्ट्रेस्ट्रले, बमले बम्बद्वेल्लचे कुलाहु स भागवतिया स्टिपेट program of funding and (20). Reich, wer posent school कार इम्रामहरूले हम तामुद्रोग कारी। तेर्द्रोहिए लाग्न विमाद समा दिल्ही है। व कृतिकालक. अस्ति स्वाहाना अवक त्य केल वर्ष भागते विभागत के अस्ति है। of the corner may processed by anomand get yearner than एकोताम महाराज्य व क्वितिकेहरणमहाराज्य हो कार्य अस्ट महाराज्य अस्तिहासाची property section the PAHs from consequent bigh appropriaweight maniferences with as dumin unbramities. The PAN रेक्ट्रांट्रमा कार राज्येन्द्राचे रंग महीताम् साले अने राम राष्ट्रीयाहाले स ediglace acción micro Supécico Lung. An disperción com t smithed solution in missage of perferenced Bills) we needed to the finite square. Bills new sequenced, Mentiled and quantified by capillary production arguing (OC) coupled to mass spectromeny (MS). The purple and of q (PA) have to resolved our firedsilko enpilkey GC column Sekszedion nguingaing [5] Mi was weet a regioned be mice three Sacrices वाल माम्रास्त्र उटाक्सारोपूर विप्तास विशेषित करार जेटामाँग्लेचे वाले n kyl-ft.lla vere कृष्णवर्षेत्रपोष्टरेक्य क्रमान्त्रपोत्रप्रेत्र सेपूर्व व्यक्तिकार् countred where in additive. The majority countries alogs fully near eparation of from SIM mass change regardles as the same ed a Leganges at each aligher an level (CL mapheliciere, C2mighting in early When are henry oby) substituted some chieds were ununablide, a general IVII was used die epiuncommon Numeron parent PATS, to specific a high PATS, and the homological series of a light PATS were determined for this saids. Tout PAH: Williams compared as the sound

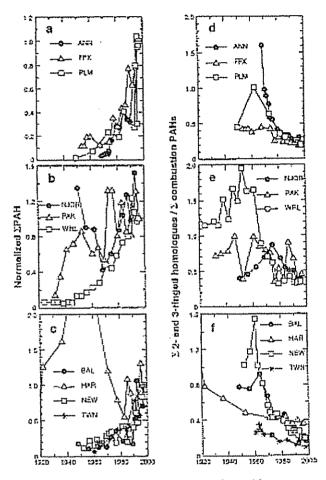
desse, cortaining persons.

Sections 1975 across profiles were measured in all 10 reservoirs and these (Table 2) by constaining free e-drived sections free e-drived promoty-with a high-resolution, include generation descense yespections of the method symmetry permandent descense yespections of the method symmetry.

on the representing Contender and Relation 1240 Actions contended to the Planett measured interesting and the Mark Thirds (Far Ingle-precision) may specify consist Action energy placemplature decreases and medical contended to the property of the Action of ACO Self (including 1974), and a high precing agreement and residual decreases may use of or your cultivation formed and 2000 Self (including 1975).

Bine of deposition for predimental methods a informer may intend on a corner of shore-depth markets. There may independ on which dues were breed and there used to considerate the decreasing days bordin Jaink 3. The depth of the presentation surface for corner and finish section in corner. For example, was marked with reservoir comparation that in 5 of the 7 meteories. In the other and Merchanty Pountaired Quays Bearmon, thengs of the reservoirs and the presents of DID. BCBs, and ¹²Ca immediate habour the present of DID. BCBs, and ¹²Ca immediate habour the present of the -depth uniform seed were ¹²Ca immediate current [185109]. ¹²Ca protection approach [185409], ¹²Ca protection approach [18540], ¹²Ca protection approach [18540], ¹²Ca protection [18540], ¹²Ca protection [18540], ¹³Ca profile [1866], ¹³Ca profile [1866],

Continue III profiles premidentel numbers in deal the 10 montraits and takes. The core from White Book lade is a good enumple 12Cs is first described in a depth of 38 cm, perior sharply in 48 cm, and then exhibits a smooth expense with decrease to the top of the core. In addition a smooth expense with decrease to the top of the core. In addition to jecusting any country, this type of profile issuance or ideas a class section of the control of the contr



Date of sediment deposition

DOUBLE L. Monte that CDAH and eaths of DAH accordings in the interior and the CDAH among other made in promoting commentation in standard bear and to the major and place that are considered by the standard of the consistency of the consisten

प्रकारकारकीर्धः तस्य, विक्रिकांषुत्र १५० स्वरूपात्रस्था सङ्ग्रहः १५०व्छ । १२१४

A chiec-elepth market either thrus FCs was used for 2 of the 10 high 100 H and PAN becomes the FCs peak was not sufficiently defined from NIOR a well-elimed DDT peak was exclusived of threismed for NIOR a well-elimed DDT peak was excluse of threismed seediments, and a chiec of 1004 was assigned to that depth for PAN, chies were assigned based encoccurrence of Car invaluented better with CoSC (despite inches PAS), who is received to the Strap to cross in Car in the error as 18 cm. For all coops, other chiec markets such a sche DIU grafs in the curb to mid-Philos and the leaf peak in the mid-100% were checked to see if their depths nothin the coops were considered to the first excited.

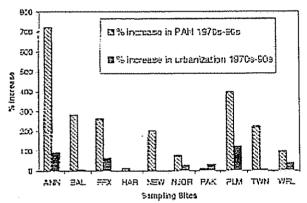
Later Ame and The mark were the only own bless for which then comprehensive members which the members we used

questionable. In these two livers the initial chang solvine placed the field peric in the 1980s, uneralisatedly for. This independation respectationate relatives in solving the field subsection with the executance of the older date subsects 1970s for June and Order discouncid and the consisters 1970s for June and Order discouncid and the consisters 1970s for June and Order discouncid and the consister case. We therefore recommed their gracked complexity into the occurred, providing consend by gracked complexity information consistency and materials for gracked complexity in the construction of the 1974 and the consequence of the consequence of the consequence in many requirements.

Alternal confidence incomes counce in occurrence to the consequenting to individual completions in the crees, a becomise my elimidiple due mujers suggests due

TIBLE 3. Concustra	alions of Soloca	ed PAlis In C	biet							
លាពីនាវ វ៉ុងគ្នា នាំ ឈ្មោះ) លោកភា					हमाङ्गा के दक्षात के द्रास्थ					
Lice*	क्ष्माम् तेत्रकाम	iluarribeia	हरूकान	Ļ enis fal	handağırın	(harringn)	M esia	ten FAI		
Wate Book Lake	751	757	719	2,130	45 - 15 (69-317	98 - 3 57	735~3330		
Torset Later	5.7.5	73.70	1777	11,300	13-122	53-1,370	ረ ፅ – 1,100	<00-11-120		
Lake Alekarusk	578	ant.	354	77, 770	31-344	141-905	114-1,000	3610-35500		
Crimpallmonair		1170	1740	77 (00)	31 (~15¢0	\$ 27 ~ 7541)	574-2T/D	מסב כת - כמס נג		
Later Array	1030	4350	3 (10	ज्ञा उद्धा	30 ~ 3030	44-1850	M-3173	3030~30 300		
i day fairing	1540	3500	2450	30,800	174-1540	3 12- 11.0	738-7650	3110-306@		
Like Berna	15:0	4233	33:0	35,900	05-3110	19-14800	75-17 750	110-15 300		
Mainter Lake	7110	5430	1,750	41 000	19-2110	6.5-5990	45-4500	515-15 300		
toke Holkmeer	2350	1130	4310	45,300	22 - 7910	155 - 24.0	243-2410	\$510~ \$9.000		
Managarity Street	10250	77 .T20	27700	271000	597-10240	1450-27700	1,510-77 370	28,330-271030		
Caretia 500°	319/357	737'7355	110/515							

- (Emissional province) - Library of edgy and Alega as those in a feet supply - Charles then 1931 yillibrid a ment sement quity grin inceptions of et less (2)



Similard. Comparison of gamesin increase in EPAN regeroscriptorests in unsymbol with a second natural placed on relatives M. don't Not with.

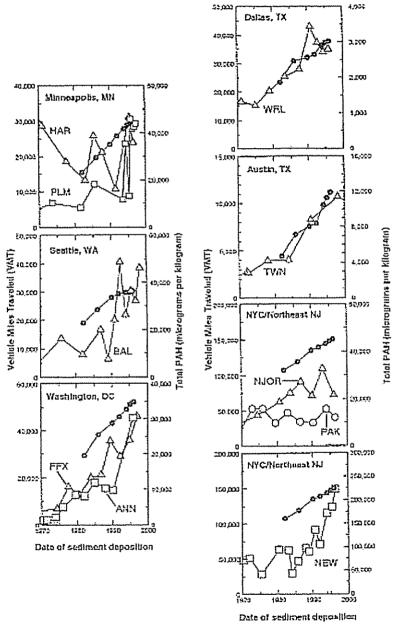
most chiefs are presently within a few years of the actival elephonism chiefs. Premiente of peniss and systematic manifests in chemical profiles include the communication are determined in proceeding profiles in the communication of them chiefs and proceeding profiles. We conclude them for distanced by proceeding resident mixing. We conclude them for distances consider procedul grants your or descript grants in the communication of interest.

Results

Modern to demand increases in ΣRM conventions are अनुसा का अवस्थितात्वाक विवाहतांत्रवर्त का तथे। वि कार्याक्षतांत्रें एकक् क्रिक Bet 30-40 years (Figure In -c). In all three rapidly university sies. CPAH für interenset sturgig from per elemenginem dereksendie genorm (Figure 2a). Describe nies ministrationes 1–2 gedens of magnitude winne gree-describigation statismen. wrogens in these view Anxing the professory utimalising वामने उपावीर उदेत्य, होसीनाहमका वेप एटमन्त्र कारीद्रार केर महार हार्रिकेट care: of egumention ffigure Early in three reservoirs in which the construction managed personal PAH क्रिक्ट अन्दर्भ का होते हैं कि मा स्टब्स होता होते हैं कि उन्हरून के का the present souther to the creats seen in the course infinitely was and beds in the three with beds dut angherment pre-Pill's arbanien inn and in which the bide of economies in place concerning and equilibre in many for the contract MAR. PAX, and NICIR, DIA Hyensed in the 1950s, similar corrects हम्भूकान् darealer singsig other imensigners कि- छै. समर्थन भग लेक्का अर्थ (विद्यान केंद्र) । In mott case, beneves, shis नेव्याना अ क्या अनेतीस्था एपरेस्तु वाद्यांसार स्कृत्यां अध्यक्ता अस्ति । विभिन्न in PAK and MOS and mobe that in this

Alternationary characteristics of the conjugate of some sanitary there when the magnitude of convenient was trained by Takibe 10. Convenient is unforthed that can handle made only of source security has also of Sections nation me and security discovered that the object of Sections are the security of the post late in Baltin TX, with a ERA late the section on whithis Book late in Baltin TX, with a ERA late the section on white the object late in Baltin TX, with a ERA late the section of white the object of the section of section of the secti

The assembly collisher our and single executivities a general while in 1941 server over the 4x4 40 years from any confined at a confined forsil facts, coincident with improved congruentism and action or out. In confined server log colliserys, provident spills) contain previous and the extract of any provident probability two and three-ranged companies. It is not served, feely reads in previous animals from any with excl. Served feely reads in previous the charge over the singled specifically of Figure 16-4 stress the charge over the in the major of madeline single base boundaries and gain of the major of confined in \$1.0%. The confined in \$4.0% is major the animal provident (4.0% is confined in \$1.0% is not be analytic exemptions, provide his confined in \$1.0% is not be analytic to the confined out of \$1.0% is not be and become and the confined out of the surpression of the confined out of the surpression of the surpression of the confined out of the surpression of the confined out of the surpression of the surpression of the confined out of the surpression of the surpression of the confined out of the surpression of



tifilista. Respersa et lar esses is sa internita pasata NMG paraseges is SPAR. Vas builds parada par year esa saisa untrapolisa como (M) are mont by Alex et das; SPAR lar de las er reserves builds which had est an deve by chada apatala.

a shall from untrangulacted in communicat freshlips to as the PAH scalage. The properties of memorialization secures

where the continuous sources immuted during the early theory of Kair material of ReL NEW, MIDR, and 0.44%

pensag from the 1950s to the 1950s of the process of the 1960s whom development. In contrast, one the loss for devices, the forms shown in more process, and the 10 size shown in more process and process of the device shown in more process and process of the contrast of the contrast of the contrast of the process of the

The change in EPAH from the mid-1905 to the mod-1906 is compared to the change in the angum of teiting had not for such moreolect for the same people (Figure 3), in 9 out of 10 cases (PAK being the exception), increase in EPAH compares increase intrinsional Atsone sizes (BAL NEW, and TAM), there was remark no mercise in the amounted informatical are change for people get EPAH axes than denilled.

ीं वाम कुरवेद्वाल केल प्रकारांकी राजिएद स्ट्री प्राथमित राम प्रधानने भा EPAH, mentes in reing besselve the six incompletations in this saidy were planed agrees EPAH (Eggare 4). Trends in and the learning to the first of the first o SHAIL for the 1970s-1990s show souther increases. This commercison is limited in that the VMI data are for entire क्षान्यकृतिकाम करवात कार्य ग्रह्म अनुसारित का ग्रीह अमाकृति wascobeds languagenyestle wegesledsconcidusingnanall क्त क्रिक अञ्चलकारी वेशिक्समान भारती अवस्थित सीम्बा सीव सार्वण वात्रक. undermigs in cull besching ones time may not recessed by merech theoret the larges rationaless. The provide contraction त्यम हेन हेम्बद्ध सम्बद्धानुस्ति स् देवलेस्य मा स्टब्स्स्य स्टिस्स्य VATelen Templake (TVM) in Jastin and Wintellock lake (WSI) in Dallas. TX. Jean alaise were nexel-vinage from mos-लाँ ब्रह्में का अवस्थान अस्ति का अस्ति अस् ther, which forms Town Like, are support by a series of approximateses one. The White Perk Like Valvershels ones. 241 Jan Lifeherse whem And the that is generally a similar भारत हर्षे एए अंतिनाम देवी हरतामा एए एकंबी, वेशनी व्यक्ति विकास विकास विकास अवस्था महार Auditoeunggrass Dithis (20). For these maries, the slapes of PATI continuous unit SMT remarkant une sury similar (Figure 4), indicating sincurrence and Albanic propertional क काम कार कार की कार है। इस है है के अपना है के से अपना कर है का स्थाप

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The result and this susty amount a constraint of the formular ment in PAIs in older sufficient amount of the amount in PAIs in older sufficient amount of the amount in a most of the amount of the am

The demonstrate which the queried in modes council and the 1970s and 1980s have been highly artifaced to the consistent from both leading with control to the set of education from both leading with control to the set of education the administration from the process of the elements placed by a few data points in one order modes, one reach and one artifact [1980s, 1988, and 1910s) recent the process of the 1980s point and sixty and 1910s) recent the process of the 1980s point and substitute describing must be an absorbed more the process data that the process of the 1980s point and the describing as the modes from the process data in memory PAH concentration to the process H990s). This suggests that a release after a form a service in approximate an accordance to the process and process generation reclaiming the superinformal partners of realistic plants of PAHs.

The increasing seconds in \$1944 in a)1 the men broke score the first 20°-40° curs have examined in high constraints in figure strength high constraints in recently deposited sections in a function of BMIs multipoid in this study into an engloyed prospective, the Camelian Section in Outling Guidelines for the discount of Aparick Life (27) for three of the measurement in MATS are three transfer in the international further accounted for the constraints in surfact texture in top of event forms.

10 bies exerci de mesan fersimare ordinen quilipgaldeines 1600's che concruencia belor che tanterio effersare unité procésari fertiese dres componissant à crimere af the 10 bies exerci de primite affert le che 160 cus emperation acus chi primite discription de effertie concruencem incre chich admendi independ effertiese experiedamental fertiese componiste for the some case. New locky Paul, concentration of branchiperne, Discription, and progresse to 14, 12, and 21 chiese the 161s, respectively. Condy, increases in 1641s in aftern some inclusioner degraded sediment quality in the point that a fix an ecological concern.

The increase in PAHs in new screen settings caused be intrinsed solely at arternitation of the interchecks Figure 19. This is more cloudy illustrated by stone wire robots in which terining the long solely (Toble 1; 1911, 1913, NEW, and TWN). The increase in PAH consecutations in these wire robots is, homeomy coincident with increase an automorphise Infigure 40. Among the sources of PAHs rethred to increasing solely wire work confusions oil, receiving note, and our soon and extract 180, 40–500. To puls in EPAH from the 1976s in the present company well to transfer in VMT on fore may and implementabilistic explicit a rotation in VMT on fore may and implementabilistic explicit of the associated extensions for the associated extensions for all the particular areas for all pages as for the associated extensions for all pages of a fine and a figure 4).

One including providing suggested by the results of this starty is that upon growth entertual fortests the superstand further than the more than a magnetised first undergone only a manifesty minute change in degree of unimitation. For complete anxion IX, some of the most apply growth for its occurred action. It is supported to the provide the late occurred account the frages of the city and consider of the variethed account the frages of the city and consider of the variethed of from laise. This growth has considered to be principled and the frages of the city and consider of the variethed of frame laise. This growth has considered account of the frages of the city and consider of the variethed and the frages with from laise womenhad action of the frage and some final the constitution of which from the constitution of the frage and consider in from laise from 1975 to 1995 white percent when deathful in Town laise from 1975 to 1995 white percent when deathful in configuration may differ unific process and when quilty in the inner city.

The similaring nels in VMT and PATS in science and his sectioners were described in the inclusion that in the absence of advances. EPAH will contain an industry related if AH relaters. EPAH will contain a notice of schooled if AH in the environment will are the environment will are the environment. Although finites of second communities biological evides, arbitrary purpositions \$10 am, orders morrowed, and relative expanse compounted in managemention in hereful environment in the finite fixed Secondary in the secondary in the secondary in the fixed secondary in the fixed secondary and spills of a general fixed secondary in the secondary in the fixed secondary in the fixed secondary in the fixed secondary. In fill the complexity of reclaim 1941 or browness are the environment.

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We charte Relieve Eguntaness and Tourd open RLS. Geological Survey) for their many helpful commence. We also charte Corey Septlems RLS. Geological Survey) for complicion of hand use chart for his sampled more above. Membrane frame musics in the sent is for schemikenious purposes only and does are conscious endorsement by the LLS. Geological Survey.

Office of Policy and Management Seaside Regional Center Transfer June 03, 2010

Page - 7 -

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