

## **MEMORANDUM**

**SUBJECT:** CRAIGMOOR PRF AND INTERCONNECTION PROJECTS  
SCOPING NOTICE FOR THE CRAIGMOOR WATER MAIN INTERCONNECTION,  
RIDGEFIELD

**TO:** LINDA BRUNZA  
THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION (DEEP)

**FROM:** ZACHARY KUEGLER, PE  
SNYDER CIVIL ENGINEERING, LLC

**DATE:** MAY 19, 2023

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*\*Note: Responses from Snyder Civil Engineering can be found after each prompt in red.*

### **Natural Diversity Database**

*"The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. After a review of the location of this project, it may be in a Natural Diversity Database Area. If state permits are required or state funding is involved, the applicant must submit a Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form (DEEP-APP-007) and all required attachments, including maps, to the NDDB for further review. Additional information concerning NDDB reviews, and the request form may be found on-line at NDDB Requests. Please contact Robin Blum with any questions at [Robin.Blum@ct.gov](mailto:Robin.Blum@ct.gov) or 860-424-4137."*

A Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form was submitted and returned under filing #97217 with New Determination #202303138. This form is attached to this memo under "Attachment A".

### **Fisheries Division**

*"DEEP's Fisheries Division has reviewed the scoping notice for any disturbances to water resources. Since the project is in the early stages and there are no detailed plans to review, Fisheries stated that concerns would depend on the chosen technique for extending the water pipe across the Titicus River, which is a cold-water stream that supports wild brook trout. As a best management practice, proper erosion and sediment controls should be implemented throughout the duration of this project. Any unconfined instream work should be restricted to the period from June 1 to September 30, inclusive. Please contact Shalyn Zappulla with any questions at [Shalyn.Zappulla@ct.gov](mailto:Shalyn.Zappulla@ct.gov)."*

This comment has been noted. Attached, under "Attachment B", are the sections of the Contract Drawings representative of the crossing of the Titicus River.

## **Water Diversion**

*"The scoping notice was reviewed by the Water Planning and Management Division. Transfer of water from one distribution system to another where the combined maximum withdrawal from any source supplying the system or interconnected systems exceeds 50,000 gallons during any twenty-four-hour period is a regulated activity under the Connecticut Water Diversion Policy Act (CWDPA) CGS Sec. 22a-377(c)-1(4). As the supplying system's sources exceed 50,000 gpd, this proposed activity would be regulated under the CWDPA. However, the regulations provide an exemption from permitting for diversion of water incidental to expanding service within a service area, provided the quantity of water withdrawn from any source does not exceed the quantity authorized pursuant to any applicable permit issued or registration filed (Regulations of Connecticut State Agencies, Sec. 22a-377(b)-1(5)). In this case, the transfer is taking place entirely within Aquarion's Ridgefield Exclusive Service Area and would qualify for such an exemption from permitting. Please contact Doug Hoskins with any questions at Doug.Hoskins@ct.gov, or 860-424-4192."*

This comment has been noted.

## **Hydrostatic Pressure Testing Wastewater Discharge**

*"Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as "potable water system maintenance wastewaters" under DEEP's General Permit for Discharges from Miscellaneous Industrial Users (MIU GP, for wastewater discharges to a sewage treatment plant, preferred) or the Comprehensive General Permit for Discharges to Surface Water and Groundwater (Comprehensive GP). The MIU GP became effective October 31, 2020 and states that dischargers now send their notification to the applicable Publicly Owned Treatment Works (POTW also known as sewage treatment plant) that is receiving the wastewater. The MIU GP requires notification to the applicable POTW Authority for the discharge of "potable water system maintenance or sampling wastewaters" if the discharge of the "potable water system maintenance wastewaters" will be greater than 5000 gallons per day. Whether the discharge requires notification to the receiving POTW or not, operating conditions located at Appendix H (5) on page 66 of the MIU GP must be followed.*

*If sanitary sewer is not available in the area, the discharger can use the Comprehensive GP for a discharge to the ground or a surface water. Registration of "potable water system maintenance or sampling wastewaters" is not required in the Comprehensive GP if certain operating conditions in the permit are followed. In the Comprehensive GP, those conditions are located on page 28 at Section 5(a)(3)(O) for discharges to surface water and on page 29 at Section 5(a)(3)(P) for discharges to groundwater.*

*The Miscellaneous and Comprehensive General Permits are administered by the Water Permitting and Enforcement Division of DEEP's Bureau of Materials Management and Compliance Assurance. Forms for these permits are available at Water Discharge Permits and General Permits (ct.gov). A general permit sets terms and conditions for conducting an activity which are protective of the environment. Questions can be directed to Jim Creighton, 860-424-3681, or [James.Creighton@ct.gov](mailto:James.Creighton@ct.gov)."*

The Aquarion Water Company's Environmental Compliance Manager noted that any discharges are performed in compliance with CTDEEP and DPH regulations. The Aquarion Water Company intends to follow the rules set forth under the Comprehensive Permit for discharge of hydrostatic pressure testing.

## **Aquifer Protection**

*"Staff from DEEP reviewed the location of this project and found that it is not in an aquifer protection area and has no comments on the proposed project."*

This comment has been noted.

## **Stormwater Management during Construction**

*"The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable projects (projects primarily by private developers). This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices. Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form and SWPCP to the Department at least 60 days prior to the initiation of construction. Registrations shall include a certification by the Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. For further information, contact the division at 860-424-3025 or DEEP.StormwaterStaff@ct.gov. The construction stormwater general permit registrations must be filed electronically through DEEP's ezFile Portal. Additional information can be found on-line at: Construction Stormwater GP."*

The area of disturbance is less than one acre with the majority of the project taking place within existing paved roadways.

## **Air Management**

*"DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits. DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits. Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction to allow them to enforce idling restrictions at the project site without the involvement of DEEP."*

**This comment has been noted.**

# Craigmoor DEEP Review – Attachment A



NDDDB State Listed Species Review Form



**Connecticut**  
Department of Energy &  
Environmental Protection

[portal.ct.gov/DEEP](http://portal.ct.gov/DEEP)

4/13/2023

Phat Phung  
AQUARION WATER COMPANY  
600 LINDLEY ST  
BRIDGEPORT, CT 06606  
phatphung168@gmail.com

Subject: Craigmoor Pressure Reducing Facility and Craigmoor System Water Main Interconnec  
Filing #: 97217  
NDDDB - New Determination Number: 202303138

Expiration Date: 4/13/2025

Location: 111 Barlow Mountain Rd, Ridgefield, CT

I have reviewed Natural Diversity Database (NDDDB) maps and files regarding this project. According to our records, there are State-listed species (RCSA Sec. 26-306) that are nearby the project location.

- **Bog turtle (*Glyptemys muhlenbergii*) State Endangered, Federally Threatened**

I do not anticipate impacts to this species from your project, however, the presence of a federally listed species may require consultation with the US Fish and Wildlife Service Ecological Field Office in order to be in compliance with the Federal Endangered Species Act if the proposed project requires federal permits or uses federal funds.

This species is found in wetlands having clear slow- moving streams with soft bottoms. Draining and flooding wetlands is a major ecological problem as well as habitat degradation from forest succession and invasive plant species.

Your submission information indicates that your project requires a state permit, license, registration, or authorization, or utilizes state funding or involves state agency action. This NDDDB - New determination may be utilized to fulfill the Endangered and Threatened Species requirements for state-issued permit applications, licenses, registration submissions, and authorizations.

Please be aware of the following limitations and conditions:

Natural Diversity Database information includes all information regarding listed species available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Database and accessed through the ezFile portal as it

becomes available. New information may result in additional review, and new or modified restrictions or conditions may be necessary to remain in compliance with certain state permits.

- During your work listed species may be encountered on site. A report must be submitted by the observer to the Natural Diversity Database promptly and additional review and restrictions or conditions may be necessary to remain in compliance with certain state permits. Please fill out the [appropriate survey form](#) and follow the instructions for submittal.
- Your project involves the state permit application process or other state involvement, including state funding or state agency actions; please note that consultations with your permit analyst or the agency may result in additional requirements. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division may be necessary and additional information, including but not limited to species-specific site surveys, may be required. Any additional review may result in specific restrictions or conditions relating to listed species that may be found at or in the vicinity of the site.
- If your project involves preparing an Environmental Impact Assessment, this NDDDB consultation and determination should not be substituted for biological field surveys assessing on-site habitat and species presence.
- The NDDDB - New determination for the Craigmoor Pressure Reducing Facility and Craigmoor System Water Main Interconnec as described in the submitted information and summarized at the end of this document is valid until 4/13/2025. This determination applies only to the project as described in the submission and summarized at the end of this letter. Please re-submit an updated Request for Review if the project's scope of work and/or timeframe changes, including if work has not begun by 4/13/2025.

If you have further questions, please contact me at the following:

Shannon Kearney  
CT DEEP Bureau of Natural Resources  
Wildlife Division  
Natural Diversity Database  
79 Elm Street  
Hartford, CT 06106-5127  
(860) 424-3170  
Shannon.Kearney@ct.gov

Please reference the Determination Number 202303138 when you e-mail or write. Thank you for consulting the Natural Diversity Data Base.

Shannon Kearney  
Wildlife Division- Natural Diversity Data Base  
79 Elm Street  
Hartford, CT 06106-5127  
(860) 424-3170  
Shannon.Kearney@ct.gov

Application Details:

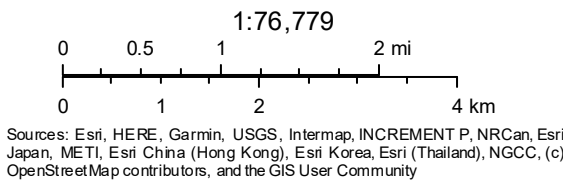
Project involves federal funds or federal permit:	Yes
Project involves state funds, state agency action, or relates to CEPA request:	Yes
Project requires state permit, license, registration, or authorization:	Yes
DEEP enforcement action related to project:	
Project Type:	Energy and Utility Production Facilities and Distribution Infrastructure
Project Sub-type:	New Linear Rights-of Ways: transmission lines, cables, pipelines
Project Name:	Craigmoor Pressure Reducing Facility and Craigmoor System Water Main Interconnec
Project Description:	



# Craigmoor Pressure Reducing Facility and Craigmoor System Water Main Interconnec Map



April 6, 2023



# Craigmoor DEEP Review – Attachment B



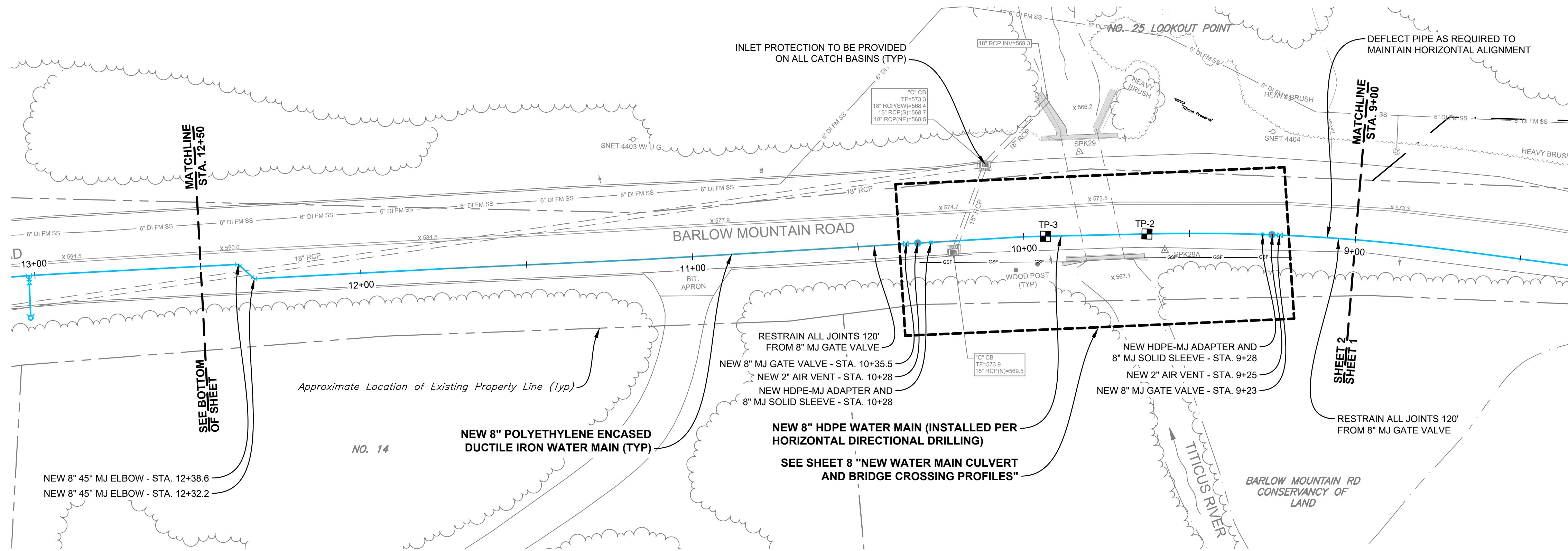
Crossing of Titicus River



DESIGNED	JFD
DRAWN	KPP
CHECKED	DRS
REVISED	

Bridgeport, Connecticut

Ridgefield, Connecticut

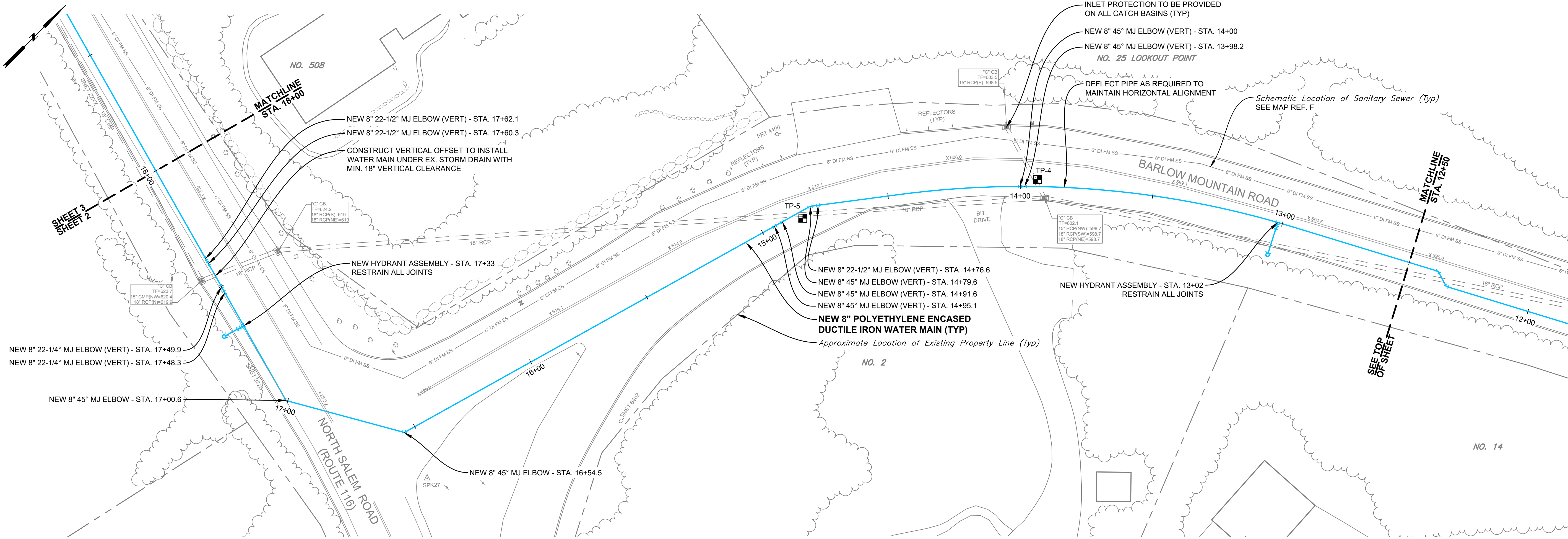


**BARLOW MOUNTAIN ROAD PLAN STA. 9+00 TO STA. 12+50**

SCALE: 1" = 20'



- TEST PIT NOTE:** TP-X
1. THE SYMBOL DENOTES A TEST PIT LOCATION. THE CONTRACTOR SHALL PERFORM TEST PITS TO DETERMINE EXACT SIZE, TYPE, DEPTH, LOCATION AND CONFIGURATION OF EXISTING UTILITY/UTILITIES IN THE CORRESPONDING LOCATIONS.



**BARLOW MOUNTAIN ROAD & NORTH SALEM ROAD**

PLAN STA. 12+50 TO STA. 18+00

SCALE: 1" = 20'



CONTRACT DRAWING





PORTLAND, CONNECTICUT

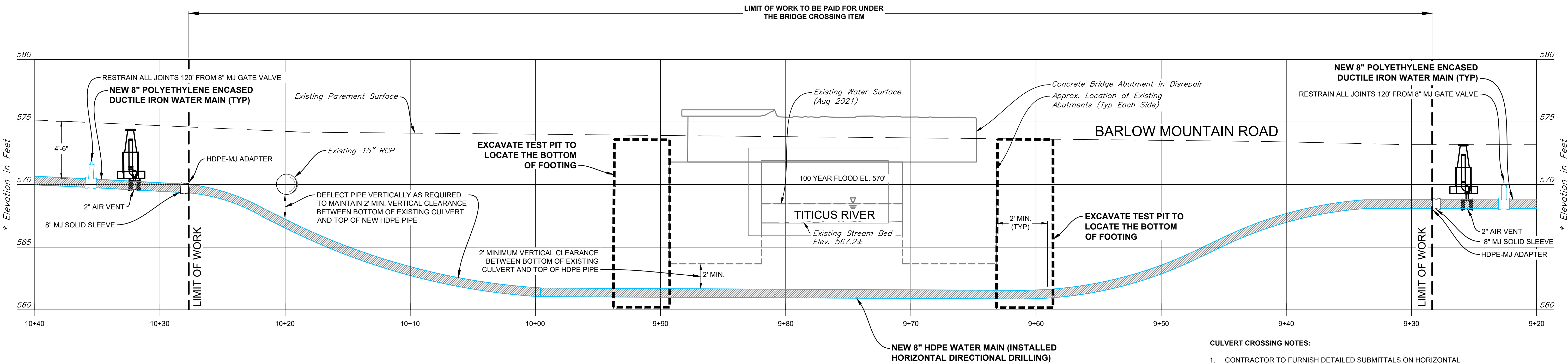
CONTRACT  
DRAWING

NEW WATER MAIN CULVERT AND BRIDGE  
CROSSING PROFILES  
EROSION AND SEDIMENTATION CONTROL  
DETAILS AND TEST PIT TABLE

PREPARED FOR:  
AQUARIAN WATER  
COMPANY OF CT  
Bridgeport, Connecticut

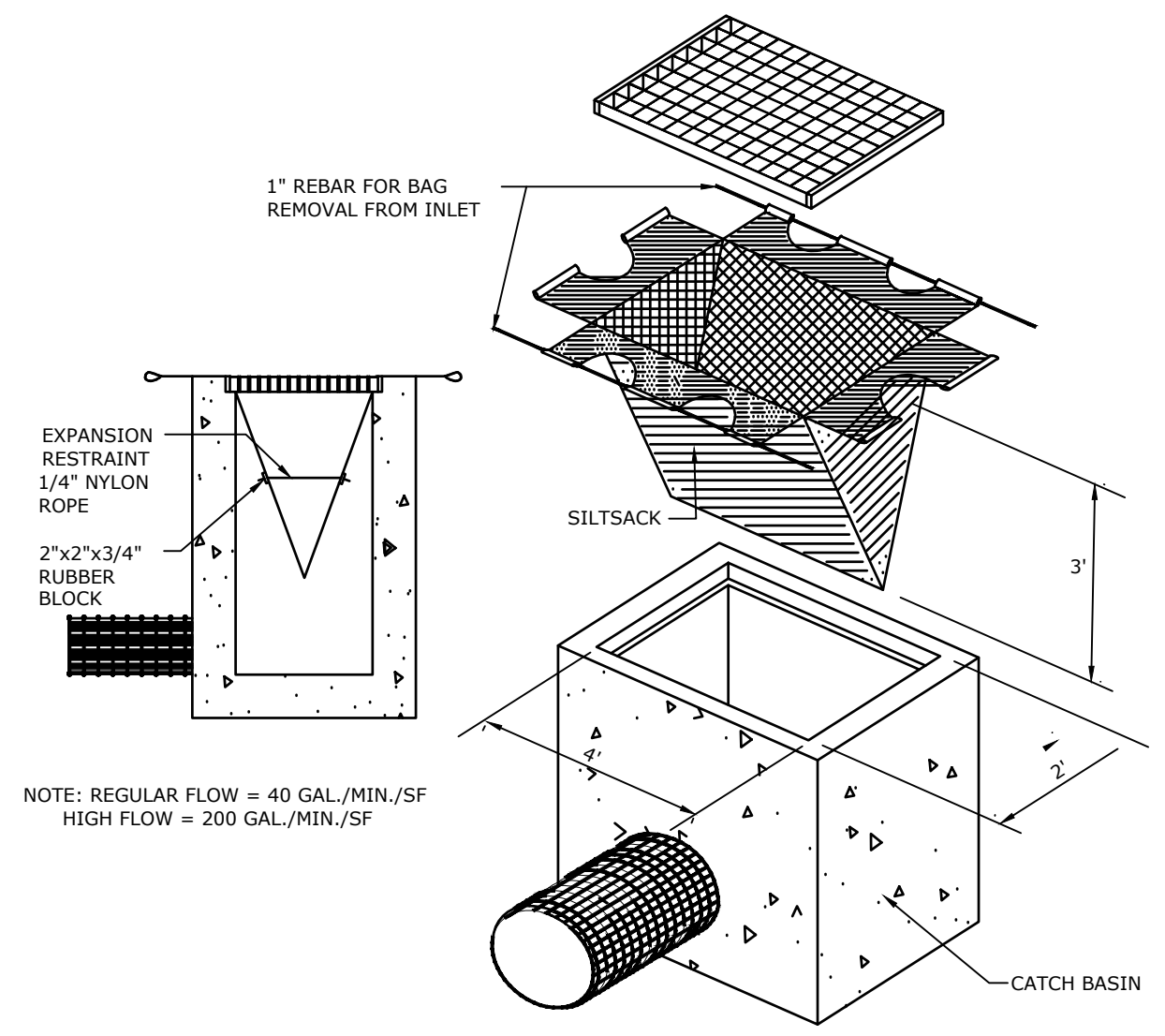
CRAIGMOOR / RIDGEFIELD  
SYSTEM WATER MAIN  
INTERCONNECTION  
Ridgefield, Connecticut

A P R I L 2 0 2 3  
SHEET NO. 8 OF 13  
JOB NO. AWC-221.01

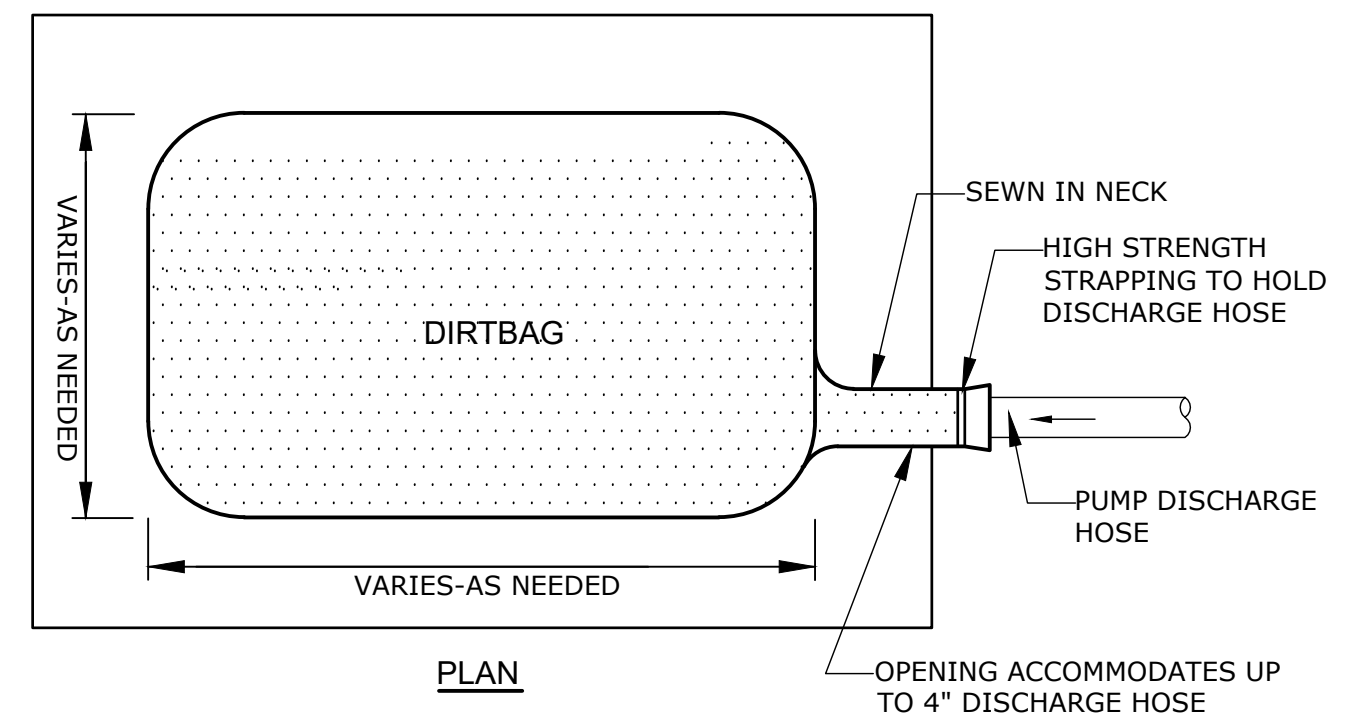


**NEW WATER MAIN BRIDGE CROSSING  
BARLOW MOUNTAIN ROAD PROFILE STA. 9+20 TO 10+40**  
SCALE: 1" = 4'

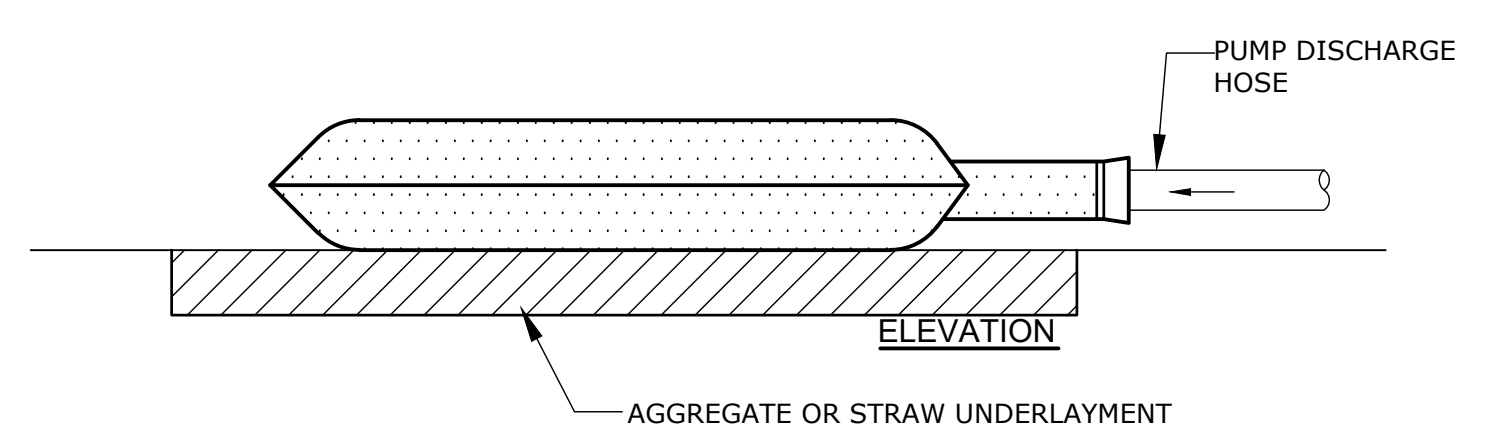
- CULVERT CROSSING NOTES:**
1. CONTRACTOR TO FURNISH DETAILED SUBMITTALS ON HORIZONTAL DIRECTIONAL DRILLING PROCEDURE AND EQUIPMENT TO BE USED.
  2. NO BORINGS OR GROUNDWATER INVESTIGATIONS HAVE BEEN PERFORMED. CONTRACTOR SHALL BE RESPONSIBLE FOR CONTROL OF GROUNDWATER, REMOVAL OF ROCK (IF ENCOUNTERED), AND ALL OTHER REQUIREMENTS AS SPECIFIED TO PERFORM THE CULVERT CROSSING.



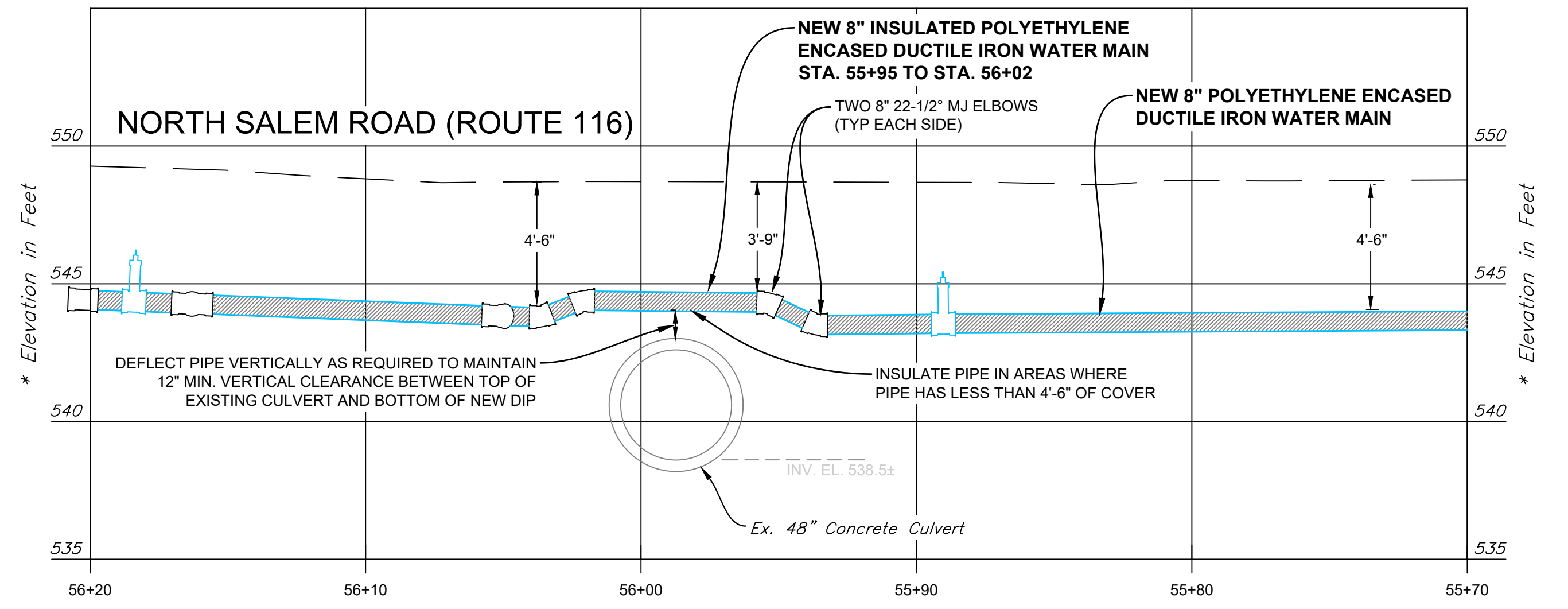
**SILT SACK DETAIL (AWC SD-26)**  
NOT TO SCALE



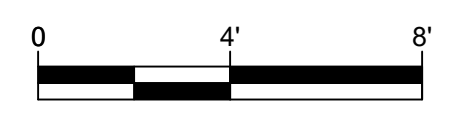
- NOTES:**
- 1) DIRT BAG TO BE PLACED ON AGGREGATE OR STRAW
  - 2) SEAMS TO BE HIGH STRENGTH DOUBLE STITCHED "J" SEAMS



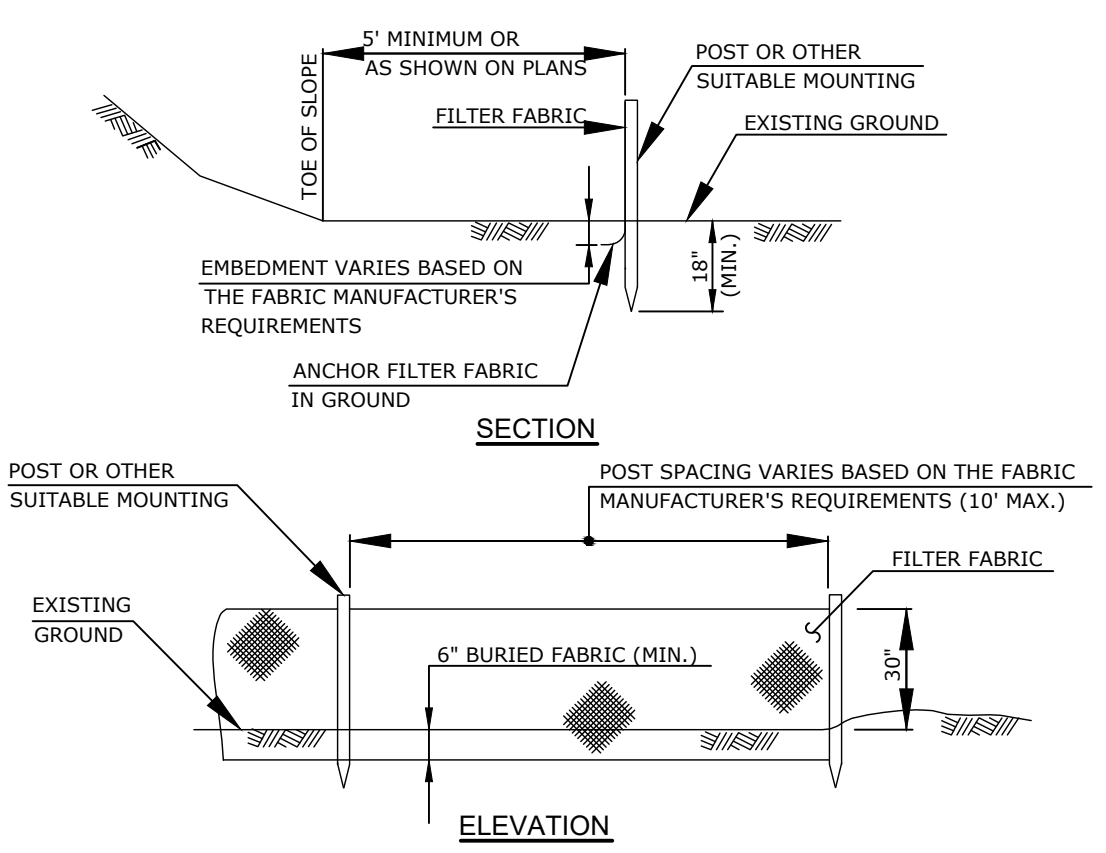
**DIRT BAG DETAIL (AWC SD-27)**  
NOT TO SCALE



**NEW WATER MAIN CULVERT CROSSING  
NORTH SALEM ROAD PROFILE STA. 55+70 TO 56+20**  
SCALE: 1" = 4'



TEST PIT TABLE		
TEST PIT #	TEST PIT STATION	DESCRIPTION
TP2	STA. 9+63	DETERMINE DEPTH AND BOTTOM OF EXISTING CULVERT WALL AND FOOTING
TP3	STA. 9+94	DETERMINE DEPTH AND BOTTOM OF EXISTING CULVERT WALL AND FOOTING
TP4	STA. 13+93	DETERMINE LOCATION AND DEPTH OF EXISTING 15" RCP STORM DRAIN
TP5	STA. 14+86	DETERMINE LOCATION AND DEPTH OF EXISTING 18" RCP STORM DRAIN
TP6	STA. 39+32	DETERMINE LOCATION AND DEPTH OF EXISTING 12" CMP STORM DRAIN
TP7	STA. 55+95	DETERMINE LOCATION AND DEPTH OF EXISTING 48" RCP STORM DRAIN
TP8	STA. 56+02	DETERMINE LOCATION AND DEPTH OF EXISTING 48" RCP STORM DRAIN
TP9	STA. 0+00	LOCATE EXISTING 6" WATER MAIN FOR NEW VALVE INSTALLATION MEASURE DEPTH AND OUTER DIAMETER OF PIPE



**GEOTEXTILE SILT FENCE DETAIL (AWC SD-23)**  
NOT TO SCALE

CONTRACT DRAWING

CAD FILE: Y:\Aquarian - Job Folder\AWC-221.01 - Craigmoor - System Water Main Interconnection\02 Design\Drawings\AWC-221.01-01 Craigmoor Interconnection Review Drawing.dwg PLOTTED: 4/16/2023 12:12 PM BY: Desktop102820