



STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

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To: Phil McLellan
Rentschler Field Project Office, 100 Columbus Boulevard, Suite 501, Hartford

From: David J. Fox - Senior Environmental Analyst **Telephone:** 860-424-4111

Date: January 8, 2016 **E-Mail:** david.fox@ct.gov

Subject: Parking Improvements, Pratt & Whitney Stadium, East Hartford

The Department of Energy & Environmental Protection (DEEP) has reviewed the Notice of Scoping for the proposed parking improvements for Pratt & Whitney Stadium at Rentschler Field in East Hartford. The following comments are submitted for your consideration.

It appears that the wetlands identified as B2 and E1 according to the mapping presented in the 2006 Environmental Impact Evaluation (EIE) may be within the project area. The former is the drainage ditch along the western edge of the project area and the latter is an isolated wooded wetland. Existing inland wetlands and watercourses at the site should be delineated by a certified soil scientist. Any construction activity should avoid regulated areas to the maximum extent practicable. If either the Office of Policy & Management (OPM) or the Capital Region Development Authority (CRDA) is the applicant, any work or construction activity within inland wetland areas or watercourses will require a permit from the Inland Water Resources Division (IWRD) pursuant to section 22a-39(h) of the Connecticut General Statutes (CGS). The CRDA is a public instrumentality regulated by DEEP pursuant to that statute.

It appears that portions of the project area may be within the 100-year flood zone on the community's Flood Insurance Rate Map. There are flood zones associated with the drainage ditch to the west as well as the tributary of Pewterpot Brook to the east. If any construction activity is proposed within the 100-year flood zone and OPM is the applicant, the project must be certified by the sponsoring agency as being in compliance with flood and stormwater management standards specified in section 25-68d of the CGS and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA) and receive approval from the Department. Because the CRDA is not a state department, institution or agency, it is not subject to flood management certification pursuant to section 25-68d of the CGS, even if activities are proposed within the 100-year flood zone.

Stormwater discharges from construction sites where one or more acres are to be disturbed require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects, such as this project, disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. The SWPCP must include measures such as erosion

and sediment controls and post construction stormwater management. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit. For further information, contact the division at 860-424-3018. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

The DEEP Natural Diversity Data Base (NDDB) confirms that potential impacts to grassland bird species listed by the State, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern at Rentschler Field have been addressed by the previously executed mitigation agreement and incidental taking determination. The 2006 EIE also indicated that state endangered long-eared owls (*Asio otus*) were observed using the site for a winter roost. It appears that the project area contains conifers, so if the proposed clearing is performed between October 1 and May 1, a qualified ornithologist should conduct a survey to confirm that the owls are not present. If roosting owls are identified, the NDDB should be contacted so that a mitigation plan can be developed. Finally, the EIE also reported the eastern box turtle as occurring near wetland area D, east of the project area. The mitigation measures to protect the turtles discussed in the EIE should be employed during construction.

In order to review the conditions and suitability of the new 10-acre parcel for parking and roadway development, the Remediation Division would need to see a summary of the Environmental Site Assessment focused on the Potential Areas of Concern for releases of contaminants and the status of those releases in relation to the Remediation Standard Regulations (sections 22a-133k-1 through 3 of the RCSA). Maurice Hamel is the appropriate contact; he may be reached at 960-424-3787 or maurice.hamel@ct.gov.

Thank you for the opportunity to review this project. If there are any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD
Jeff Caiola, DEEP/IWRD
Robert Gilmore, DEEP/IWRD
Maurice Hamel, DEEP/RD
Dawn McKay, DEEP/NDDB