



# Connecticut State University System

39 Woodland Street ■ Hartford, CT 06105-2337 ■ 860-493-0000 ■ www.ctstateu.edu

August 18, 2011

The Honorable Benjamin Barnes, Secretary  
Office of Policy and Management  
450 Capitol Avenue  
Hartford, Connecticut 06106-1308

**Re: Record of Decision for the Western Connecticut State University Midtown and Westside Campus Master Plans, Danbury, CT**

Dear Secretary Barnes:

In accordance with the Connecticut Environmental Policy Act ("CEPA"), the Board of Trustees for the Connecticut State University System, in association with Western Connecticut State University ("WCSU") and the Department of Construction Services ("DCS"), respectfully submits for your review and determination of adequacy the enclosed *Record of Decision for the Western Connecticut State University Midtown and Westside Campus Master Plans, Environmental Impact Evaluation* (January 2011) ("EIE").

The EIE was prepared and circulated in accordance with CEPA. The sponsoring and participating agencies have taken into consideration the findings of the EIE, the comments received on the document, as well as other pertinent information. All practical means to avoid or minimize environmental harm have been adopted. On the basis of the assembled record, the Board of Trustees has decided to proceed with implementation of the proposed action while incorporating the mitigation measures indicated.

Please do not hesitate to contact Mr. Keith Epstein, Assistant Vice Chancellor for Planning and Technical Services at (860) 493-0061, if you require additional information in order to make such a determination.

Sincerely,

Louise H. Feroe  
Acting Chancellor

Enclosures

cc: James W. Schmotter, President WCSU  
Ms. Pamela J. Kedderis, Vice Chancellor for Finance and Administration  
Keith Epstein, Assistant Vice Chancellor for Planning and Technical Services  
Peter J. Visentin, Director, WCSU  
Jeff Bolton, Supervising Environmental Analyst, DCS  
Karl Wagener, Executive Director, Council on Environmental Quality  
David Fox, Department of Energy and Environmental Protection

**CONNECTICUT STATE UNIVERSITY SYSTEM**

# **RECORD OF DECISION**

*Prepared in accordance with the Connecticut Environmental Policy Act*

## **Western Connecticut State University Midtown and Westside Campus Master Plans**

Danbury, Connecticut  
State Project No. BI-RD-226



**AUGUST, 2011**

**Participating Agencies:**

State of Connecticut Department of Construction Services  
Western Connecticut State University

State of Connecticut  
Connecticut State University System  
Western Connecticut State University  
Midtown and Westside Campus Master Plans  
Danbury, Connecticut

**Record of Decision**

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(Baystate Environmental Consultants, Inc., January, 2011)

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Affidavits

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## **I. DECISION**

The Connecticut State University System (CSUS) and the participating agencies, intend to continue with implementing the Proposed Action, which is the implementation of the 2007 Master Plans for the Midtown and Westside Campuses of Western Connecticut State University in Danbury, Connecticut. This decision is based upon the *Environmental Impact Evaluation* (EIE) (Baystate Environmental Consultants, Inc., January, 2011) that was prepared for the Proposed Action and the comments received during the public review period for the EIE (January 18 - March 4, 2011). A copy of the EIE's Executive Summary is included as Attachment A.

## **II. STATEMENT OF ENVIRONMENTAL IMPACT**

There will be no significant impacts to the environment as a result of the Proposed Action. All practicable means to avoid or minimize environmental harm have been adopted. The mitigation measures identified in the EIE and, where applicable, the responses to comments, have been adopted.

## **III. SUMMARY OF CONSULTATION WITH AGENCIES AND OTHER PERSONS**

Consultation with various agencies and other persons was initiated as part of the early public scoping process which began on May 5, 2009 with the publication of a scoping notice and notice of scoping meeting in the *Environmental Monitor* (Attachment B). The purpose of the notice was to inform and solicit comments from agency reviewers and other interested parties of the Proposed Action. The public comment period ended on June 4, 2009.

Written comments were provided during the scoping period (see Attachment B). The only comments received were from the Department of Environmental Protection (DEP), the Department of Public Health (DPH) and the State Historic Preservation Office (SHPO).

During the preparation of the document all agencies with regulatory authority over resources located within the project study area as well as agencies that would be potentially affected by the project, such as the Connecticut Commission on Culture and Tourism (CCCT), State Traffic Commission (STC) and the City of Danbury were contacted as part of project coordination.

A notice of availability for the EIE and notice for a public hearing was advertised in the *Environmental Monitor* on January 18, 2011 and was also advertised in the Danbury News on January 18, 25 and February 1, 2011 (see Attachment C). The public review and comment period closed on March 4, 2011. The EIE was available for inspection during the entire comment period at the Danbury Public Library, the State Office Building - DPW in Hartford Office and on the Connecticut State University System's web site.

Written comments were submitted by three agencies during the public review period (see Attachment D). They are: DEP, DPH (2 letters), and the U.S. Army Corps of Engineers (USACE). There were no comments from local government agency/department or citizens.

Responses to all substantive comments are included as Attachment D.

**ATTACHMENT A**

*Environmental Impact Evaluation*  
Executive Summary

## **EXECUTIVE SUMMARY**

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Project Name:	Environmental Impact Evaluation for the Proposed Master Plan at Western Connecticut State University
CT DPW Project No.:	BI-RD-226
Location:	Danbury, CT
Sponsoring Agency:	Board of Trustees for the Connecticut State University System
Participating Agencies:	Connecticut Department of Public Works and Western Connecticut State University
Prepared by:	Baystate Environmental Consultants, Inc.
Date:	January, 2011

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### **INTRODUCTION**

The Connecticut State University System (CSUS), in consultation with the Connecticut Department of Public Works (DPW) and Western Connecticut State University (WCSU or The University) as participating agencies, has proposed to implement the 2007 Campus Master Plan prepared by Symmes Maini & McKee Associates (SMMA). The Master Plan encompasses both of WCSU's campuses, the Midtown campus in downtown Danbury, Connecticut and the Westside campus, about 2¼ miles west of Midtown. The Master Plan proposes a major circulation reorganization, construction of new classroom buildings, residence halls, parking garages, a wellness center and reorganization of athletic facilities.

The Master Plan addresses accommodations for programmatic and facilities' requirements of the University in 2015. However, many of the Master Plan elements described in this document will not be completed or even initiated by 2015, therefore the actual implementation date of the Master Plan will likely be well beyond this assumed planning year. Nevertheless, projections to the planning year of 2015 related to student enrollments, staffing, and utility demand forecasts have been used in this Environmental Impact Evaluation (EIE).

This EIE has been prepared in accordance with the Connecticut Environmental Policy Act (CEPA), as promulgated under Section 22a-1 to 22a-1h of the Connecticut General Statutes (CGS) and as amended by Public Act 02-121. Under CEPA, an EIE is required for this State Action because the site includes construction in excess of 100,000 square feet (sf) of floor space and more than 200 parking spaces.

The Connecticut Department of Environmental Protection (DEP) has reviewed the Notice of Scoping for preparation of an EIE for various Master Plan projects at both the

Midtown and Westside Campuses at Western Connecticut State University. A letter from DEP, dated June 4, 2009 (Appendix A), outlines recommendations for the Master Plan. These recommendations were taken into account while reviewing the Master Plan. The Connecticut Department of Public Health (DPH) also reviewed and commented on the Notice of Scoping for the WCSU Master Plan.

## **PURPOSE AND NEED**

Prior to the preparation of the Campus Master Plan, a *Program for the Master Plan* was prepared by Paulien and Associates, Inc. (February 2007). This document gives tabulated campus-wide, specific academic and administrative space requirements for WCSU based on target goals of estimated enrollment, staff increases and other relevant academic program data (Paulien and Associates, 2007). Paulien & Associates analyzed existing University-owned space and applied appropriate guidelines to determine current and future space needs using predetermined target enrollments for each campus and staffing growth for each major Administrative Unit.

A space needs analysis was conducted as Phase I of the campus Master Planning effort. Phase II addressed the physical responses to the Phase I analysis. Estimates were made of space amounts likely to be needed by various units of the University. According to the analysis, WCSU intends to grow by an average of 27.20% in student enrollment by the target year of 2015 (Paulien and Associates, 2007).

The University's long term goal is to be the state's public liberal arts institution. The University has become primarily a residential college by housing 70% of its undergraduate population on campus. The University cannot achieve this goal without adequate provisions for housing and learning facilities for the growing number of students, faculty, and staff.

## **PROJECT DESCRIPTION**

Western Connecticut State University (WCSU) is located in Danbury, a city in Fairfield County located approximately 65 miles northeast of Manhattan and 55 miles southwest of Hartford. The University was founded in 1903 and consists of two campuses, the Midtown Campus and Westside Campus. The University intends to undertake a major series of phased building construction projects and renovations in accordance with the 2007 Master Plan by SMMA at both campuses. Also, a major reconfiguration of pedestrian circulation is planned at both campuses as part of the Master Plan. Central quadrangles are proposed for both campuses to create a more cohesive campus environment.

The Midtown Campus is WCSU's original campus of 34 acres and is located in downtown Danbury. It is home to most of the undergraduate programs and includes fourteen buildings mostly dedicated to the Arts & Sciences and the School of Professional Studies. The residential halls at the Midtown Campus, Litchfield, Newbury and Fairfield Hall, are traditional dormitory-style units. Parking is provided by two on-

campus parking garages and a series of multiple smaller lots targeted for faculty and staff.

The University's second campus, the Westside Campus, encompasses 355 acres and is located 2 ¼ miles to the west of the Midtown Campus. The Westside Campus consists of a Classroom Building, Campus Center building, the O'Neill Center, Charles Ives Performance Center, football stadium, baseball field, softball field, other recreation fields, and three residential complexes. The Westside Campus residential halls, Ella Grasso, Pinney and Centennial Halls, are suite and apartment style housing for upper division students. Parking is provided by surface lots and a parking garage structure behind Centennial Hall. General surface parking is provided along portions of University Boulevard and in ancillary lots adjacent to buildings.

Figure ES-1 presents the locations of the respective campuses. The preferred Master Plans for each campus are shown in Figures ES-2 and ES-3.

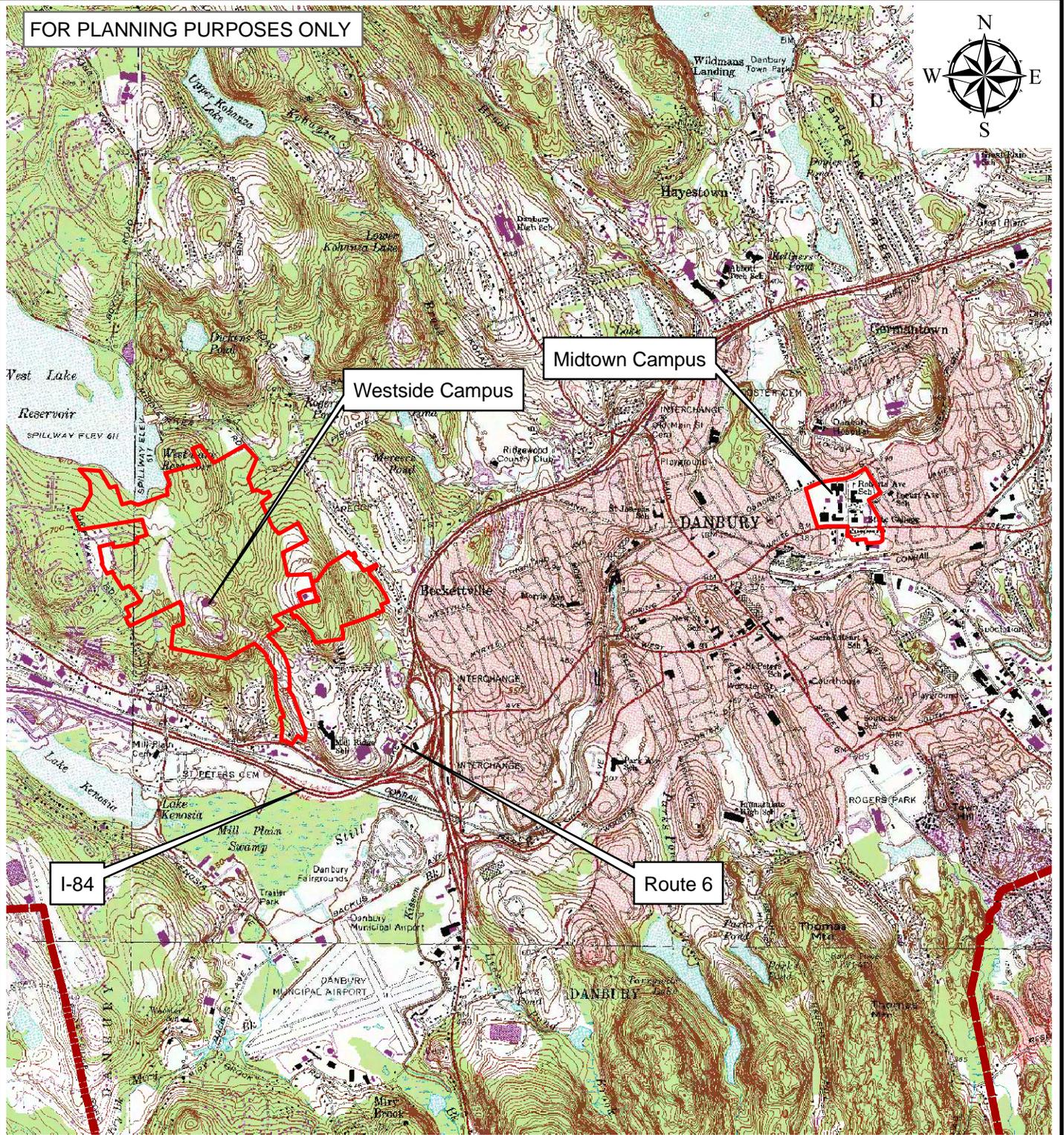
Several of the buildings that would be either newly constructed or renovated as part of the Master Plan would be required to meet DPW's *High Performance Building Guidelines* (DPW, 2010) and qualify for a LEED® Silver certification. Three buildings most recently constructed at WCSU were built to the USGBC LEED® standards. They include Centennial Hall and the Campus Center at the Westside Campus, and the Science Building at Midtown Campus.

LEED® is an internationally recognized green building certification system developed by the U.S. Green Building Council (USGBC). It was formed to provide third-party verification that a building or community was designed and built using strategies aimed at improving performance across all the metrics that matter most: energy savings, water efficiency, carbon dioxide (CO<sub>2</sub>) emissions reduction, improved indoor environmental quality, and stewardship of resources and sensitivity to their impacts (USGBC, 2009).

Under the State Building Code of Connecticut, all new buildings except residential buildings with less than five units that are projected to cost \$5 million or more must attain a LEED® Silver rating or an equivalent standard. The same is required of renovation projects that are expected to cost \$2 million or more ([http://bcap-energy.org/files/CT\\_memo\\_to\\_interested\\_parties\\_2009\\_amendment\\_re\\_pa07-242\\_Dec\\_5\\_08.PDF](http://bcap-energy.org/files/CT_memo_to_interested_parties_2009_amendment_re_pa07-242_Dec_5_08.PDF), accessed online 11/9/09). The current version of the LEED rating system was revised in 2009 and is referred to as Version 3.

The following subsections describe the Proposed Action for the two campuses:

FOR PLANNING PURPOSES ONLY



3,000 1,500 0 3,000 Feet

**LOCUS**

Project No:  
15.0166140.10

**LEGEND**

- Campus Property Boundaries
- Town Boundaries

**Western Connecticut State University  
Danbury, Connecticut**

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

CT SEAMLESS TOPO MAPS 1997, USGS TOPOGRAPHIC  
QUADRANGLE MAPS Danbury, Brewster, Bethel, Peach Lake

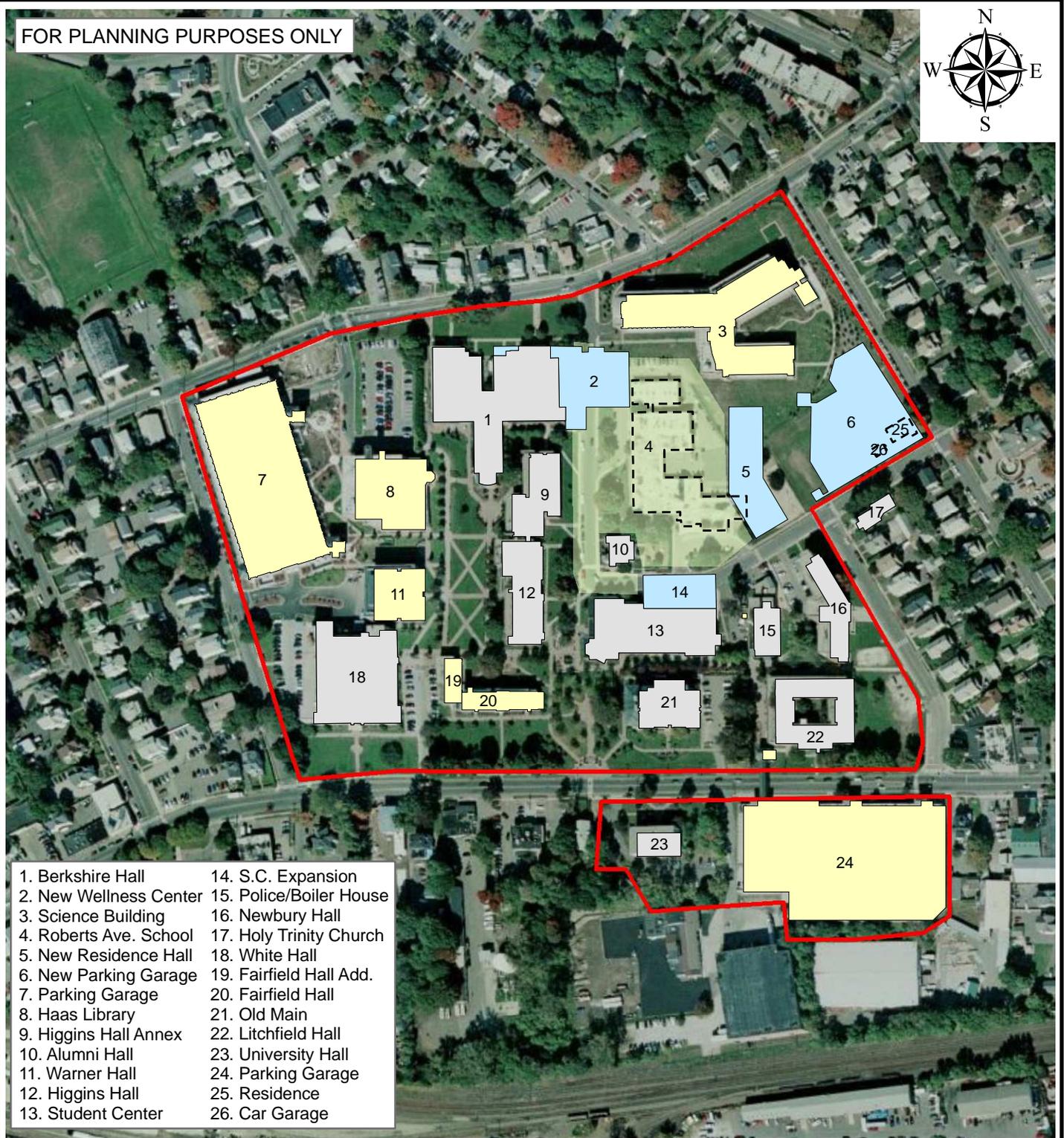
Figure No:

**Baystate Environmental Consultants, Inc.**  
East Longmeadow, MA / Bloomfield, CT

Data obtained from University of Connecticut Map and Geographic  
Information Center and CT Department of Environmental Protection

**ES-1**

FOR PLANNING PURPOSES ONLY



- |                        |                         |
|------------------------|-------------------------|
| 1. Berkshire Hall      | 14. S.C. Expansion      |
| 2. New Wellness Center | 15. Police/Boiler House |
| 3. Science Building    | 16. Newbury Hall        |
| 4. Roberts Ave. School | 17. Holy Trinity Church |
| 5. New Residence Hall  | 18. White Hall          |
| 6. New Parking Garage  | 19. Fairfield Hall Add. |
| 7. Parking Garage      | 20. Fairfield Hall      |
| 8. Haas Library        | 21. Old Main            |
| 9. Higgins Hall Annex  | 22. Litchfield Hall     |
| 10. Alumni Hall        | 23. University Hall     |
| 11. Warner Hall        | 24. Parking Garage      |
| 12. Higgins Hall       | 25. Residence           |
| 13. Student Center     | 26. Car Garage          |

300 150 0 300 Feet

**PREFERRED ALTERNATIVE**

Project No:  
15.0166140.10

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

Exhibit

**LEGEND**

- Existing Buildings
- Proposed Demolition
- Proposed Renovation
- Proposed Buildings
- Proposed Campus Quadrangle

**Western Connecticut State University  
Midtown Campus  
Danbury, Connecticut**

**ES-2**

## Midtown Campus

The Proposed Action for the Midtown campus includes the following, as described in SMMA (2007). Priority projects slated for construction in the near term are shown in italics:

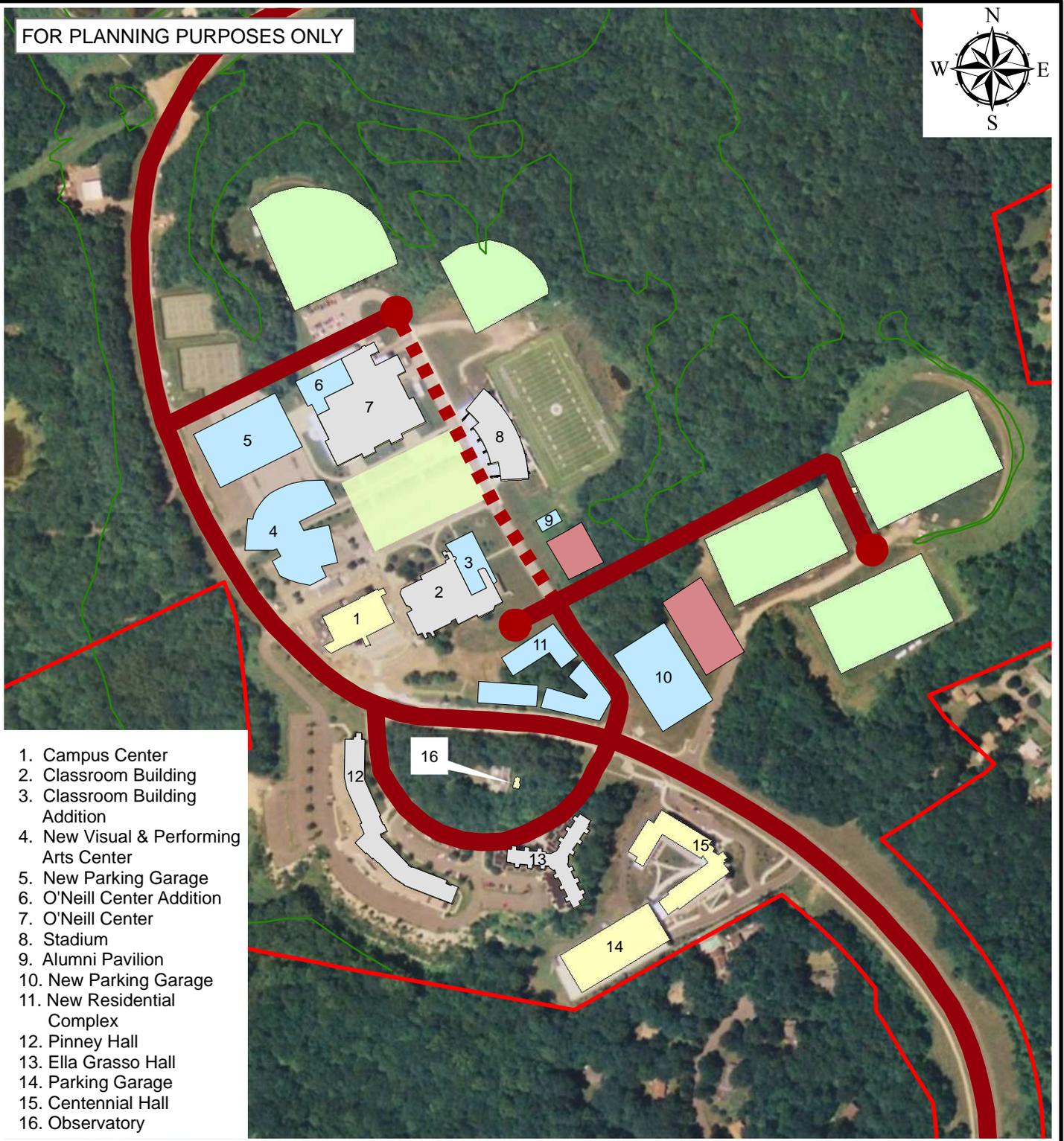
- *Construction of a new 300-bed residence hall with 400-car parking garage and associated mini-chiller plant;*
- *Demolition of an existing University-owned residence at 30 Ninth Avenue within the footprint of the proposed residence hall and parking garage*
- Central plant improvements including new boiler and relocation of Police Station to White Hall;
  
- Renovation and expansion of Berkshire Hall, creating space for School of Professional Studies and new Wellness Center, expanded daycare;
- *Demolition of the vacant Roberts Avenue School, closure of Seventh Avenue and the western portion of Roberts Avenue, and construction of new main quadrangle;*
- Renovation and expansion of the Student Center;
- Renovation of White Hall;
- Renovation of Higgins Hall;
- Renovation and refurbishment of Old Main;
- Renovation and refurbishment of Alumni Hall;
- Renovation and refurbishment of Litchfield Hall;
- Renovation and refurbishment of Newbury Hall;
- Renovation and refurbishment of the Holy Trinity Church; and
- Renovation and refurbishment of University Hall.

## Westside Campus

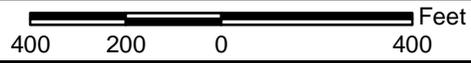
The Proposed Action for the Westside campus includes the following, (Figure ES-3) as described in SMMA (2007). Priority projects slated for construction in the near term are shown in italics:

- *Construction of a new building for the School of Visual and Performing Arts;*
- Parking modifications including a new 500-car parking garage to accommodate relocated parking lost due to changes to student, faculty, and commuter lots and one staff lot with a mini-power plant for future buildings;
- Vehicular pedestrian enhancements;
- Creation of a central quadrangle between Classroom Building, Stadium, and Arena;
- Renovate and add space onto Feldman Arena located within the O'Neill Center;
- Renovate and expand Westside Classroom Building;
- Construction of a new Residential Complex to house 394 students with landscaped open quadrangle;

FOR PLANNING PURPOSES ONLY



1. Campus Center
2. Classroom Building
3. Classroom Building Addition
4. New Visual & Performing Arts Center
5. New Parking Garage
6. O'Neill Center Addition
7. O'Neill Center
8. Stadium
9. Alumni Pavilion
10. New Parking Garage
11. New Residential Complex
12. Pinney Hall
13. Ella Grasso Hall
14. Parking Garage
15. Centennial Hall
16. Observatory



**PREFERRED ALTERNATIVE - WESTSIDE**

Project No:  
15.0166140.10

**LEGEND**

- Primary Vehicular Route
- Secondary Vehicular Route
- Wetland- Estimated by BEC
- Proposed Surface Parking
- Proposed Renovated Buildings
- Proposed Buildings
- Existing Buildings
- Proposed Athletic Fields
- Proposed Quadrangle
- Property Boundary

**Western Connecticut State University  
Westside Campus  
Danbury, Connecticut**

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

Figure No:

**ES-3**

- Construction of a new 500-car parking garage near the stadium with associated mini-power plant;
- Renovation of the O’Neill Center, replacement of the football stadium turf, refurbishment of the stadium, and construction of new field complexes for baseball and softball;
- Expansion of student activity and food service space;
- Renovation and refurbishment of Ella Grasso Hall; and
- Renovation and refurbishment of Pinney Hall; and,
- Construction of Alumni Pavilion
- 

The estimated cost to implement the entire Master Plan at both campuses is \$400 million (2007 dollars).

### **ALTERNATIVES CONSIDERED**

As required by CEPA, alternatives to the Proposed Action (i.e. The Preferred Plan as described above) have been identified and evaluated in this EIE. The alternatives considered include the Preferred-Plan Alternative, the No-Build Alternative and several alternatives that evolved during the Master Planning process.

#### **No Build Alternative**

Under the No-Build Alternative, the University would not meet the projected need for additional facilities based on the University’s Master Plan’s target year on-campus full-term equivalent (FTE) of 5,752 students, a 27% increase over the base year (2005). Based on the projected increase of student enrollment, there is a demand for more student housing, classroom space, expanded sports facilities, improvements to pedestrian and vehicular circulation and increased parking at both campuses.

Environmental impacts that would be avoided by not providing campus build-out according to the Master Plan include an increase in stormwater runoff rates (at Westside Campus only), wetland impacts, potential water quality impacts, and traffic related impacts. Some of these impacts are associated with relocation of the athletic fields and addition of the parking garage. No improvements to traffic, parking and circulation would result from the No-Build Alternative.

#### **Other Build Alternatives**

The Campus Master Plan (SMMA 2007) identifies three additional concepts that include the same project elements as the Preferred Plan, but have different spatial configurations. The alternatives development process was an iterative one in which program elements were reviewed with respect to environmental conditions. The CSUS has judged these alternatives to be inferior to that of the Preferred Plan for each campus based upon a variety of factors including, primarily: facility synergies, vehicular and pedestrian safety, and environmental impacts.

## ENVIRONMENTAL IMPACTS AND MITIGATION

As required under CEPA, impacts to the physical, natural and socioeconomic environment of the Proposed Action (Master Plan) have been evaluated in this EIE. Table ES-1 summarizes the environmental impacts of the Proposed Action for each campus.

## POTENTIAL CERTIFICATES, PERMITS OR APPROVALS

The following table is a list of approvals that may be required for the construction and operation of the proposed Master Plan facilities.

**Table ES-2. Potential Certificates, Permits or Approvals Needed for WCSU Master Plan Implementation**

Certificate, Permit, or Approval	Reviewing Agency	Comments
General Permit for Discharge of Stormwater and Dewatering Wastewater Associated with Construction Activities	DEP	For $\geq 1$ acres of disturbance. Registration and if $>10$ acres a plan review is required prior to initiating activities.
Flood Management Certification Section 25-68 CGS	DEP	New or modification to stormwater drainage or development in a floodplain requires certification of compliance with Section 25-68 CGS and 225-68h-3 of RCSA by state agency.
Soil and Special Waste Disposal Approvals	DEP	May be required for disposal of waste generated during utility relocation or demolition activities
State Wetlands Permit	DEP	Would apply to such activities encroaching on wetlands: new or rehabilitated stormwater outfall structures; construction of new softball, baseball and soccer fields; road near Stadium.
Section 404 Wetlands Permit	USACE	Construction of new softball, baseball and soccer fields; road near Stadium.
Utility Relocation Plan review and approval	DEP, City of Danbury	Review required before relocating/installing utilities
Water Diversion Permit	DEP	May be required for new stream crossings or culvert replacements for watersheds of $>100$ acres.
State Traffic Commission (STC) Certificate	STC	Required for existing STC facilities with $> 50$ parking spaces or more than 1 SF of new construction. Modification of existing permits at both campuses.

**Table ES-1. Summary of WCSU Master Plan Environmental Impacts for Midtown and Westside Campuses**

<b>Parameter</b>	<b>Midtown</b>	<b>Westside</b>
Geology, Soils & Topography	No major alterations required	Blasting and other significant earth work required for construction
Wetlands	No wetland impacts	Approximately 1,300-9,800 sf of impact to forested wetland due to ballfield and roadway construction. Wetland mitigation sites available near existing baseball field.
Groundwater Quality	Stormwater infiltration proposed where suitable	Groundwater quality not affected; limited potential for groundwater infiltration of stormwater. Pollutants within APA with BMPs in accordance with DEP and DPH regulations/standards.
Surface Water Quality	Decrease in impervious surfaces	Increased impervious surface runoff to be mitigated by stormwater BMPs
Floodplains	Campus not within floodplain	Campus not within floodplain
Flora/Fauna Habitats	Existing habitats have minimal value to flora/fauna	Slight decrease in forest habitat but only along existing edges that are already impacted.
Rare Species	No state or federally listed species affected	No state or federally listed species affected
Transportation	Increased vehicular delay at intersections already at unacceptable Levels of Service (LOS) – White Street @ Fifth Avenue and Osborne Street @ Fifth Avenue.	Lighting/Markings required for VPAC per FAA letter. Similar mitigation may be required for new residential complex, parking garage and building additions.
Air Quality	Slight increase in air emissions due to increased energy demand	Slight increase in air emissions due to increased energy demand
Noise	No significant increase in noise; construction noise BMPs to be instituted	No significant increase in noise; construction noise BMPs to be instituted
Light	Additional lighting along campus perimeter required but impacts to be minimized through selection of appropriate fixtures	Additional lighting along campus perimeter required but impacts to be minimized through selection of appropriate fixtures
Water Supply	Slight increase in potable water demand easily met by Danbury Water Department	Slight increase in potable water demand easily met by Danbury Water Department
Wastewater	Additional sewage generation handled by Danbury Water Pollution Control Authority	Additional sewage generation handled by Danbury Water Pollution Control Authority
Electricity & Telecommunications	Utilities are available in close proximity to proposed projects. Berkshire Building/Wellness Center Expansion and Student Center Addition will likely require relocation of utilities.	VPA parking garage, O’Neill Center Addition and new Residence Hall will likely require utility relocations.
Heating & Cooling	An additional boiler and renovations to the boiler house needed to handle the increased size in service	New decentralized heating/cooling units and/or upgrades required for each Master Plan structure.

<b>Parameter</b>	<b>Midtown</b>	<b>Westside</b>
	for the proposed buildings. Cooling plants would be incorporated within the new 400-car parking structure or renovated Police Station to service many of the new buildings.	The feasibility of constructing a geothermal exchange system for the VPAC is being studied.
Aesthetics/Viewsheds	Ninth Ave. residents will have direct view of new parking garage. Impacts minimized through architectural treatments similar to those employed for parking garage along 5 <sup>th</sup> Avenue	New structures not likely visible from residential developments in the area.
Solid Waste and Recycling	Additional solid waste generated during construction and operation handled by current system under the University's Waste Management Guidelines.	Additional solid waste generated during construction and operation handled by current system under the University's Waste Management Guidelines.
Cultural Resources	No significant impact to historic properties, but SHPO will be contacted during the design phase of projects that affect State Register properties on campus. No archaeologically sensitive resources in project area.	No significant impact to historic properties. No archaeologically sensitive resources in project area.
Pesticides, Toxic or Hazardous Materials	No major sources of hazardous materials in project area. Roberts Ave. school lead paint to be abated during demolition.	Encountering contaminated soil and/or groundwater at the Westside Campus is highly unlikely.
Energy	Increased energy usage but most buildings will be LEED® certified and, therefore, energy efficient.	Increased energy usage but most buildings will be LEED® certified and, therefore, energy efficient.
Public Health & Safety	Additional campus security may be needed. No additional City emergency personnel required.	Additional campus security may be needed. No additional City emergency personnel required.
Consistency with Land Use Plans	Master Plan is consistent with local, state and regional plans	Master Plan is consistent with local, state and regional plans
Population, Economy, Employment & Income	Increase in student population living on campus. Positive effect on employment during construction and operation	Increase in student population living on campus. Positive effect on employment during construction and operation
Housing	Increase in student housing stock.	Increase in student housing stock.
Consistency with Environmental Equity Policy	No disproportionate negative effects on low or minority income populations.	No disproportionate negative effects on low or minority income populations.

## **CONCLUSIONS**

The Proposed Action is the implementation of the WCSU Master Plans for the Midtown and Westside Campuses. The Proposed Action would have no significant-negative impacts to the natural, physical or socioeconomic environment in or around the WCSU campuses so long as mitigation measures related to stormwater/water quality, wetlands and traffic are implemented as stated in this report. Additional detail, which will be developed during the design and permitting process, will be needed to better define impacts and mitigation requirements.

## **EIE REVIEW PERIOD AND COMMENTS**

Review Agencies and other interested parties are offered an opportunity to provide comments and other pertinent information that would help define environmental impacts, interpret the significance of such impacts, and evaluate alternatives.

Written comments on this document and any other pertinent information must be sent or postmarked by March 4, 2011. Comments must be sent to:

Keith Epstein  
Assistant Vice Chancellor for Planning and Technical Services  
Connecticut State University System  
39 Woodland Street  
Hartford, CT 06105-2337

Fax: (860) 493-0059  
Email: [epsteink@ct.edu](mailto:epsteink@ct.edu)

The sponsoring and participating agencies will review all such materials submitted by that time and will prepare responses to the substantive issues raised. Based on the EIE and the comments received during the EIE public review period, the CSUS in consultation with WCSU and DPW will submit a Record of Decision (ROD) to the State Office of Policy and Management (OPM) which will review the documentation, including responses to comments, and make a written determination as to whether the EIE is adequate.

## **DISTRIBUTION**

U.S. Army Corps of Engineers  
Council on Environmental Quality  
Connecticut Department of Environmental Protection  
Connecticut Department of Public Health  
Connecticut Department of Transportation  
Connecticut Office of Policy and Management  
Connecticut State Historic Preservation Office  
Connecticut State Traffic Commission  
Federal Aviation Administration  
Housatonic Valley Council of Elected Officials  
Danbury Public Library  
City Clerk – Danbury  
City Engineer – Danbury  
City Planner – Danbury  
Office of the Mayor - Danbury  
State Representative Robert Godfrey  
State Representative Daniel Carter  
State Representative Joseph Taborsak  
State Senator Michael McLachlan

**ATTACHMENT B**

Early Public Scoping Notice and Comments

# 1. Notice of Scoping: 2007 Comprehensive Campus Master Plan for Western Connecticut State University

**Municipality where proposed project might be located:** Danbury

**Address of Possible Project Location:** Westside Campus (Lake Avenue), and Midtown Campus (181 White Street)

## **Project Description:**

The Board of Trustees for the Connecticut State University System (CSUS) proposes to implement a program of improvements to the Midtown and Westside Campuses at Western Connecticut State University (WCSU) (the "Preferred Plans"). These improvements have been released as part of the approved *2007 Comprehensive Campus Master Plan for Western Connecticut State University*, prepared by Symmes Maini & McKee Associates, Inc. in September 2007. The primary goals and objectives of the improvement program are to:

- Renovate, upgrade, replace, and expand existing facilities;
- Relocate functions in existing or new facilities in coordination with the WCSU's space utilization study;
- Unify and consolidate core uses of the campus;
- Utilize existing resources, building on existing strengths, and reinforcing the positive image of the University, community, and State; and
- Provide a development strategy that establishes need, priority, schedule, and cost effective solutions to the University's and existing and future needs.

The Campus Plan would be implemented through various projects on campus providing new or renovated academic, administrative, athletic and residential space, new parking garages, landscaping, new quadrangles, linkage of exterior spaces throughout the campus, and demolition of some existing structures.

The Westside Campus project improvements would likely include the following (with approximate gross square feet noted):

- New Visual and Performing Arts Center with 170,000 gross square feet (gsf) of floor space;
- Three residence halls, each with floor space measuring 60,000 gsf and with a total capacity of 394 residents;
- Addition to the Classroom Building of 51,000 gsf;
- Addition to the O'Neill Center of 25,000 gsf;
- Two parking garages (one with an associated mini-power plant), each with a capacity for 500 cars;
- Closing of a portion of University Boulevard and redirection of vehicular and pedestrian flow;

The Midtown Campus project improvements would likely include the following:

- New Wellness Center (attached to Berkshire Hall), with 39,000 gsf of floor space;
- Addition to the Student Center of 33,000 gsf;
- One new residence hall, with floor space measuring 138,000 gross square feet (gsf) and a capacity of 300 residents;
- One new parking garage (and associated chiller plant) with a capacity for 400 cars;

- Demolition of the Roberts Avenue Elementary School and closing of the associated street.
- Demolition of the Richa House and associated garage.

To implement these improvements, the 2015 Campus Master Plan Update is being proposed as part of this EIE. Below are the preferred conceptual plans for each campus.

**Project Figures: \_\_\_\_\_ Low Resolution**

[Project Vicinity Map](#) (6 MB)    [low res](#) (817 kb)

**Westside Campus:**

[Existing Conditions](#) (6.8 MB)    [low res](#) (687 kb)

[Preferred Plan](#) (2 MB)    [low res](#) (544 kb)

**Midtown Campus:**

[Existing Conditions](#) (1 MB)    [low res](#) (566 kb)

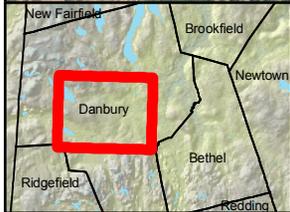
[Preferred Plan](#) (1.2 MB)    [low res](#) (615 kb)

**Written comments from the public are welcomed and will be accepted until the close of business on: **June 4, 2009.****

**Any person can ask the sponsoring agency to hold a Public Scoping Meeting by sending such a request to the address below. If a meeting is requested by 25 or more individuals, or by an association that represents 25 or more members, the sponsoring agency shall schedule a Public Scoping Meeting.**

**Written comments and/or requests for a Public Scoping Meeting should be sent to:**

**Name:** Keith Epstein, AIA  
**Title:** Assistant Vice Chancellor for Planning and Technical Services  
**Agency:** Connecticut State University System  
**Address:** 39 Woodland Street  
Hartford, Connecticut 06105  
**Fax:** 860-493-0059  
**E-Mail:** [epsteink@ct.edu](mailto:epsteink@ct.edu)



For planning purposes only.

Sources: 2006 NAIP aerial; 2008 TeleAtlas; approximate property boundaries estimated from Vision Appraisal's Online Database for Danbury, CT, updated 09-10-08 (Middtown Campus) and from Luchs "proplines.dwg", 09-24-02 (Westside Campus).

Printed in color. Prepared by: RAC  
Date: 11-13-08

**Legend**

 Approx. Property Boundary



State Plane Coordinate System of 1983, Zone 3526  
Lambert Conformal Conic Projection  
North American Datum of 1983



**SITE LOCUS MAP**

**WESTERN CONNECTICUT STATE UNIVERSITY**

181 White Street  
Danbury, Connecticut



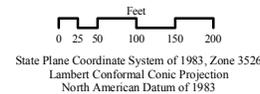
For planning purposes only.

Sources: 2006 NAIP aerial; 2008 TeleAtlas; approximate property boundary estimated from Vision Appraisals' Online Database for Danbury, CT, updated 09-10-08.

Printed in color. Prepared by: RAC  
Date: 11-13-08

**Legend**

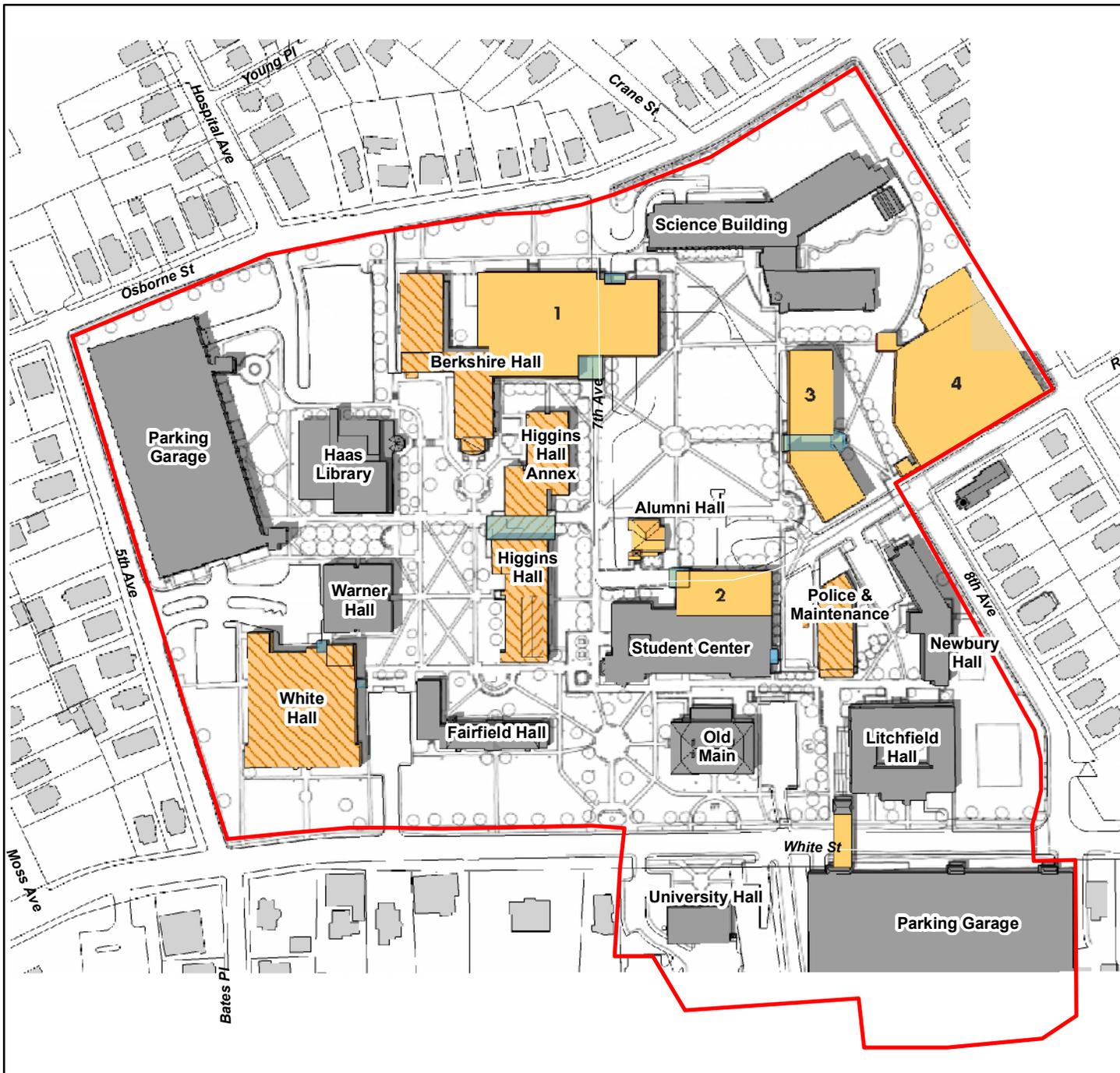
 Property Boundary



**Existing Midtown Campus**

**WESTERN CONNECTICUT STATE UNIVERSITY**

181 White Street  
Danbury, Connecticut



**LEGEND**

- Approximate Property Boundary
- Existing Buildings
- Phase I Buildings
- Renovation

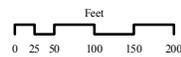
**BUILDING KEY**

1. New Wellness Center (38,886 gsf)
2. Student Center Expansion (33,400 gsf)
3. New Residence Hall (300 bed, 137,775 gsf)
4. New Parking Garage & associated chiller plant (400 car, 132,000 gsf)

For planning purposes only.

Sources: 2008 Master Plan (SMMA); 2008 TeleAtlas; approximate property boundary estimated from Vision Appraisal's Online Database for Danbury, CT, updated 09-10-08.

Printed in color. Prepared by: RAC  
Date: 11-21-08



State Plane Coordinate System of 1983, Zone 3526  
Lambert Conformal Conic Projection  
North American Datum of 1983



**2008 Midtown Master Plan  
Preferred Plan**

**WESTERN CONNECTICUT STATE UNIVERSITY**  
181 White Street  
Danbury, Connecticut



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC WORKS



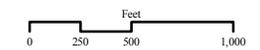
For planning purposes only.

Sources: 2006 NAIP aerial; 2008 TeleAtlas; property boundary from Luchs "proplines.dwg", 09-24-02.

Printed in color. Prepared by: RAC  
Date: 11-21-08

**Legend**

Property Boundary

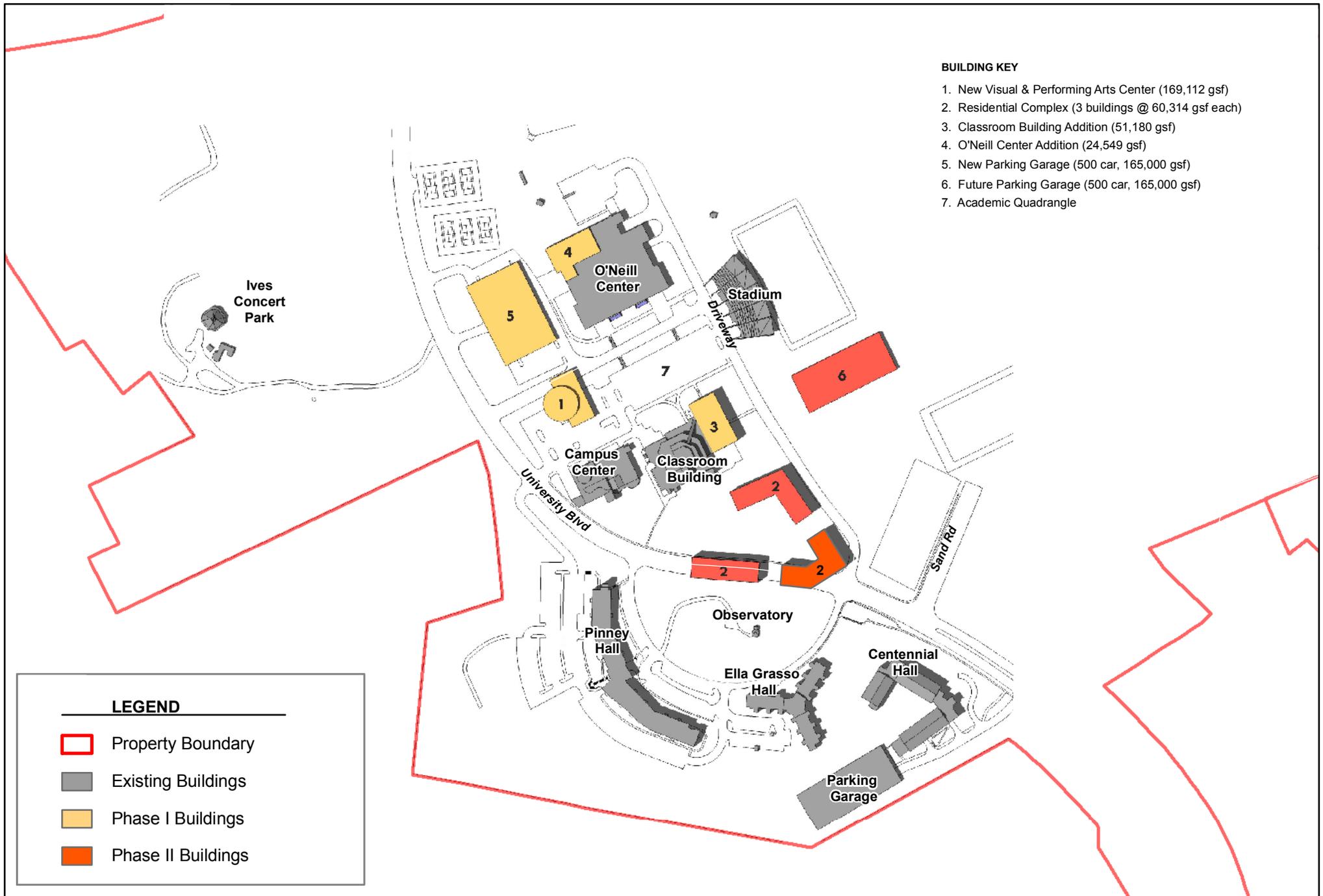


State Plane Coordinate System of 1983, Zone 3526  
Lambert Conformal Conic Projection  
North American Datum of 1983



**Existing Westside Campus**

**WESTERN CONNECTICUT STATE UNIVERSITY**  
181 White Street  
Danbury, Connecticut



**BUILDING KEY**

- 1. New Visual & Performing Arts Center (169,112 gsf)
- 2. Residential Complex (3 buildings @ 60,314 gsf each)
- 3. Classroom Building Addition (51,180 gsf)
- 4. O'Neill Center Addition (24,549 gsf)
- 5. New Parking Garage (500 car, 165,000 gsf)
- 6. Future Parking Garage (500 car, 165,000 gsf)
- 7. Academic Quadrangle

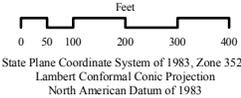
**LEGEND**

-  Property Boundary
-  Existing Buildings
-  Phase I Buildings
-  Phase II Buildings

For planning purposes only.

Sources: 2008 Master Plan (SMMA); 2008 TeleAtlas; property boundary from Luchs "proplines.dwg", 09-24-02.

Printed in color. Prepared by: RAC  
Date: 11-21-08



**2008 Westside Master Plan Preferred Plan**

**WESTERN CONNECTICUT STATE UNIVERSITY**  
181 White Street  
Danbury, Connecticut





STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

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**To:** Keith Epstein, AIA - Assistant Vice Chancellor for Planning & Technical Services  
Connecticut State University System, 39 Woodland Street, Hartford

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

**Date:** June 4, 2009      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** Western Connecticut State University, Danbury

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The Department of Environmental Protection has reviewed the Notice of Scoping for preparation of an Environmental Impact Evaluation (EIE) for various Master Plan projects at both the Midtown and Westside Campuses at Western Connecticut State University. The following commentary is submitted for your consideration.

A portion of the Westside Campus is within the Aquifer Protection Area (APA) on the Final Level A mapping for the Danbury Water Department's Lake Kenosia wellfield (see attached map). The Department will regulate activities by State agencies within this boundary pursuant section 22a-354p(g)(1)(D) of the Connecticut General Statutes (CGS). It appears that the proposed Visual & Performing Arts Center, the parking garage west of the O'Neill Center and the westernmost portion of one of the residential halls are within the APA. No new regulated activity, as defined by section 22a-354i-1(34) of the Regulations of Connecticut State Agencies (RCSA), should be proposed within the APA. The APA Land Use Regulations can be found on-line at: <http://www.ct.gov/dep/lib/dep/regulations/22a/22a-354i-1through10.pdf>

With one possible exception, it does not appear that the proposed projects would be regulated activities. The scoping notice lists a mini-power plant at one of the two proposed garages. The generation of electricity using fossil fuels other than natural gas or propane should not be proposed at the western garage, which is within the APA. In addition, it is not known whether hazardous materials would be utilized at the performing arts center, during set construction for example. Although such use would not be prohibited, the storage and handling of any hazardous material should be done in conformance with the Best Management Practices specified in section 22a-354i-9 of the RCSA. The scoping notice also indicates that vehicular flow will be redirected at the campus. If there are any new or reconstructed roadways proposed within the APA, stormwater should be managed in accordance with the attached draft guidelines. The EIE should confirm that no regulated activities are proposed within the APA and that appropriate BMPs will be employed.

(If there are any existing regulated activities, including underground storage tanks, within the APA, they should be registered with the Department.) The registration form can be found on-line at:

[http://www.ct.gov/dep/lib/dep/Permits\\_and\\_Licenses/Land\\_Use\\_Permits/Aquifer\\_Protection\\_Permits/AquiferProtection\\_reginst.pdf](http://www.ct.gov/dep/lib/dep/Permits_and_Licenses/Land_Use_Permits/Aquifer_Protection_Permits/AquiferProtection_reginst.pdf)

The previous EIE for Master Plan Improvements at the Westside Campus in 2000 depicted approximate locations of wetlands based on delineations that were not located by survey measurements. The O'Neill Center expansion, both parking garages and the Alumni Pavilion appear to be located near the previously provided mapping. The Natural Resources Conservation Service's Soil Survey of Fairfield County depicts bands of Ridgebury, Leicester & Whitman extremely stony soils extending closer to these proposed building sites, although the scale of these soil survey maps do not allow for site-specific accuracy. Existing wetlands and watercourses at the site should be delineated by a certified soil scientist and their functional values should be evaluated. Any development should be sited to avoid regulated areas. Unavoidable impacts should be mitigated and buffer areas established to further protect wetlands and watercourses. The Inland Water Resources Division (IWRD) has a goal of maintaining 100' buffers around wetlands and watercourses. The extent of wetland buffer to be provided should be included in the CEPA document.

In order to protect wetlands and watercourses on and adjacent to the site, strict erosion and sediment controls should be employed during construction. The *Connecticut Guidelines for Soil Erosion and Sediment Control* prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines, published as DEP Bulletin 34 may be obtained at the DEP bookstore, either by telephone (860) 424-3555 or online at:

[http://www.ct.gov/dep/cwp/view.asp?a=2688&q=322396&depNav\\_GID=1511](http://www.ct.gov/dep/cwp/view.asp?a=2688&q=322396&depNav_GID=1511).

Neither of the campuses are within 100-year or 500-year flood zones on the community's Flood Insurance Rate Map. The Department is aware that stormwater management plans are being prepared for flood management certification for the various campuses in the State University System. The plans would evaluate the existing and proposed impervious surface for the entire campus and each subwatershed and propose detention, as appropriate. The plans would be reviewed and approved by the IWRD, so that subsequent review of flood management certification for individual projects would be expedited, provided the project was consistent with the plan. IWRD recently submitted guidance to the Department of Public Works concerning these plans. The plans should include these Master Plan projects.

The stormwater management plans for the campuses must consider both quantity and quality of runoff to mitigate potential impacts. A stormwater collection and treatment system designed for the entire campus, rather than being handled piecemeal during development of each project, will optimize the use of detention and treatment measures. The stormwater management plans should be described, at least on a conceptual level, in the EIE.

The Still River downstream of Lake Kenosia is included on the *2006 List of Connecticut Waterbodies Not Meeting Water Quality Standards*. The impaired designated use is habitat for fish, other aquatic life and wildlife. The cause of the use impairment is unknown; a potential source is unspecified urban stormwater. Given this situation, the stormwater treatment plan for master plan projects will be important in helping to address this problem.

In order to reduce the impact of development and address stormwater quality issues, the Department strongly encourages the use of Low Impact Development (LID) measures. LID site

planning principles involve controlling stormwater/snowmelt runoff volume at the source and hydrologically functional landscaping. Key strategies for effective LID include: conserving and restoring vegetation and soils, designing the site to minimize impervious surfaces, managing stormwater close to where the rain/snow falls, and providing for maintenance and education. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs and parking lots),
- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- proper treatment of special activity areas (e.g. loading docks, covered maintenance and service areas),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and
- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

For additional guidance, consult the *Connecticut Stormwater Quality Manual*. The manual provides guidance on the measures necessary to protect the waters of the state from the adverse impacts of post-construction stormwater runoff. The manual is available on-line at: [http://www.ct.gov/dep/cwp/view.asp?a=2721&q=325704&depNav\\_GID=1654](http://www.ct.gov/dep/cwp/view.asp?a=2721&q=325704&depNav_GID=1654).

The document should quantify the proposed water usage and wastewater flows from full build out of the master plan projects. The ability of Danbury Water Department to provide supply and the availability of capacity at the Danbury water pollution control facility to treat flows should be confirmed.

The document should identify any proposed wastewater discharges that are other than typical domestic wastewater, such as those from chemistry laboratories or photographic processing. Floor drains in facilities such as laboratories and workshops are discouraged. If a floor drain is necessary, appropriate treatment controls should be installed prior to any discharge to the sewer system. The discharge of floor drain wastewater to surface water or to the ground (dry well) is not allowed. If hookup to a sewer system is not feasible, discharge to a holding tank would be required. For further information concerning appropriate controls and potential permit requirements, contact the Bureau of Water Management at (860) 424-3018.

State agencies are collaborating to reduce greenhouse gas emissions in Connecticut. A *Connecticut Climate Change Action Plan 2005* has been developed that will help the State meet the goals and targets established in the *New England Governors/Eastern Canadian Premiers Climate Change Action Plan*. One of the Recommended Actions of the State's Plan, which has been codified in section 22a-200a of the CGS, is the Green Campus Initiative that encourages climate change actions on college and university campuses since these institutions are often

fertile grounds for progressive environmental values and leadership. Several of Connecticut's colleges and universities, including the Connecticut State University System, have already commenced actions to address climate change. The Department urges the University to continue its commitment and that techniques for reducing greenhouse gas emissions be employed in the design and implementation of the projects proposed in the Master Plan. Additional information can also be found at: <http://www.ctclimatechange.com/colleges.html>

Pursuant to section 16a-38k of the CGS, any new construction of a state facility that is projected to cost five million dollars or more, or renovation of a state facility that is projected to cost two million dollars or more must comply with or exceed compliance with the silver building rating of the Leadership in Energy and Environmental Design's (LEED®) rating system for new commercial construction and major renovation projects, as established by the United States Green Building Council, or an equivalent standard, such as a two-globe rating in the Green Globes USA design program. This requirement will be superseded when regulations for state building construction and energy standards being developed by the Office of Policy and Management, in consultation with the Departments of Public Works, Environmental Protection and Public Safety, are adopted. For further information regarding green buildings and LEED® certification, contact Kim Trella of the Office of Planning & Program Development at (860) 424-3234. Additional information can also be found at: <http://www.usgbc.org>.

The Natural Diversity Data Base, maintained by DEP, contains no records of extant populations of Federally listed endangered or threatened species or species listed by the State, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern at the proposed project sites. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultation with the Natural Diversity Data Base should not be substituted for on-site surveys required for environmental assessments. The extent of investigation by competent biologist(s) of the flora and fauna found at the site would depend on the nature of the existing habitat(s). If field investigations reveal any Federal or State listed species, please contact the DEP Geologic & Natural History Survey at (860) 424-3540.

For traffic and air impact analyses, the Department typically recommends that the EPA guidelines for intersection analysis be followed to determine if the carbon monoxide concentrations at the critical intersections will exceed the NAAQS. The following documents should be consulted to determine whether modeling is appropriate:

- EPA-454/R-92-005 - "Guideline for Modeling Carbon Monoxide From Roadway Intersections" See: <http://www.epa.gov/scram001/guidance/guide/coguide.pdf>.
- EPA-454/R-92-006 - "User's Guide to CAL3QHC Version 2.0: A Modeling Methodology for Predicting Pollution Concentrations Near Roadway Intersections" See the following link for the User's Guide, the executable version of the CAL3QHC model & a model change bulletin: [http://www.epa.gov/scram001/dispersion\\_prefrec.htm](http://www.epa.gov/scram001/dispersion_prefrec.htm).

In order to reduce the impact to air quality from mobile source emissions, the Department typically encourages developers to provide accommodations for alternative modes of transportation, such as mass transit and bicycles. To accommodate bicyclists, the proposed

development should include bike storage facilities, bike paths (that may connect to a larger network) or wide shoulders on roadways for added bicycle safety.

In order to mitigate construction impacts, Department typically recommends that, to reduce diesel exhaust emissions, contract specifications should incorporate the use of on-road and construction vehicles and equipment that either have retrofit emission control devices or are equipped with original manufacturers' equipment that meets the most recent federal standards as well as use of ultralow sulfur diesel fuel. Retrofit devices such as diesel oxidation catalysts or diesel particulate filters are options for many vehicles and equipment typically used in construction projects. The on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. For large construction projects, it would be appropriate that contract specifications contain DPW's diesel vehicle emissions control language requiring certain non-road construction equipment to be retrofitted with emission control devices.

Additionally, Section 22a-174-18(b)(3)(C) of the RCSA limits the idling of mobile sources to 3 minutes. This regulation includes on-road 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 construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.

In developing landscaping plans for these projects, the Department recommends that only native species or non-invasive ornamental species be used. A list of *Non-Native Invasive and Potentially Invasive Vascular Plants in Connecticut* has been developed by the University of Connecticut, Center for Conservation and Biodiversity. Invasive plants are non-native or exotic plants that were introduced by human activity and quickly established. Many non-native plants are well known agricultural or horticultural species. Most of these do not escape cultivation or have minimal impacts on natural communities if they do spread. Invasive species rapidly disperse and establish, displacing native plants and altering ecological processes like fire occurrence and nutrient cycling. Due to their rapid growth, efficient means of seed dispersal, and tolerance of a wide range of environmental conditions, invasive plants outcompete with native species for sunlight, nutrients, and space. Species on this list should not be utilized in landscaping. Additional information regarding invasive species or copies of the list may be obtained online at <http://www.hort.uconn.edu/cipwg> or by contacting the Environmental & Geographic Information Center at (860) 424-3540.

The proposed projects must comply with Connecticut's Noise Regulations contained in section 22a-69-1 through 22a-69-7.4 of the RCSA as well as with any local noise regulations. The Department recommends that potential sources of noise, such as HVAC equipment, be sited away from sensitive receptors and that appropriate shielding be provided.

The following standard comments regarding demolition and redevelopment projects should be observed, as applicable, during future planning and implementation of the master plan. Fact

sheets providing additional information concerning environmental, health and safety requirements applicable to building renovation and demolition projects have been developed by the Waste Engineering & Enforcement Division. To obtain copies, call the division at (860) 424-3023. This information is also available on-line at:

[http://www.ct.gov/dep/cwp/view.asp?a=2718&q=325410&depNav\\_GID=1646](http://www.ct.gov/dep/cwp/view.asp?a=2718&q=325410&depNav_GID=1646).

Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, that is not hazardous waste, is considered to be special waste. The disposal of special wastes, as defined in section 22a-209-1 of the RCSA, requires written authorization from the Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. In addition, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at:

[http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324202&depNav\\_GID=1646](http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324202&depNav_GID=1646).

Prior to the demolition of any commercial, industrial or public buildings or buildings containing five or more residential units, they must be inspected for asbestos-containing materials and any such materials must be removed. Written notice must be submitted to the Department of Public Health 10 working days prior to demolition in accordance with Section 19a-332a-3 of the Regulations of Connecticut State Agencies, for buildings involving more than 10 linear feet or more than 25 square feet of asbestos-containing material. For further information, contact DPH at (860) 509-7367. Additional information and notification forms may be downloaded at:

[http://www.ct.gov/dph/cwp/view.asp?a=3140&q=387400&dphNav\\_GID=1828&dphPNavCtr=#47059](http://www.ct.gov/dph/cwp/view.asp?a=3140&q=387400&dphNav_GID=1828&dphPNavCtr=#47059).

The disposal of material containing asbestos requires the approval of the Waste Engineering and Enforcement Division pursuant to section 22a-209-8(i) of the Regulations of Connecticut State Agencies. Proper disposal technique requires that the material be bagged and labeled and placed in an approved secure landfill. For further information, contact the division at (860) 424-3366. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at:

[http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324202&depNav\\_GID=1646](http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324202&depNav_GID=1646).

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g. contaminated with oil or lead

paint), tree stumps, or any kind of contaminated soils. Landclearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the Connecticut General Statutes and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at:

<http://www.ct.gov/dep/cwp/view.asp?A=2718&Q=325398>.

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible to minimize the need to dispose of it in landfills. It is recommended that contracts be drafted to reflect this goal and that they be awarded only to those companies who present a sufficiently detailed plan for reuse/recycling to demonstrate that they can comply with this requirement.

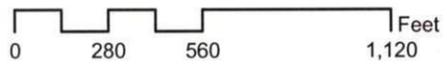
In order to expedite the Department's review of the Environmental Impact Evaluation, please forward three copies of the document to this office when it becomes available for public review. We will distribute it to appropriate offices and prepare coordinated Departmental comments. Thank you for the opportunity to review this project. If there are any questions regarding these comments, please contact me.

cc: Jeff Bolton, DPW  
Jeff Caiola, DEP/IWRD  
Robert Gilmore, DEP/IWRD  
Robert Hannon, DEP/OPPD  
Rob Hust, DEP/WPSD  
Robert Kaliszewski, DEP/OPPD  
Chris Malik, DEP/WPSD  
Jessica Morgan, DEP/WPSD  
Steve Tessitore, DEP/IWRD  
Kim Trella, DEP/OPPD

# Aquifer Protection Area

## Legend

- Final, Adopted
- Final, Not Adopted
- Preliminary



The agency expects to release the EIE for this project, for public review and comment, in the **fall of 2009**.

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**NO EFFECT**

*David Calhoun* DEPUTY SHPO

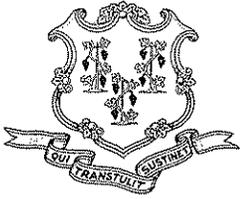
STATE HISTORIC PRESERVATION OFFICE

Date 1.5.10 Project WCSU  
Master Plan

RECEIVED

JAN 07 2010

CAPITAL PROJECTS



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

June 2, 2009

Mr. Keith Epstein, AIA  
Assistant Vice Chancellor for Planning and Technical Services  
Connecticut State University System  
39 Woodland Street  
Hartford, CT 06105

RE: Notice of Scoping for the Engineering Study for the 2007 Comprehensive Campus  
Master Plan for Western Connecticut State University

Dear Mr. Epstein:

The Department of Public Health Drinking Water Section's Source Water Protection Unit has reviewed the above scoping notice. Please refer to the attached report for our comments particularly regarding the concern over Danbury Water Department's current available water and margin of safety.

If you have any questions regarding these comments, please call Pat Bisacky of this office at (860) 509-7333.

Sincerely,

A handwritten signature in cursive script that reads "Lori Mathieu".

Lori Mathieu  
Public Health Services Manger  
Drinking Water Section

Enc.

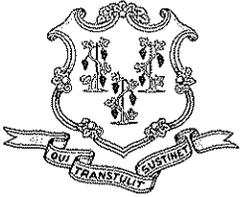
Cc w/enc: David Day, Danbury Public Utilities Superintendent  
Antonio Iadarola, P.E., Danbury Public Works Director



Phone:

(860) 509-7333  
Telephone Device for the Deaf: (860) 509-7191  
410 Capitol Avenue - MS # 51WAT  
P.O. Box 340308 Hartford, CT 06134

*Affirmative Action / An Equal Opportunity Employer*



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

### MEMORANDUM

From: Patricia Bisacky, Environmental Analyst 2 *PB*  
Source Water Protection Unit  
Drinking Water Section

Subject: Notice of Scoping for the 2007 Comprehensive Campus Master Plan for  
Western Connecticut State University

DPH #: 2009-0276

Date: June 2, 2009

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The Department of Public Health Drinking Water Section (DWS) has reviewed the scoping notice regarding the 2007 Comprehensive Campus Master Plan for Western Connecticut State University and offers the following comments:

Several new and renovated buildings in the West Side Campus proposed development are located within the Preliminary Level B Aquifer Protection Area of the Lake Kenosia Wellfield and the public water supply watershed of the Lake Kenosia Diversion, both sources of drinking water for the Danbury Water Department. Any construction proposed for these areas must adhere to best management practices for construction within a public drinking water supply watershed or aquifer protection area. These practices include, but are not limited to:

- **Construction and Maintenance:** No construction should take place until erosion and sedimentation controls are installed. These controls should be installed, properly functioning, inspected regularly, and remain in place throughout the project. All activities should be conducted during dry weather conditions. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly maintained. No herbicides or pesticides should be used in any seed mix.
- **Emergency Response Plan:** Develop an Emergency Spill Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.
- **Hazardous Materials Storage:** Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.
- **Vehicles and Machinery:** A specific area of the project site should be designated for auto parking, vehicle refueling and routine equipment maintenance. Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment fueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment

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and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.

- **Stormwater Management System Operation and Maintenance:** An operation and maintenance manual for the stormwater management system should be developed. This manual should detail procedures and responsible parties for inspection, assessment and maintenance of the stormwater collection and treatment system.
- **Notification:** Notification of the project start date should be sent to the Danbury Water Department as soon as it has been determined. The Drinking Water Section staff and Danbury Water Department staff should be granted site access to review for compliance with construction site best management practices. The Drinking Water Section must be notified immediately of any chemical/fuel spill at the construction site, along with the Department of Environmental Protection's Oil and Chemical Spill Response Unit. Emergency telephone numbers and a statement identifying the construction site as a sensitive public water supply area should be posted where they are readily visible to contractors and other on-site personnel. A note should be added to the site plans stating the sensitivity of the area.
- **When Danbury Water Department has completed the final Level A Aquifer Protection Area mapping for the Lake Kenosia Wellfield, certain activities, such as power generation will be regulated.** Since Level A Aquifer Protection Area mapping may be completed prior to construction of this project, all attempts should be made to ensure that regulated activities are located outside of the Aquifer Protection Area. More information on regulated activities within Aquifer Protection Areas may be found at the following internet site:  
[http://www.ct.gov/dep/lib/dep/aquifer\\_protection/tablereglanduses.pdf](http://www.ct.gov/dep/lib/dep/aquifer_protection/tablereglanduses.pdf) .

Both the Westside and Midtown Campus current and proposed developments are served by Danbury Water Department's public water supply system. Danbury Water Department's Individual Water Supply Plan Update is currently under ongoing review by the DWS. A number of concerns exist regarding Danbury Water Department's current and future available water supply and margin of safety.

- **Based upon Danbury's Individual Water Supply Plan, Danbury projects the need to develop additional sources of water to meet projected future demand.** Danbury Water Department needs to address its projected water supply deficit issues through the water supply planning process prior to committing water service to new customers.
- **Demand for public drinking water for this project should be carefully evaluated.** All new construction and renovations should be equipped with ultra-low flow fixtures. The US Environmental Protection Agency's partnership program, Water Sense, is a useful resource for locating water efficient products. It may be accessed at the following link:  
<http://www.epa.gov/watersense/> . All attempts should be made to ensure that no net increase in demand for public water supplied by the Danbury Water Department would be required prior to determining that it has adequate supply to meet the increased demand.

**ATTACHMENT C**

EIE Public Review Period Notice and Advertisements

Posted January 1, 2011

## **EIE Notices**

**The following Environmental Impact Evaluation (EIE) notice has been submitted for review and comment in this edition.**

### **1. EIE Notice for the 2007 Comprehensive Campus Master Plan for Western Connecticut State University (WCSU)**

**Municipality where project is proposed:** Danbury

**Address of Possible Project Locations:** Westside Campus (Lake Avenue), and Midtown Campus (181 White Street)

**Project Description:** The Board of Trustees for the Connecticut State University System (CSUS) proposes to implement a program of improvements to the Midtown and Westside Campuses at Western Connecticut State University (WCSU) (the "Preferred Plans"). These improvements have been released as part of the approved *2007 Comprehensive Campus Master Plan for Western Connecticut State University*, prepared by Symmes Maini & McKee Associates, Inc. in September 2007. The primary goals and objectives of the improvement program are to:

- Renovate, upgrade, replace, and expand existing facilities;
- Relocate functions in existing or new facilities in coordination with the WCSU's space utilization study;
- Unify and consolidate core uses of the campus;
- Utilize existing resources, building on existing strengths, and reinforcing the positive image of the University, community, and State; and
- Provide a development strategy that establishes need, priority, schedule, and cost effective solutions to the University's and existing and future needs.

The Campus Plan would be implemented through various projects on campus providing new or renovated academic, administrative, athletic and residential space, new parking garages, landscaping, new quadrangles, linkage of exterior spaces throughout the campus, and demolition of some existing structures.

The Westside Campus project improvements would likely include the following (with approximate gross square feet noted):

- New Visual and Performing Arts Center with 170,000 gross square feet (gsf) of floor space;
- Three residence halls, each with floor space measuring 60,000 gsf and with a total capacity of 394 residents;
- Addition to the Classroom Building of 51,000 gsf;
- Addition to the O'Neill Center of 25,000 gsf;
- Two parking garages (one with an associated mini-power plant), each with a capacity for 500 cars;
- Closing of a portion of University Boulevard and redirection of vehicular and pedestrian flow.

The Midtown Campus project improvements would likely include the following:

- New Wellness Center (attached to Berkshire Hall), with 39,000 gsf of floor space;
- Addition to the Student Center of 33,000 gsf;
- One new residence hall, with floor space measuring 138,000 gross square feet (gsf) and a capacity of 300 residents;
- One new parking garage (and associated chiller plant) with a capacity for 400 cars;

Posted January 1, 2011

- Demolition of the Roberts Avenue Elementary School and closing of the associated street.
- Demolition of the Richa House and associated garage.

To implement these improvements, the 2015 Campus Master Plan Update is being proposed as part of this EIE. Below are the preferred conceptual plans for each campus.

**Project Map(s):** Click below to view project figures.

[Project Vicinity Map](#) (1.4 MB)

**Westside Campus:**

[Existing Conditions](#) (238 kb)

[Preferred Alternative](#) (254 kb)

**Midtown Campus:**

[Existing Conditions](#) (327 kb)

[Preferred Alternative](#) (338 kb)

**Comments on this EIE will be accepted until the close of business on: **March 4, 2011.****

**The public can view a copy of this EIE at:** <http://www.ct.gov/dpw>; WCSU Haas Campus Library, 181 White Street, Danbury; City of Danbury City Clerk's Office, 155 Deer Hill Road, Danbury; Danbury Public Library, 170 Main Street, Danbury; CSUS Offices, 39 Woodland Street, Hartford; and CT DPW, 165 Capitol Avenue, Room 275, Hartford.

**There is no public hearing scheduled for this EIE. The agency will hold a public hearing if 25 or more persons or an association that has at least 25 members requests a hearing. A public hearing request must be made no later than **January 28, 2011 by 5:00 pm.****

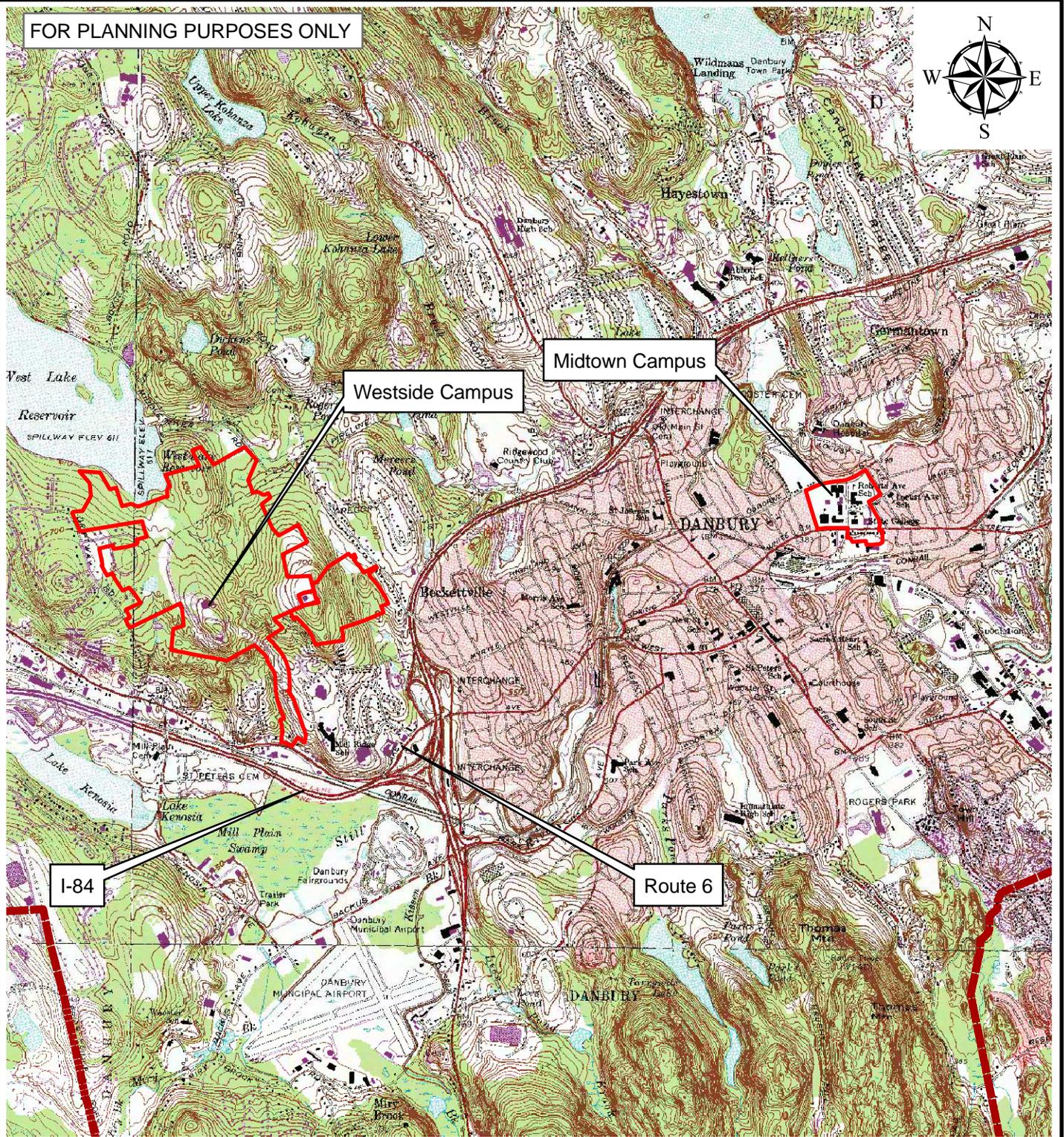
**Send your comments about this EIE to:**

**Name:** Keith Epstein, AIA  
**Title:** Assistant Vice Chancellor for Planning and Technical Services  
**Agency:** Connecticut State University System  
**Address:** 39 Woodland Street  
Hartford, Connecticut 06105  
**Fax:** 860-493-0059  
**E-Mail:** [epsteink@ct.edu](mailto:epsteink@ct.edu)

**If you have questions about a public hearing, or where you can review this EIE, or similar matters, please contact:**

**Name:** Jeff Bolton, Supervising Environmental Analyst  
**Agency:** Connecticut Department of Public Works  
**Address:** 165 Capitol Avenue, Room 275  
Hartford, Connecticut 06106  
**Phone:** 860-713-5706  
**E-Mail:** [jeffrey.bolton@ct.gov](mailto:jeffrey.bolton@ct.gov)

FOR PLANNING PURPOSES ONLY



3,000 1,500 0 3,000 Feet

**LOCUS**

Project No:  
15.0166140.10

**LEGEND**

-  Campus Property Boundaries
-  Town Boundaries

**Western Connecticut State University  
Danbury, Connecticut**

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

CT SEAMLESS TOPO MAPS 1997, USGS TOPOGRAPHIC  
QUADRANGLE MAPS Danbury, Brewster, Bethel, Peach Lake

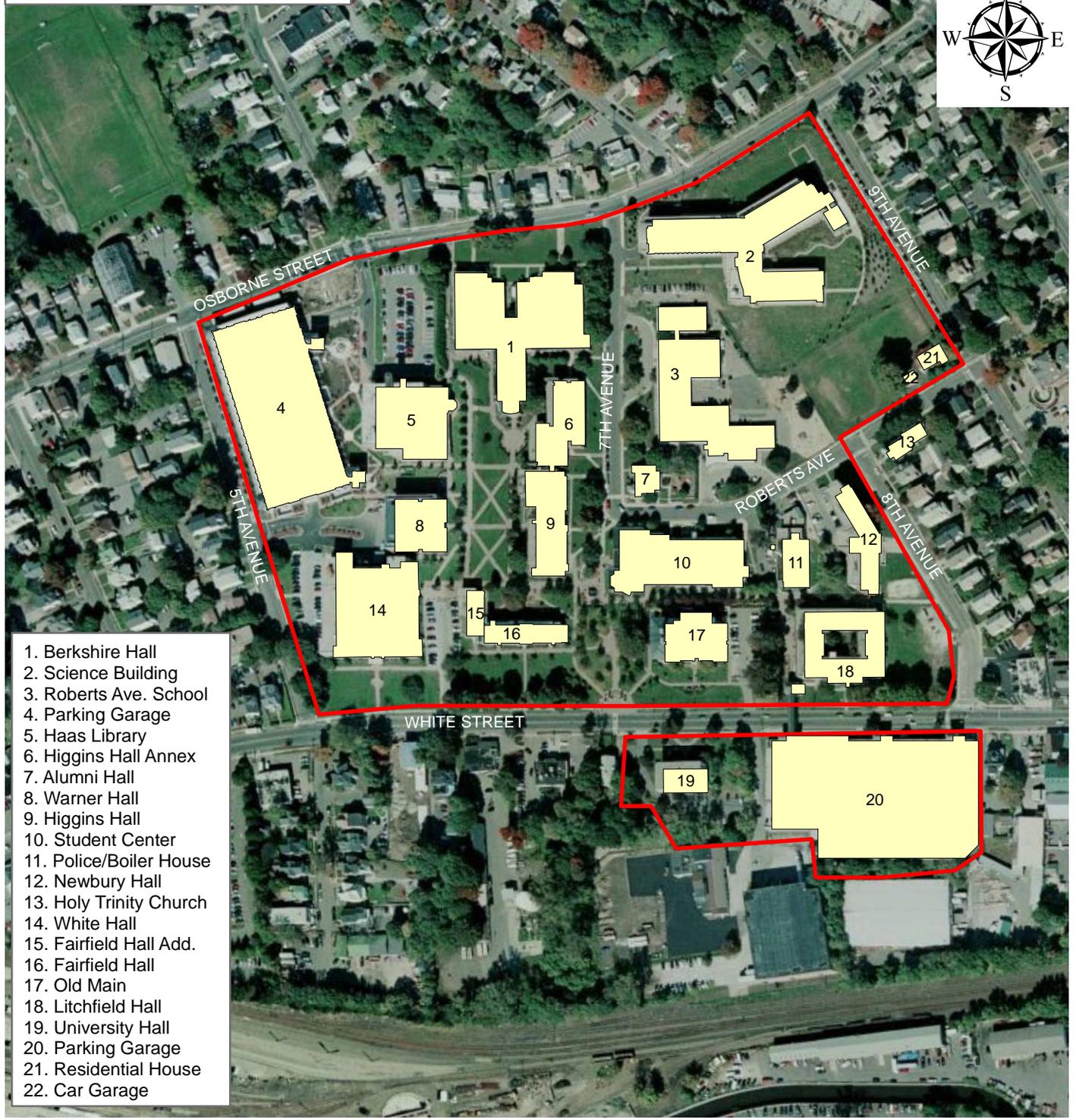
Figure No:

 Baystate Environmental Consultants, Inc.  
East Longmeadow, MA / Bloomfield, CT

Data obtained from University of Connecticut Map and Geographic  
Information Center and CT Department of Environmental Protection

**1-1**

FOR PLANNING PURPOSES ONLY



1. Berkshire Hall
2. Science Building
3. Roberts Ave. School
4. Parking Garage
5. Haas Library
6. Higgins Hall Annex
7. Alumni Hall
8. Warner Hall
9. Higgins Hall
10. Student Center
11. Police/Boiler House
12. Newbury Hall
13. Holy Trinity Church
14. White Hall
15. Fairfield Hall Add.
16. Fairfield Hall
17. Old Main
18. Litchfield Hall
19. University Hall
20. Parking Garage
21. Residential House
22. Car Garage



**LEGEND**

- Existing Buildings
- Property Boundary

**EXISTING CONDITIONS**

**Western Connecticut State University  
Midtown Campus  
Danbury, Connecticut**

Project No:  
**15.0166140.10**

Drawn by:  
**ATR**

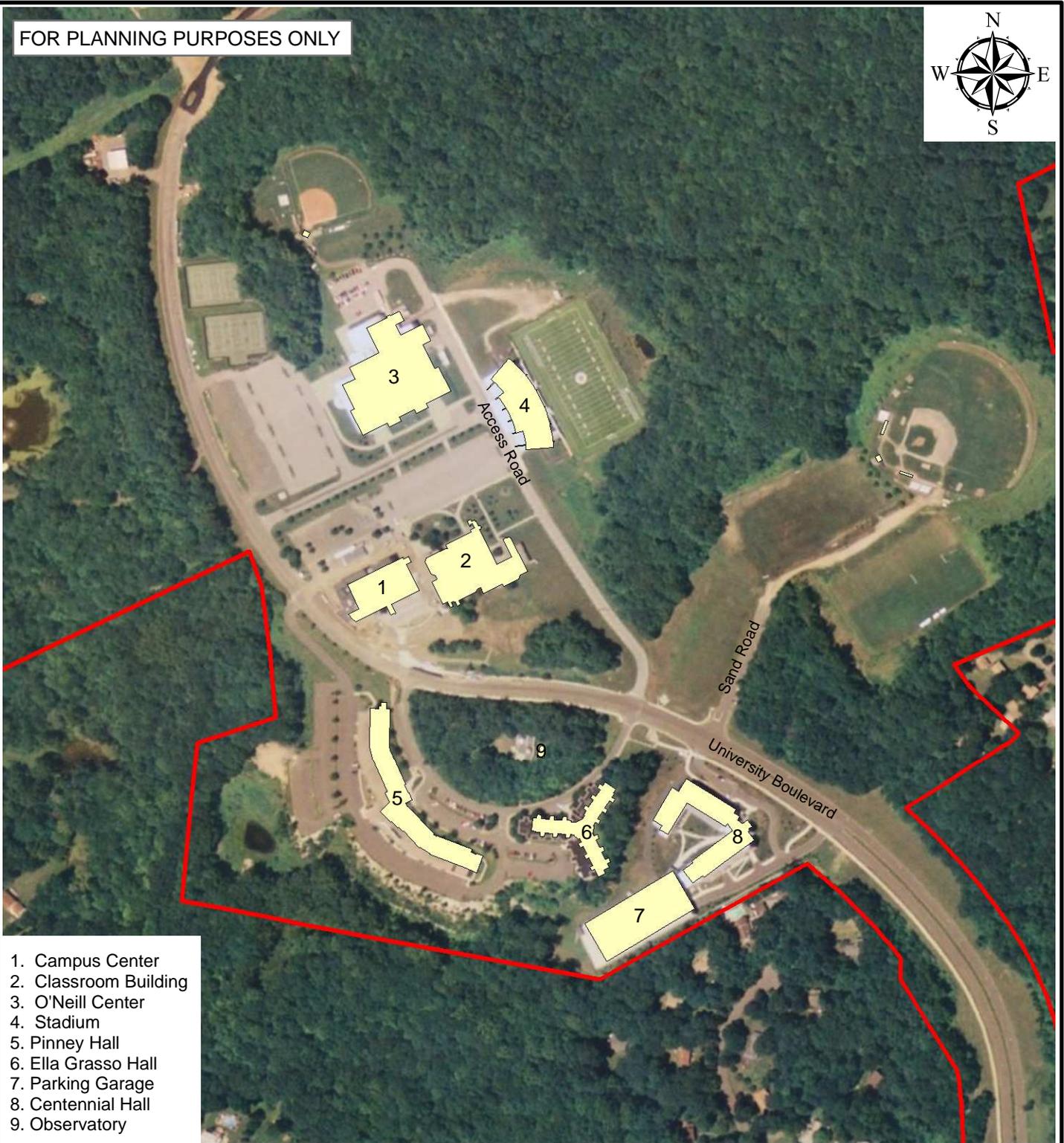
Checked by:  
**JRB**

Date:  
**AUGUST 2010**

Figure No:

**1-2**

FOR PLANNING PURPOSES ONLY



- 1. Campus Center
- 2. Classroom Building
- 3. O'Neill Center
- 4. Stadium
- 5. Pinney Hall
- 6. Ella Grasso Hall
- 7. Parking Garage
- 8. Centennial Hall
- 9. Observatory



### EXISTING CONDITIONS

Project No:  
15.0166140.10

### LEGEND

-  Existing Buildings
-  Property Boundary

**Western Connecticut State University  
Westside Campus  
Danbury, Connecticut**

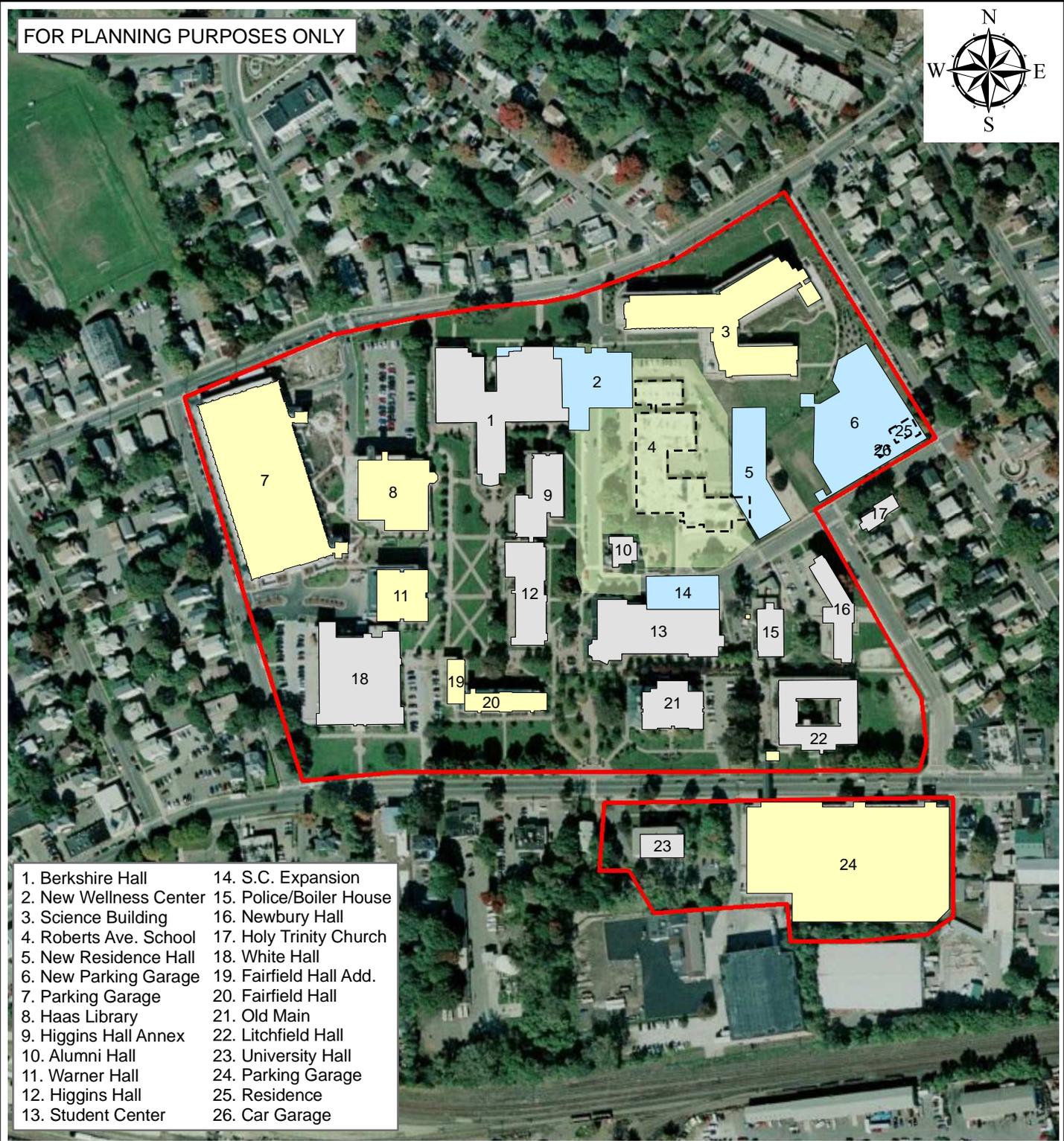
Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

Figure No:

FOR PLANNING PURPOSES ONLY



- |                        |                         |
|------------------------|-------------------------|
| 1. Berkshire Hall      | 14. S.C. Expansion      |
| 2. New Wellness Center | 15. Police/Boiler House |
| 3. Science Building    | 16. Newbury Hall        |
| 4. Roberts Ave. School | 17. Holy Trinity Church |
| 5. New Residence Hall  | 18. White Hall          |
| 6. New Parking Garage  | 19. Fairfield Hall Add. |
| 7. Parking Garage      | 20. Fairfield Hall      |
| 8. Haas Library        | 21. Old Main            |
| 9. Higgins Hall Annex  | 22. Litchfield Hall     |
| 10. Alumni Hall        | 23. University Hall     |
| 11. Warner Hall        | 24. Parking Garage      |
| 12. Higgins Hall       | 25. Residence           |
| 13. Student Center     | 26. Car Garage          |



**PREFERRED ALTERNATIVE**

Project No:  
15.0166140.10

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

Exhibit

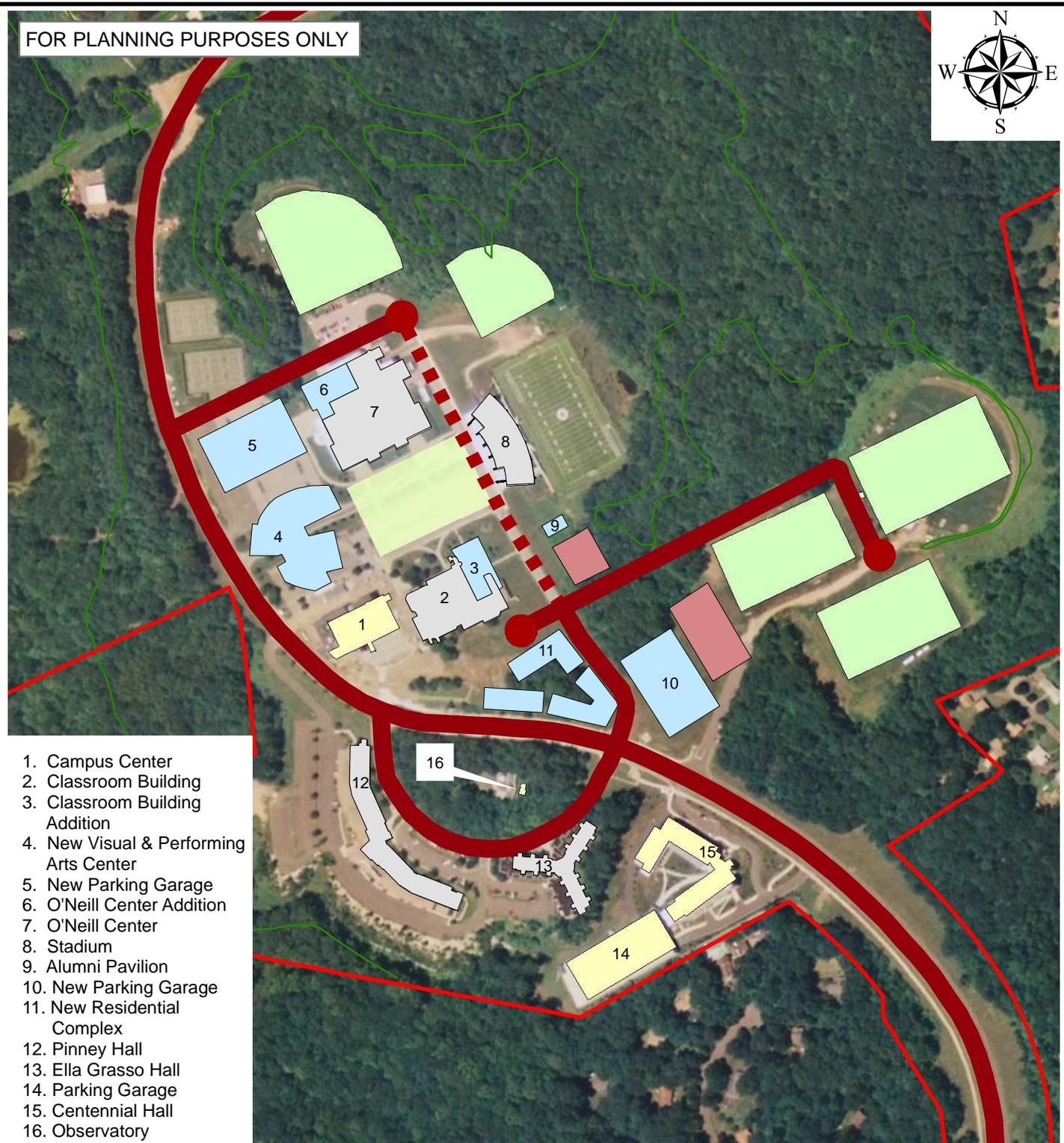
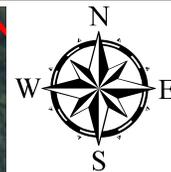
**LEGEND**

- Existing Buildings
- Proposed Demolition
- Proposed Renovation
- Proposed Buildings
- Proposed Campus Quadrangle

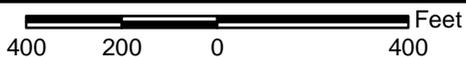
**Western Connecticut State University  
Midtown Campus  
Danbury, Connecticut**

BASE MAP: Microsoft Virtual Earth Aerial Photo

FOR PLANNING PURPOSES ONLY



1. Campus Center
2. Classroom Building
3. Classroom Building Addition
4. New Visual & Performing Arts Center
5. New Parking Garage
6. O'Neill Center Addition
7. O'Neill Center
8. Stadium
9. Alumni Pavilion
10. New Parking Garage
11. New Residential Complex
12. Pinney Hall
13. Ella Grasso Hall
14. Parking Garage
15. Centennial Hall
16. Observatory



**PREFERRED ALTERNATIVE - WESTSIDE**

Project No:  
15.0166140.10

**LEGEND**

- Primary Vehicular Route
- Secondary Vehicular Route
- Wetland- Estimated by BEC
- Proposed Surface Parking
- Proposed Renovated Buildings
- Proposed Buildings
- Existing Buildings
- Proposed Athletic Fields
- Proposed Quadrangle
- Property Boundary

**Western Connecticut State University  
Westside Campus  
Danbury, Connecticut**

Drawn by:  
ATR

Checked by:  
JRB

Date:  
AUGUST 2010

Figure No:

**ATTACHMENT D**

Environmental Impact Evaluation Comments and Responses



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

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**To:** Keith Epstein, AIA - Assistant Vice Chancellor for Planning & Technical Services  
Connecticut State University System, 39 Woodland Street, Hartford

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

**Date:** March 4, 2011      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** Western Connecticut State University, Danbury

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The Department of Environmental Protection has reviewed the Environmental Impact Evaluation (EIE) for various Master Plan projects at both the Midtown and Westside Campuses at Western Connecticut State University. The following commentary is submitted for your consideration.

According to the EIE, the estimated direct impact to inland wetlands resulting from implementation of the Master Plan improvements at the Westside Campus range from 1300 to 9800 sq.ft. As noted on page 37, the latter figure would require a Category II permit from the U.S. Army Corps of Engineers (ACOE). Although not noted in the text, the smaller number, resulting from various measures to minimize impact, may qualify for a Category I ACOE, non-reporting permit as it is less than 5000 sq.ft. In order to make a definitive determination as to Category 1 eligibility for Section 404 and Section 401 permitting under the *Department of the Army, Programmatic General Permit, State of Connecticut*, documentation of wetland impacts, including an accounting of any previous direct and secondary wetland impacts, should be submitted to the Army COE as part of a single and complete project review. In accordance with *Programmatic General Permit Conditions, General Requirements 5, Single And Complete Projects*, the sum of previous and proposed direct and secondary wetland impacts would have to be less than 5000 square feet in order to be potentially eligible for Category 1 authorization. Previous direct and secondary wetland impacts that were permitted or should have been subject to permitting under the Federal Clean Water Act (Section 404 and Section 401) within the bounds of the Westside Campus need to be identified. After reviewing that information, the ACOE would be able to determine the appropriate path for Section 404 and Section 401 permitting: either Category 1 or application for Category 2 under the Programmatic General Permit.

Stormwater from the campuses ultimately drains to the Still River. The Still River is on the Department's Impaired Waters List in the *2008 State of Connecticut Integrated Water Quality Report* for the following impaired designated uses: (1) Habitat for Fish, Other Aquatic Life and Wildlife; cause - unknown; potential sources include unspecified urban stormwater; and (2) Recreation; cause - bacteria; potential sources include unspecified urban stormwater (and other unknown sources). (See Table 3-3 in the report, on-line at: [Water Quality Report](#))

The Department has developed a draft *Total Maximum Daily Load (TMDL) for the Still River Regional Basin for Recreational Uses*, which is in the process of being adopted. (Online at: [Still River TMDL](#)) This TMDL looks to reduce existing sources of bacteria from both point and nonpoint sources by implementing control actions where technically and economically feasible.

In addition to bacteria issues, the Still River has also been identified as contributing proportionately high levels of phosphorus to the Housatonic River and downstream impoundments, particularly Lake Lillinonah, which has been experiencing severe eutrophication problems during warm, low flow summer months. A certain portion of this phosphorus loading is associated with the Danbury waste water treatment plant and the Department has been working with the City to find ways to address this issue. However, nonpoint source, stormwater contributions of phosphorus from developed areas are also of concern.

The treatment and handling of stormwater on the sites is particularly important in this very urbanized area, as attested by the concerns identified above. The University is proposing to implement measures to control stormwater runoff during and after construction and has drafted Stormwater Master Plans to evaluate existing conditions and potential impacts due to proposed development. The effectiveness in treating bacteria and phosphorus should be major criteria in the selection of stormwater control measures at the campuses.

A portion of the Westside Campus is within the Aquifer Protection Area (APA) on the Final Level A mapping for the Danbury Water Department's Lake Kenosia wellfield. The proposed Visual & Performing Arts Center, the parking garage west of the O'Neill Center and the westernmost portion of one of the residential halls are within the APA. Based on the project descriptions in the EIE, no new regulated activity, as defined by section 22a-354i-1(34) of the Regulations of Connecticut State Agencies (RCSA), is proposed within the APA.

Page 41 states that "The DEP made a comment in a response to the WCSU Master Plan scoping letter that that the generation of electricity using fossil fuels other than natural gas or propane should not be allowed at the new parking garage on the Westside Campus (DEP, 2009). This statement is presumed to exclude emergency power sources." Section 22a-354i-1(34)(k) of the RCSA provides for the exceptions for generation of electrical power by an emergency engine as defined by section 22a-174-22(a)(3) of the RCSA or the generation of electrical power by means of natural gas or propane.

In our scoping comments, the Department stated that "The document should quantify the proposed water usage and wastewater flows from full build out of the master plan projects. The ability of Danbury Water Department to provide supply and the availability of capacity at the Danbury water pollution control facility to treat flows should be confirmed." The EIE does not estimate future water usage or wastewater flows for full build out of the campuses, although it does state that it is expected to increase nominally by approximately 2000 gallons per student. Page ES-2 notes that WCSU intends to grow by 27% in enrollment by 2015. Given that the new facilities will tend to be water efficient due to LEAN standards, the ability of utilities to meet increased demand should not be major issue. Nevertheless, in the interest of compiling a thorough evaluation, this should be confirmed.

Page 73 states that construction equipment with diesel oxidation catalysts or particulate filters, and “clean” fuels, will be used to the maximum extent possible. It should be noted that the use of newer equipment that meets EPA standards would obviate the need for retrofits. The Department recommends that provisions to either utilize new equipment or require retrofits to reduce diesel emissions be included in the construction contracts for the various master plan projects.

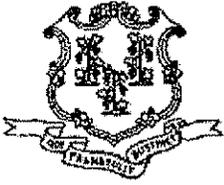
The EIE also notes that impacts will also be minimized by limiting the idling of mobile sources to 3 minutes in accordance with Section 22a-174-18(b)(3)(C) of the RCSA. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.

Master Plan improvements at the Midtown Campus include demolition of Roberts Avenue School and a residence at 30 Ninth Avenue as well as numerous renovation projects. Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State’s reuse and recycling goals. The *State Solid Waste Management Plan* outlines a goal of 58% recovery rate for municipal solid waste by the year 2024. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. It is recommended that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. Additional information concerning construction and demolition material management and waste management plans can be found on-line at: [C&D Material Management](#) and [C&D Waste Management Plans](#).

Two errors in presenting information were noted in review of the EIE. The general maps of the existing stormwater system for the Westside Campus were not included in Appendix B, as noted on page 47. Some portion of the narrative was missing at the top of page 23, which begins midsentence.

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

cc: Jeff Bolton, DPW  
Sherrill Baldwin, DEP/WEED  
Jeff Caiola, DEP/IWRD  
Kim Czapla, DEP/WPSD  
Robert Gilmore, DEP/IWRD  
Robert Hannon, DEP/OPPD  
Susan Peterson, DEP/WPSD  
Ellen Pierce, DEP/APSD



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH  
ENVIRONMENTAL HEALTH SECTION

March 2, 2011

Keith Epstein, Asst. Vice Chancellor for Planning and Technical Services  
Connecticut State University System  
39 Woodland Street  
Hartford, CT 06105-2337

RE: Western Connecticut State University Master Plan Environmental Impact Evaluation

Dear Mr. Epstein:

A review of the documents reveals several buildings that would be either newly constructed or renovated as part of the Master Plan. Projects that include any renovation, remodeling or demolition of existing buildings, or the excavation of soils, requires a plan to address asbestos since these types of construction activities could result in the disturbance of surfaces that may contain asbestos. When a building is to be constructed, it should be built using radon resistant features.

The following summarizes the Department's position with regard to asbestos and radon:

## **A. Asbestos Program:**

The renovation or demolition of an existing facility or structure may impact asbestos-containing materials. In order to ensure compliance with DPH regulations, an asbestos inspection should be conducted prior to the commencement of renovation or demolition activities. A DPH licensed asbestos consultant, with certification as an Inspector or a Management Planner, must be hired to conduct such an inspection. If asbestos is identified that will be impacted by the planned renovation or demolition activity, it must be properly abated. A DPH licensed asbestos contractor must be hired to conduct asbestos abatement that involves more than three (3) linear feet or more than three (3) square feet of asbestos-containing material. Additionally, the DPH must be provided with notification prior to asbestos abatement that involves greater than ten (10) linear feet or greater than twenty-five (25) square feet of asbestos-containing material. Asbestos abatement must be performed in accordance with all applicable federal, state and local regulations.

Additional inquiries on the subject of asbestos abatement can be directed to Ronald Skomro, Supervising Environmental Analyst of the Asbestos Program at 860-509-7367.



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## **B. Radon**

The Connecticut Department of Public Health Radon Program recommends that during the construction of the building, radon resistant features should be built into the infrastructure of the building.

The list below describes the basic components of radon resistant new construction:

- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building
- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home
- Sealing and caulking all openings in the foundation floor to reduce soil gas entry
- A vent pipe, such as 6 inch PVC pipe, to run from the gas permeable layer through the building to the roof to safely vent soil gases above the building
- An electrical junction box installed in case an electric venting fan is needed later

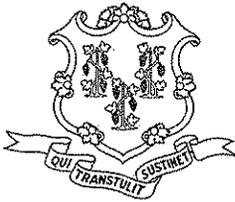
The facility should be tested for radon after construction is completed. If radon results are at or above 4.0 picocuries per liter (pCi/L), the existing system should be activated by installing an in-line fan.

Additional inquiries on the subject of radon resistant new construction can be directed to Francesca Provenzano, Health Program Supervisor of the Radon Program, at 860-509-7367.

Sincerely,



Suzanne Blancaflor, M.S., M.P.H., Chief  
Environmental Health Section



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

March 4, 2011

Mr. Keith Epstein, AIA  
Assistant Vice Chancellor for Planning and Technical Services  
Connecticut State University System  
39 Woodland Street  
Hartford, CT 06105

RE: Notice of EIE for the 2007 Comprehensive Campus Master Plan for Western Connecticut State University

Dear Mr. Epstein:

The Department of Public Health Drinking Water Section's Source Water Protection Unit has reviewed the above notice of EIE. Please refer to the attached report for our comments.

If you have any questions regarding these comments, please call Pat Bisacky of this office at (860) 509-7333.

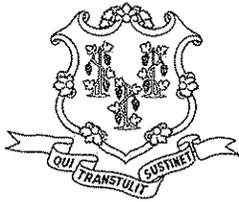
Sincerely,

Eric McPhee  
Supervising Environmental Analyst  
Drinking Water Section

Cc: David Day, Danbury Water Department



Phone: (860) 509-7333  
Telephone Device for the Deaf (860) 509-7191  
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P.O. Box 340308 Hartford, CT 06134  
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# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

### MEMORANDUM

From: Patricia Bisacky, Environmental Analyst <sup>2</sup> *PB*  
Source Water Protection Unit  
Drinking Water Section

Subject: Notice of EIE for the 2007 Comprehensive Campus Master Plan for Western Connecticut State University (WCSU)

Date: March 4, 2011

The Department of Public Health, Drinking Water Section (DWS) has reviewed the notice of EIE for 2007 Comprehensive Campus Master Plan for Western Connecticut State University (WCSU). The proposed project encompasses both of WCSU's campuses, the Midtown campus in downtown Danbury, Connecticut and the Westside campus, about 2¼ miles west of Midtown. The Master Plan proposes a major circulation reorganization, construction of new classroom buildings, residence halls, parking garages, a wellness center and reorganization of athletic facilities.

The western portion of the Westside Campus is within the Level A Aquifer Protection Area of the Kenosia Wellfield and the public water supply watershed of the Lake Kenosia Diversion, both sources of public drinking water for the Danbury Water Department (PWSID# CT0340011) and its customers in City of Danbury. The DWS offers the following observations and comments regarding this EIE:

- A mini power plant is proposed to be constructed within a parking garage which is proposed to be located within the Kenosia Wellfield Level A APA. Danbury has adopted Aquifer Protection Area Regulations which regulate and restrict certain activities within the APA. These regulations should be consulted to ensure that activities associated with the operation of this power plant are in compliance with the regulations.
- Low impact development (LID) measures have been proposed to be utilized for storm water management. Some measures that protect surface water quality and quantity may adversely affect groundwater quality and quantity and vice versa. However, there may be areas within the APA where LID measures intended to protect surface water quality and quantity are appropriate. The Danbury Water Department should be consulted to determine if there are areas on the Westside Campus where infiltration of untreated or minimally treated stormwater may be a concern to the quality of the water in its source water area. LID measures should be planned with the type of public drinking water resource to be protected in mind.
- It is noted that geothermal systems may be installed in association with implementation of the Master Plan. For clarification purposes, please note that the Department of Consumer Protection is the lead agency responsible for developing regulations for geothermal wells in conjunction with the Department of Public Health and the Department of Environmental Protection. While these regulations are under development it is recommended that geothermal systems are constructed in accordance with the document Report to the General Assembly Recommendations for Regulations of Geothermal Wells Revision 2.0 dated March 5, 2007. The Department of Public Health has issued three Circular Letters which offer clarification on certain items within the report. These are Circular Letters 2007-11, 2007-12 and 2008-58. It is recommended that all be consulted when designing and installing geothermal wells. The Report and Circular Letters 2007-11 and 2007-12 may be found on the DPH web site. Click on "Environmental Health" on the DPH Menu on the left hand side of the page, then on the main menu click on "Subsurface Sewage (septic systems)" then "Circular Letters." Circular Letter 2008-58 has been attached to this document.
- The DWS acknowledges that the EIE proposes use of low flow fixtures and other water conservation measures when designing new buildings. The DWS encourages the use of these measures and recommends that water conserving measures also be implemented for landscaping and other outdoor uses.

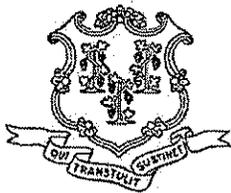


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- The EIE indicates that it is unlikely that soil or groundwater contamination will be encountered during the construction phase of the Westside Campus. It does propose a plan for notification and assessment should these issues be encountered. The Danbury Water Department and the DWS should also be notified if these issues are encountered within the Kenosia Wellfield Level A APA and Lake Kenosia Diversion public supply watershed.

In addition to the above observations and comments, the DWS offers the following general recommendations to protect the sources of public drinking water for the City of Danbury.

- **Construction Maintenance:** No construction should take place before erosion and sedimentation controls are installed. These controls should be installed, properly functioning, inspected regularly and remain in place throughout the project. All activities should be conducted during dry weather conditions. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly maintained. No herbicides or pesticides should be in any seed mix.
- **Emergency Response Plan:** Develop an Emergency Spill Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.
- **Hazardous Materials Storage:** Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.
- **Vehicles and Machinery:** A specific area of the project site outside of the public water supply source water areas should be designated for auto parking, vehicle refueling and routine equipment maintenance. Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment fueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.
- **Sanitation:** Make sure portable toilets are in good working order. Check frequently for leaks.
- **Notification:** Notification of the project start date should be sent to all affected public water systems as soon as it has been determined. A representative of the Danbury Water Department should be granted site access to review compliance with construction site best management practices. The Danbury Water Department and Drinking Water Section must be notified immediately of any chemical/fuel spill at the construction site, along with the Department of Environmental Protection's Oil and Chemical Spill Response Unit. Emergency telephone numbers and a statement identifying the construction site as a sensitive public water supply area should be posted where they are readily visible to contractors and other on-site personnel. A note should be added to the site plans stating the sensitivity of the area.



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL HEALTH SECTION

### EHS Circular Letter #2008-58

Reissuance of Circular Letter #2007-11 with minor changes

Date: July 21, 2008

To: Local Directors of Health and Chief Sanitarians

From:  Suzanne Blancaflor, M.S., Chief, Environmental Health Section

Re: Geothermal Wells

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As many of you are aware Geothermal Heat Exchange Systems are becoming more popular in Connecticut. In 2007 the Department of Public Health (DPH), in consultation with the Departments of Consumer Protection and Environmental Protection, issued a report to the Connecticut General Assembly on such systems. The report made recommendations concerning:

- Construction standards for closed loop geothermal systems
- Grouts used in closed loop geothermal systems
- Heat transfer fluids
- Permits
- Separation distances
- Abandonment procedures
- Licensing of contractors

The Department of Consumer Protection, in consultation with the Departments of Environmental Protection and Public Health, is in the process promulgating regulations for Geothermal Heat Exchange Systems. In the interim, the DPH is issuing this guidance to environmental health professionals, based on the recommendations made in the report.

### OPEN LOOP GEOTHERMAL SYSTEMS

Open loop geothermal systems withdrawal groundwater from the earth, circulate it through a heat exchanger, and discharge it to either a surface water, a sewer, into a separate well, or back into the same well. **The vertical boreholes associated with open loop systems are considered water supply wells and fall under the current regulations for water supply wells.** Environmental professionals should be aware that wells discharging over 5,000 gallons per day require a DEP permit and any well discharging into surface water may require a permit from the local inland wetlands agency. A water company land permit is required pursuant to CGS Section 25-32(b) for the installation of any geothermal borehole on water company owned land.

Separation distances are based on the withdrawal rate of the well as stipulated in Section 19-13-B51d of the Public Health Code (PHC). Wells that are used for both the drinking water supply and a Geothermal System may have flow rates that require increased separation distances than usually required for domestic private wells.



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**CLOSED LOOP GEOTHERMAL SYSTEMS**

Closed loop systems may utilize vertical boreholes or horizontal trenches. These systems circulate a heat transfer fluid through a series of piping in the ground and a heat exchanger located in a dwelling. Closed loop boreholes are considered non-water supply wells, and as such the provisions for locating wells that are included in PHC Section 19-13-B51d would not be applicable. However, it should be understood that closed loop geothermal systems that are installed contrary to the construction standards included in the report to the legislature might constitute a source of pollution and the location relative to water supply wells must be considered. The Department advises that environmental health professionals consider the recommendations made to the legislature. The report may be downloaded from the State library website:

**[http://www.ct.gov/dph/lib/dph/governmental\\_relations/2007reports/geothermal\\_well\\_report.pdf](http://www.ct.gov/dph/lib/dph/governmental_relations/2007reports/geothermal_well_report.pdf)**

Some key points to consider concerning the recommendations:

1. Any connection between a geexchange system and a domestic water supply should be protected with the installation of a reduced pressure backflow preventor.
2. Geexchange boreholes should be a minimum of four (4) times the inside diameter (id) of an individual loop pipe supplying the system, and shall be a minimum of four (4) inches in diameter.
3. Geexchange boreholes should not be yield tested.
4. Vertical boreholes for closed loop systems should be filled entirely with grout. The grout acts as a heat transfer media, protects the piping, and would help to contain any fluids in the event of a leak.
5. Heat transfer fluids should be non-toxic. The Department has recommended potable water and solutions of either potassium acetate or propylene glycol as appropriate choices.

The following table depicts the separation distances recommended in the report for closed loop systems. Prior to allowing these reduced separation distances, we recommend the licensed well driller certify that they will follow the recommendations made in the report concerning the installation of the vertical borehole and the geothermal system. This certification can be made on the well drilling permit or as an attached document. The geothermal system should be considered a source of pollution relative to water supply wells in the event such certification is not supplied to the local health department. The January 1, 2007 revision of the *Technical Standards for Subsurface Sewage Disposal Systems* stipulates a minimum separation distance of 75 feet to geothermal wells, however, a special provision under Item A in Table No. 1 of Section II, allows for a reduced distance if so authorized by the Commissioner of Public Health. Refer to EHS Circular Letter #2007-12 for requirements for reduced distances to closed loop geothermal systems.

Structure	Closed Loop Geothermal System Separation Distance
Private Water Supply well, withdrawal rate < 10 gal/min	25 Feet
Private Water Supply well, withdrawal rate >10 gal/min	50 Feet
Public Water supply well, withdrawal rate <10 gal/min	25 feet*
Public Water Supply well, withdrawal rate >10 and <50 gal/min	50 feet*
Public Water Supply well, withdrawal rate > 50 gal/min	200 Feet*
Source of Pollution (subsurface sewage, leaching field, grinder pump on sewer lateral, known releases of hazardous materials, structures or containers (tanks) of hazardous substances located above or below ground or other known source of contamination)	50 Feet. A separation distance of 25 feet may be used for septic tanks that meet the performance testing criteria specified in Section V(A)(6) of the <i>Technical Standards</i>
Separation Distance from high water mark of any surface water body or drain carrying surface water or of a foundation drain	10 Feet

\*A permit is required pursuant to CGS Section 25-32(b) from the Commissioner of the Department of Public Health if a geothermal borehole is to be installed on water company owned land.

If you have any questions concerning this guidance please contact the following:

- Geothermal Systems and Private Wells  
Ray Jarema, Supervisor, Private Well Program, (860) 509-7296
- Geothermal Systems and Subsurface Sewage Disposal Systems  
Robert Scully, Supervising Sanitary Engineer, Environmental Engineering Program, (860) 509-7596
- Geothermal Systems and Public Water Supplies  
Cam Walden, Supervising Sanitary Engineer, (860) 509-7333
- Water Company Lands Permits  
Lori Mathieu, Public Health Services Manager, (860) 509-7333
- DEP Permitting  
Don Gonyea, Environmental Analyst III, (860) 424-3018

Cc. Ellen Blaschinski, R.S., M.B.A., Chief, Regulatory Services Branch  
Darrell B. Smith, Chief, Drinking Water Section, DPH  
Karen Buckley-Bates, Director, Government Relations  
William Gerrish, Director Office of Communications, DPH





REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS  
696 VIRGINIA ROAD  
CONCORD, MASSACHUSETTS 01742-2751



February 10, 2011

Regulatory Division  
CENAE-R-PEB  
File Number: 2011-176

Connecticut State University System  
c/o Keith Epstein, Baystate Environmental Services  
39 Woodland Street  
Hartford, CT 06105

Dear Mr. Epstein:

We have reviewed the Environmental Impact Evaluation submittal, dated January 18, 2011, for the proposed reorganization of the Westside and Midtown Campuses, of Western Connecticut State University, in Danbury, Connecticut. It appears that the project will require authorization from the Corps of Engineers. Specifically, your proposal includes impacts to approximately 1,300 square feet of non-tidal wetlands, as a result of ball field and roadway construction. The work may qualify for authorization under the Connecticut Programmatic General Permit (GP). A copy of the GP is attached. The specific permit authorization and the potential need for compensatory mitigation for these impacts will be determined once an application for authorization is received by the Corps.

Upon receipt of an application, we will determine the Least Environmentally Damaging Practicable Alternative, (LEDPA). Section 230.10 (a) states, "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." The following is an explanation of Corps jurisdiction as defined by Section 404 of the Clean Water Act.

Permits are required under Section 404 for discharges of dredged or fill material into all waters of the United States, including navigable waters, inland rivers, lakes, streams, and wetlands, as well as the excavation/grading within these waters/wetlands. On the coastline, our jurisdiction extends landward to the high tide line (i.e., the highest predictable tide) or to the landward limit of any wetlands, whichever is more extensive. In interior waters, our jurisdiction extends landward to the ordinary high water mark or to the landward limit of any wetlands, whichever is more extensive.

The term "wetlands" is defined by Federal regulations as "...those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions..." (Federal Register, November 13, 1986 33 CFR Part 328.3(b)). Wetlands generally include swamps, marshes, and bogs; however, forests and meadows that lack surface waters can also be wetlands. In addition, wetland delineations as determined for Federal, state, and local agencies might not be interchangeable.

If you have any questions, please contact Amy Bourne of my staff at (978) 318-8651.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. DeSista". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert J. DeSista  
Chief, Permits & Enforcement Branch  
Regulatory Division

Attachment

## Responses to Comments

### State of Connecticut Department of Environmental Protection (DEP)

March 4, 2011

DEP-1            Comment: *“In order to make a definitive determination as to Category I eligibility for Section 404 and Section 401 permitting under the Department of the Army, Programmatic General Permit, State of Connecticut, documentation of wetland impacts, including an accounting of any previous direct and secondary wetland impacts, should be submitted to the Army COE as part of a single and complete project review”*

DEP-1            Response: The Connecticut State University System (CSUS) and Department of Construction Services (formerly DPW) will comply with the procedures of the Programmatic General Permit (PGP) including a documentation of wetland impacts that have occurred on campus in the past, both direct and indirect. This will be done during the Section 404/401 permitting stage for the design of the ballfield(s) or any other activity subject to these Acts and their implementing regulations.

DEP-2            Comment: *“The effectiveness in treating bacteria and phosphorous should be major criteria in the selection of stormwater control measures at the campus.”*

DEP-2            Response: CSUS recognizes the importance of protecting the Still River and will consider all feasible measures to reduce bacteria and phosphorous loadings from its Midtown and Westside Campus at Western Connecticut State University. For the Visual Performing Arts Center (VPAC) at the Westside Campus, a sand filter has been designed to treat stormwater from the proposed facility. This will help to reduce bacteria and some phosphorous loadings to the Still River and its tributaries.

The Integrated Pest Management (IPM) and turf management measures currently being implemented at both campus will continue to be implemented so as to reduce phosphorous applications for lawn management. The use of synthetic playing surfaces, as has been done for the Football Stadium, will also be evaluated for new and existing fields in an effort to reduce maintenance needs and fertilizer and pesticide control/management applications.

Where feasible, infiltration will be implemented into the design of facilities at both campuses. High groundwater and shallow depth to bedrock will make this infeasible in many areas of the campuses, however efforts will be explored to reduce phosphorous and bacteria loadings.

DEP-3            Comment: *“Given that the new facilities will tend to be water efficient due to LEAN standards, the ability of utilities (Danbury Water and Sewer) to meet increased demand should not be a major issue. Nevertheless, in the interest of compiling a thorough evaluation, this should be confirmed.”*

DEP-3            Response: The Danbury Water Department (DWD) is in the process of exploring measures to increase the safe yield of its potable water supply. While the demands of its customers are currently being met and are expected to be met in the future, the Department of Public Health recommends a 15% margin of safety of the safe yield, which the DWD, with its current system, would not be able to meet. The City is investigating ten projects that would increase capacity including additional pumping of the Lake Kenosia aquifer and/or connection with the Housatonic Well Field operated by Aquarion (City of Danbury, 2010) as stated in a February 4, 2010 from DWD to Paul Stacey, DEP Bureau of Water Protection and Land Reuse. Regardless of these Master Plan projects, the DWD will be increasing its potable water supply output in the near future.

As stated in the EIE, the new buildings and major renovations at each campus will be LEED Certified or equivalent and, therefore, would utilize less water than traditional buildings. Student enrollment is expected to increase thereby increasing demand on the DWD system, however some of these students who already live within the DWD service area are already served, therefore the projected water demand stated in the EIE, which does not consider neither this fact nor the water savings associated with LEED Certified buildings, is very conservative. Using a growth rate of approximately 3% calculated as part of the 2007 Master Plan, there would be an additional 600 students in 2015. With an average yearly water demand of approximately 2,000 gallons per student per year, this would result in an increase of approximately 1.2 million gallons per year which is 0.05% of the DWD's currently yearly production of 2,555 million gallons.

DEP-4            Comment: *“The Department recommends that provisions to either utilize new equipment or require retrofits to reduce diesel emissions be included in the construction contracts for the various master plan projects.”*

DEP-4            Response: The DCS construction documents already contain such language to reduce air pollution emissions.

DEP-5            Comment: *“Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.”*

DEP-5            Response: The recommended language is already included in the DCS contract documents and is already an enforceable action per contracts. In addition, the contractor is also required to be in compliance with various statutes and regulations per contract specifications.

DEP-6            Comment: *“Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible.”*

DEP-6            Response: As most of the Master Plan projects will be LEED certified or equivalent, there will be an emphasis on the reuse of existing building materials. There are numerous LEED credits that can be obtained for reuse of building materials as listed in Section 3.14.3 of the EIE.

DEP-7            Comment: *“It is recommended that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling.”*

DEP-7            Response: Thank you for the comment. Such plans are created during the design phase and companies (contractors) bidding on a state project do not submit plans as part of their bids. Unfortunately, the state statutes regulate contracting award standards and criteria focus on low bidder, versus the use of non-monetary criteria.

DEP-8            Comment: *“The general maps of the existing stormwater system for the Westside Campus were not included in Appendix B, as noted on page 4”.*

DEP-8            Response: Correct. Appendix B contains the detailed utility mapping, including stormwater, for the Midtown Campus. The general stormwater mapping for the Westside Campus is shown in Figure 3-6 of the EIE.

**State of Connecticut Department of Public Health (DPH-1)  
March 2, 2011**

DPH-1            Comment: *“Projects that include any renovation, remodeling or demolition of existing buildings, or the excavation of soils, requires a plan to address asbestos since these types of construction activities could result in the disturbance of surfaces that may contain asbestos. When a building is to be constructed, it should be built using radon resistant features.”*

DPH-1            Response: The sponsoring and participating agencies require, and will continue to require asbestos abatement plans for building renovation projects. For new projects or major expansions, radon mitigation features will be assessed to their applicability during the design phase of each project.

**State of Connecticut Department of Public Health (DPH)**

**March 4, 2011**

DPH-2            Comment: *“A mini power plant is proposed to be constructed within a parking garage which is proposed to be located within the Kenosia Wellfield Level A APA. Danbury has adopted Aquifer Protection Regulations which regulate and restrict certain activities within the APA. These regulations should be consulted to ensure that activities associated with the operation of this power plant are in compliance with the regulations.*

DPH-2            Response: As much of the campus is located within the aforementioned APA, CSUS routinely refers to and complies with the City’s Aquifer Protection Regulations. These efforts will continue for those projects to be located within the APA, which includes the western half of the Westside Campus.

The proposed mini power plant to be constructed within the parking garage will need to comply with the City of Danbury Aquifer Protection Area Regulations. If natural gas or propane is used as the fuel source, then this would be a non-regulated activity, but still reportable under the regulations. If fuel oil is used, then special provisions will be made to ensure that it is contained within the structure and not released to surface waters or groundwater in accordance with applicable regulations.

DPH-3            Comment: *“The Danbury Water Department should be consulted to determine if there are areas on the Westside Campus where infiltration of untreated or minimally treated stormwater may be a concern to the quality of the water in its source water area. LID measures should be planned with the type of public drinking water resource to be protected in mind”.*

DPH-3            Response: The Danbury Water Department was consulted during the preparation of this EIE regarding water supply infrastructure and protection issues. The Westside Campus is constrained for stormwater LID use potential given the shallow depth to bedrock in many areas, however there are areas on the eastern portion of the campus which may have some infiltration potential. As stated in the EIE and the Stormwater Master Plan, infiltration underneath the existing athletic fields on the eastern portion of the campus, outside of the Aquifer Protection Area, is a promising major LID measure that can be employed on campus. During individual project designs, the DWD will be consulted if the site design proposes infiltration within the APA.

DPH-4            Comment: *“For clarification purposes, please note that the Department of Consumer Protection is the lead agency responsible for developing regulations for geothermal wells in conjunction with the Department of Public Health and the Department of Environmental Protection. While these regulations are under development it is recommended that geothermal systems are constructed in accordance with the document Report to the*

General Assembly Recommendations for Regulations of Geothermal Wells Revision 2.0 dated March 5, 2007.

DPH-4 Response: As stated in the EIE, the construction of a geothermal well system is being considered for the VPAC, but no decision has been made at this time. Nevertheless, if it is decided to construction the system, then it will be done so in accordance with the aforementioned document. Because of its proposed location within the APA, the DWD will be consulted as well.

DPH-5 Comment: *“The Danbury Water Department and the DWS should also be notified if these issues [encountering soil or groundwater contamination during construction] are encountered within the Kenosia Wellfield Level A APA and Lake Kenosia Diversion public water supply watershed.”*

DPH-5 Response: In the unlikely event that soil and/or groundwater contamination is encountered during construction, the Danbury Water Department will be notified if it is located within the aforementioned protection areas.

DPH-6 Comment: *“No construction should take place before erosion and sedimentation controls are installed. These controls should be installed, properly functioning, inspected regularly and remain in place throughout the project. All activities should be conducted during dry weather conditions. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly maintained. No herbicides or pesticides should be in any seed mix.”*

DPH-6 Response: Such measures are standard and are covered under existing DCS contract documents and specifications.

DPH-7 Comment: *“Develop an Emergency Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.”*

DPH-7 Response: Such mitigating measures exist within DCS contract documents.

DPH-8 Comment: *“Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.”*

DPH-8 Response: Such mitigating measures exist within DCS contract documents.

DPH-9           Comment: *“A specific area of the project site outside of the public water supply source water areas should be designated for auto parking, vehicle refueling and routing maintenance. Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment refueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.”*

DPH-9           Response: Vehicle fueling and maintenance activities at the Westside Campus will occur outside of the Aquifer Protection Area. Construction plans will designate a suitable area(s) for these activities and signage will be erected to remind construction workers of the need to conduct such activities at designated locations.

DPH-10          Comment: *“Notification of the project start date should be sent to all affected public water systems as soon as it has been determined. A representative of the Danbury Water Department should be granted site access to review compliance with construction site best management practices. The Danbury Water Department and Drinking Water Section must be notified immediately of any chemical/fuel spill at the construction site, along with the Department of Environmental Protection’s Oil and Chemical Spill Response Unit. Emergency telephone numbers and a statement identifying the construction site as sensitive public water supply area should be posted where they are readily visible to contractors and other on-site personnel. A note should be added to the site plans stating the sensitivity of the area.”*

DPH-10          Response: Such notification practices are standard with DCS contract documents.

**State of Connecticut Department of Transportation (DOT)  
February 24, 2011**

No response required.

**Department of the Army, New England District Corps of Engineers (ACE)  
February 10, 2011**

No response required.