

DECEMBER 2017

# FINAL

## Environmental Assessment (EA) & Environmental Impact Evaluation (EIE) for Obstruction Removal

### Danielson Airport (LZD)

Prepared for:



Prepared by:





FINDING OF NO SIGNIFICANT IMPACT  
ENVIRONMENTAL ASSESSMENT (EA)  
FOR OBSTRUCTION REMOVAL

DANIELSON AIRPORT (LZD)

FAA AIP NO. 3-09-0900-010-2014

CAA CONTRACT NO. 2014-02

CHA CONTRACT NO. 29067

May 2017

Prepared for:  
Connecticut Airport Authority (CAA)



Prepared BY:  
CHA Consulting, Inc.



Danielson Airport (LZD)  
Obstruction Analysis -Tree Removal

**FEDERAL FINDING**

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed federal action is consistent with existing national policies and objectives as set forth in Section 101 of the National Environmental Policy Act (NEPA) and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 101 (2) (c) of the NEPA.

A handwritten signature in blue ink, appearing to read "R. Doucette", is written over a horizontal line.

Approved: \_\_\_\_\_  
Richard Doucette  
Manager, Environmental Programs

5/17/2017  
\_\_\_\_\_ Date



# RECORD OF DECISION ENVIRONMENTAL IMPACT EVALUATION (EIE) FOR OBSTRUCTION REMOVAL

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**Notice:** On November 11, 2017, the State of Connecticut, Office of Policy and Management (OPM) determined that the Connecticut Airport Authority (CAA) “shall not be construed to be a department, institution or agency of the state”, and that the Connecticut Environmental Policy Act (CEPA) is not applicable to CAA actions. See CT OPM notice included in Appendix B. As such, environmental review for the project is not subject to CEPA, and this ROD (prepared prior to November 2017) is not applicable. Nevertheless, as this study followed the CEPA process, the ROD and references to CEPA and the EIE were retained for informational purposes.

### 1.0 DECISION

The Connecticut Airport Authority (CAA), owner and operator of the Danielson Airport (LZD) intends to implement the proposed action detailed in the Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal issued on April 2017 and included with this document.

A single document serving as an EA/EIE was prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 and the Connecticut Environmental Policy Act (CEPA) to address the potential impacts associated with the objects that penetrate the airspace which are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft. As the airspace surfaces extend well

beyond the airport's property boundary, this EIE includes an off-airport obstruction removal and mitigation review.

This decision is based on careful consideration of the alternatives and potential environmental impacts documented in the Final EA/EIE.

## **2.0 PROJECT LOCATION AND SUMMARY OF ACTION**

The Danielson Airport is located in the Town of Killingly, Windham County, Connecticut, approximately 25 miles west of Providence, RI and 41 miles east of Hartford, CT. The airport encompasses approximately 257 acres, and is owned by the CAA. The airport sits in the Quinebaug River Valley, and is bordered by the river to the west and south. Airport access is provided from Airport Road (off Upper Maple Street), approximately two miles north of Interstate 395 (at Exit 91) and Route 6 (Providence Pike). The airport property is bordered by the Quinebaug River, which is also the municipal boundary between the Towns of Killingly and Brooklyn.

Based on the evaluation identified in the Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal document, and the review by CAA and FAA, the Modified Obstruction Removal Alternative has been chosen as the "Proposed Action" and "Preferred Alternative" for Danielson Airport. This determination is primarily related to the Full Removal Alternative being considered not practical or feasible from an environmental and cost standpoint. The No Action Alternative is also not considered appropriate as it does not address the safety of airport users and does not satisfy FAA requirements or obligations.

## **3.0 STATEMENT OF ENVIRONMENTAL IMPACT**

No significant impacts to the environment are anticipated as a result of the proposed action. All practicable means to avoid or minimize any associated environmental impacts as identified in the Final EA/EIE will be adopted. The mitigation measures identified in the Final EA/EIE will be adopted and implemented as part of the proposed action.

## **4.0 SUMMARY OF AGENCY CONSULTATION AND PUBLIC COMMENTS**

A Scoping Notice was published in the CEPA Environmental Monitor on June 16, 2015 to allow for 30 days of public comment, ending on July, 17, 2015. The Connecticut DEEP provided scoping comments dated July 17, 2015 which can be found in the attached Final EA/EIE document which follows the ROD.

A Draft EA/EIE was prepared for the project in February 2016 and submitted to the stakeholder agencies for review and comment. Contact was also initiated with federal and state resource agencies prior to the Draft EA/EIE during the development of alternatives, including:

- The Connecticut Department of Energy and Environmental Protection (CTDEEP), Office of Environmental Review
- The Connecticut Department of Energy and Environmental Protection (CTDEEP), Bureau of Outdoor Recreation
- Connecticut Department of Economic & Community Development, State Historic Preservation Office (SHPO)
- State of Connecticut Department of Public Health
- Tribal Historic Preservation Officers of the Mashantucket Pequot Tribal Nation and the Mohegan Tribe.

In January, 2017 the Draft EA/EIE was issued and made available for review and comment on the CAA project website (<http://danielsonairport.caa-analysis.com/>) and published in the Environmental Monitor (<http://www.ct.gov/ceq/cwp/view.asp?a=987&Q=578776>). A notice of the Draft EA/EIE publication, including information on how the document could be accessed, the location, date and time of the public informational meeting, and details on the comment process, was advertised in The Bulletin and The Shoppers Turnpike. The Bulletin advertisement was posted on February 6<sup>th</sup>, 2017 and February 13<sup>th</sup>, 2017. The Shoppers Turnpike advertisement was posted on February 8<sup>th</sup>, 2017. **Per CEPA requirements, this notice was also mailed to CTDEEP, the Town of Killingly, and the Connecticut Office of Policy and Management (OPM).** Comments were accepted through Monday March 3<sup>rd</sup>, 2017. A total of five comment letters or emails were received during this period from agencies and the public and can be found in Appendix B of the accompanying EA/EIE.

A public informational meeting was held on February 23<sup>rd</sup>, 2017 at the Killingly Town Hall in the Town Meeting Room, 172 Main Street, Killingly, CT 06239. This meeting was attended by representatives from CAA and CHA Consulting, Inc. who introduced the project and discussed the identified alternatives and proposed action. This meeting was attended by thirteen (13) members of the public.

Comments and issues identified from the public and agency stakeholders were reviewed, acknowledged and incorporated into the alternatives analysis, proposed action, project design and analysis of environmental consequences where feasible and practicable. **The Final EA/EIE including such revisions was publicly displayed and available for comment on the CAA project website (<http://danielsonairport.caa-analysis.com/>) in order to fulfill the requirements of CEPA and is included as part of the ROD.** Agencies that commented on the Draft EA/EIE as well as municipalities affected by the action were notified of the availability of the Final EA/EIE.





# FINAL ENVIRONMENTAL ASSESSMENT (EA) FINAL ENVIRONMENTAL IMPACT EVALUATION (EIE)

The complete report can be found on the CAA website at  
<http://danielsonairport.caa-analysis.com/>



**FINAL ENVIRONMENTAL ASSESSMENT (EA) &  
ENVIRONMENTAL IMPACT (EIE) EVALUATION FOR  
OBSTRUCTION REMOVAL  
DANIELSON AIRPORT (LZD)**

FAA AIP NO. 3-09-0900-010-2014

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Prepared BY:  
CHA Consulting, Inc.



In Association with:  
DY Consultants, Inc.  
Fitzgerald & Halliday, Inc.



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## LIST OF ACRONYMS

ACRONYMS	
ABBREVIATION	MEANING
AAC	Aircraft Approach Category
AC	Advisory Circular
ADG	Airplane Design Group
ARC	Airport Reference Code
CAA	Connecticut Airport Authority
CEPA	Connecticut Environmental Policy Act
CFR	Code of Federal Regulations
CIP	Capital Improvement Program
DEEP	Connecticut Department of Energy and Environmental Protection
DOT	US Department of Transportation
EA	Environmental Assessment (Federal)
EPA	US Environmental Protection Agency
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulation
FEMA	Federal Emergency Management Agency
LZD	Danielson Airport
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
PIAS	National Plan of Integrated Airport Systems
O3	Ozone
OCS	Obstacle Clearance Zone
OFZ	Obstacle Free Zone
RDC	Runway Design Code
ROFA	Runway Object Free Area
RPZ	Runway Protection Zone
RSA	Runway Safety Area
TERPS	Terminal Instrument Procedures
VFR	Visual Flight Rules

Note that substantive report edits between the Draft EA and the final document are indicated with underlined text.

## 1.0 INTRODUCTION

This Environmental Assessment (EA) documents the evaluation of potential impacts associated with tree removal Danielson Airport which is operated by the Connecticut Airport Authority (CAA). The evaluation addresses obstruction removal associated with Federal Aviation Regulations (FAR) Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace and published Terminal Instrument Procedures (TERPS), which define the airspace surrounding runways. Objects that penetrate the airspace are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft. As the airspace surfaces extend well beyond the airport's property boundary, this EA includes an off-airport obstruction removal and mitigation review. It is noted that tree removal activities may require environmental permits based on site conditions, which will be made in coordination with the Connecticut Department of Energy and Environmental Protection (CTDEEP). Tree removal activity may also require the purchase of permanent easements for removals located on private property.

This EA was prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 and the Connecticut Environmental Policy Act (CEPA) to address potential impacts associated with the tree obstruction removal while providing the opportunity for public involvement and comments. The study was conducted in accordance with Federal Aviation Administration (FAA) guidelines including the "Environmental Desk Reference for Airport Actions", FAA Order 5050.4B "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions" and FAA Order 1050.1E "Environmental Impacts: Policies and Procedures." Since the project would potentially be federally-funded, the EA must comply with federal requirements (i.e., NEPA, FAA).

As part of a previous study, the CAA and Federal Aviation Administration (FAA) have identified that trees penetrate the airspace of Danielson Airport, including locations beyond airport property.

This EA includes the following sections:

- Introduction
- Purpose and Need
- Alternatives Analysis and Proposed Action
- Affected Environment
- Environmental Consequences
- List of Preparers
- Correspondence and Public Comments

### 1.1 PROJECT LOCATION AND EXISTING FACILITIES

The Danielson Airport is located in the Town of Killingly, Windham County, Connecticut, approximately 25 miles west of Providence, RI and 41 miles east of Hartford, CT. The Airport encompasses approximately 257 acres, and is owned by the CAA. The Airport sits in the Quinebaug River Valley, and is bordered by the river to the west and south. Airport access is provided from Airport Road (off Upper Maple Street), approximately two miles north of Interstate 395 (at Exit 91) and Route 6 (Providence Pike). The airport property is border by the Quinebaug River, which is also the municipal boundary between the Towns of Killingly and Brooklyn.

### Runway 13-31

Runway 13-31 is the only runway and is 2,700 feet long and 75 feet wide, and constructed of bituminous concrete. The runway is served by a full parallel taxiway (Taxiway Alpha) to the north. Both runway ends have FAR Part 77 obstructions to the approach surfaces.

TABLE 1- EXISTING AIRPORT FACILITIES	
RUNWAY 13-31	
Runway Length (Feet)	2,700'
Width (Feet)	75'
Surface Type	Bituminous concrete
Parallel Taxiway	TWY A
Threshold Displacement (Feet)	RWY 13: None
	RWY 31: None

Source: Data Compiled by CHA Consulting, Inc. (2015)

## 1.2 BASED AIRCRAFT AND AVIATION ACTIVITY

Danielson Airport is a general aviation facility that serves light private, corporate, and charter aircraft operating for recreational/personal, training, and business purposes. The Airport does not offer scheduled airline service. There are a total of 35 based aircraft at the Airport.

Table 2 lists the existing based aircraft and Table 3 depicts annual operations at Danielson Airport (or LZD). Note that an aircraft operation is defined as either one landing or one takeoff, therefore each flight includes at least two operations which consists of one takeoff and one landing.

TABLE 2- BASED AIRCRAFT							
	SINGLE ENGINE	MULTI ENGINE	JET	ROTOR	GLIDERS	MILITARY	TOTAL
Based Aircraft	29	1	0	0	5	0	35

Source: FAA 5010 Data Dated (2015)

TABLE 3- ANNUAL OPERATIONS						
	AIR CARRIER	AIR TAXI	GA LOCAL	GA ITINERANT	MILITARY	TOTAL
Operations	0	72	17,500	6,000	120	23,692

Source: FAA 5010 Data Dated (2015)

Appendix A contains a map that represents the Project Study Area and depicts the location of the airport and the general approaches to each runway end. Chapter 3, identifies the specific recommended tree removal locations.

## 1.3 FAA DESIGN STANDARDS

The design, or critical, aircraft is defined as the most demanding aircraft operating or projected to operate on the airport's runway, taxiway, or apron. According to the FAA, the design aircraft can be either a specific aircraft model or a composite of several aircraft, and must account for a minimum of 500 annual itinerant operations.



The FAA uses the approach speed and wingspan of the design aircraft to classify the airport. The FAA term for this classification is the airport reference code (ARC). Table 4 provides the FAA specifications associated with the ARC classification system.

TABLE 4 - AIRPORT REFERENCE CODES				
AIRCRAFT APPROACH CATEGORY (AAC) <sup>1</sup>		AIRPLANE DESIGN GROUP (ADG) <sup>2</sup>		
CATEGORY	APPROACH SPEED	GROUP	TAIL HEIGHT	WINGSPAN
A	Approach speed less than 91 knots	I	< 20'	<49'
B	Approach speed 91 knots or more but less than 121 knots	II	20' - < 30'	49' - < 79'
C	Approach speed 121 knots or more but less than 141 knots	III	30' - < 45'	79' - < 118'
D	Approach speed 141 knots or more but less than 166 knots	IV	45' - < 60'	118' - < 171'
E	Approach speed 166 knots or more	V	60' - < 66'	171' - < 214'
		VI	66' - < 80'	214' - < 262'

Source: FAA AC 150-5300-13A, Airport Design<sup>1</sup>

As previously identified, Danielson Airport is served by one runway (Runway 13-31). The design aircraft for Runway 13-31 is a Piper Navajo which has an aircraft approach category (AAC) of B and an airplane design group (ADG) of I. Therefore, based on these design aircraft characteristics for Runway 13-31, the airport reference code is B-I. Table 5 provides a summary of the runway design codes (RDC) classifications for the runway at LZD.

TABLE 5 - RUNWAY DESIGN CODE SUMMARY			
Runway	Design Aircraft	AAC	ADG
13-31	Piper Navajo	B	I

Source: Danielson Airport Master Plan Update (2008)

After determining the airport runway design code, the airport itself is classified with the appropriate ARC. The ARC is used for airport planning and design purposes and is determined by the highest RDC at the airport. The ARC uses the same classification system as the RDC, therefore, the ARC for LZD is classified as B-I.

### Airspace Obstructions

Overall airspace obstructions include penetrations to any number of defined airspace surfaces, but predominantly include FAR Part 77 imaginary surfaces and Terminal Instrument Procedures (TERPS) surfaces, which define the airspace surrounding runways. The most restrictive surfaces are usually the Part 77 surfaces, which are discussed below.

The FAA's Federal Aviation Regulation Part 77, titled Obstructions Affecting Navigable Airspace are used to determine obstructions to air navigation and communication facilities. These are commonly referred to as "imaginary surfaces" and are established with relation to the airport and to each runway. The size of each such imaginary surface is based on the category of each runway according to the type of approach available or planned for that runway. The slope and dimensions of the approach surface applied to each end of a runway are determined by the most precise approach procedure existing or planned for that runway end. The definitions of the Part 77 imaginary surfaces are listed below.

### Horizontal Surface

The horizontal surface is established 150 feet above the airport elevation. The perimeter of the horizontal surface created by swinging arcs of a specified radii from the center of each end of the primary surface of each runway of each airport and connecting the adjacent arcs by lines tangent to those arcs.

### Conical Surface

A surface extending outward and upward from the periphery of the horizontal surface at a slope of 20 to 1 for a horizontal distance of 4,000 feet.

### Primary Surface

A surface longitudinally centered on a runway that extends 200 feet beyond each end of that runway. The elevation of any point on the primary surface is the same as the elevation of the nearest point on the runway centerline.

### Approach Surface

A surface longitudinally centered on the extended runway centerline and extending outward and upward from each end of the primary surface. An approach surface is applied to each end of each runway based upon the type of approach available or planned for that runway end.

### Transitional Surface

The transitional surface extends outward and upward at right angles to the runway centerline and the runway centerline extended at a slope of 7 to 1 from the sides of the primary surface and from the sides of the approach surfaces.

Table 6 summarizes the FAR Part 77 surface dimensions at Danielson.

TABLE 6- FAR PART 77 SURFACE DIMENSIONS (FEET)		
SURFACE	RUNWAY 13	RUNWAY 31
Primary Surface Width	250	250
Horizontal Surface Radius	5,000	5,000
Approach Surface Width at End	1,250	1,250
Approach Surface Length	5,000	5,000
Approach Procedure	Visual	Visual
Approach Slope	20:1	20:1

Source: Danielson Airport Master Plan Update (2008)

In addition to the Part 77 surface dimensions, the United States Standards for TERPS are used by FAA to develop all instrument approaches and other procedures to airports. These procedures are used by aircraft when visibility and cloud ceilings are low. TERPS are defined in FAA Order 8260.3B, and include numerous approach and departure surfaces surrounding runways. As the TERPS surfaces can be complex and differ from Part 77 surfaces, the FAA has provided overall airport design standards for obstruction clearing beyond any runway.

These obstruction clearing standards are defined in FAA Advisory Circular 150/5300-13A, Airport Design, and determined the minimum obstruction removal required for any runway end. In locations off-airport property, where the CAA does not own rights to clear all airspace penetrations, clearing the minimum design standards defined in the Advisory Circular may be the most feasible alternative.

## 2.0 PURPOSE AND NEED

**Purpose:** The purpose of the proposed obstruction removal project evaluated in this Environmental Assessment (EA) is to promote safety by bringing the airport into compliance with Federal Aviation Administration (FAA) design standards and regulations regarding clear airspace.

**Need:** The FAA has established airspace and design criteria to provide for safe aircraft operations. In 2012 the State conducted an obstruction study to evaluate the airspace at the Airport. Based on the FAA design criteria, the results of this analysis identified existing safety deficiencies at LZD which include multiple obstructions to the Federal Aviation Regulation (FAR) Part 77 surfaces, Terminal Instrument Procedures (TERPS), and Airport Design Standards. The results of this study identified that the Airport does not provide adequate airspace surfaces to its runways.



### 3.0 ALTERNATIVES ANALYSIS AND PREFERRED ACTION

This chapter of the Environmental Assessment (EA) addresses the potential alternatives for airport obstruction removal at Danielson Airport. The recent airport obstruction study identified areas of tree obstructions in all areas surrounding the airport. The ideal alternative from an aeronautical standpoint would be to remove all tree penetrations to the Federal Aviation Regulation (FAR) Part 77 "Objects Affecting Navigable Airspace" and Terminal Procedures (TERPS) surfaces. However, as part of the scoping process for this study, it was determined that this approach would be impractical, and other other alternatives would need to be developed.

The National Environmental Policy Act (NEPA) and FAA Order 5050.4B require the consideration of alternatives commensurate with the purpose and need statement. The intent is to evaluate various options that address the recognized need so that potential environmental impacts can be compared and minimized. This chapter presents the various options considered, as well as those deemed infeasible. Where appropriate, removal methods, and site specific procedures are also discussed.

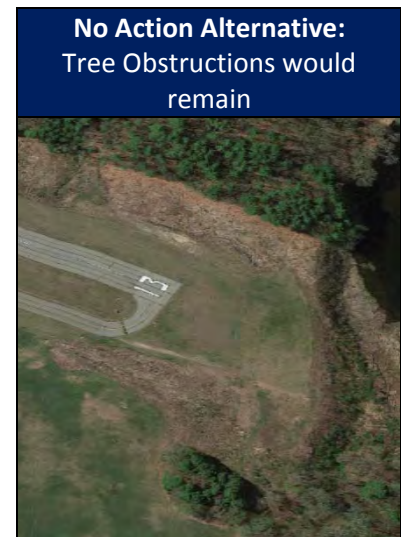
#### 3.1 ALTERNATIVES UNDER CONSIDERATION

As part of the effort to identify project alternatives, the recommendations from the 2012 Obstruction Evaluation were considered, as well as agency comments and the concerns of affected parties and property owners. This coordination effort took into consideration both the environmental and socioeconomic impacts as well as costs which were evaluated as part of the process to refine and develop the alternatives. The results of this refinement resulted in two alternatives plus the No Action option. All three are presented herein for consideration.

##### 3.1.1 No Action Alternative

The No Action Alternative retains all obstructions, with CAA taking no action to address airspace hazards. The existing trees and other obstructions would continue remain as penetrations to the local airspace. As this option results in potential dangers to users of the airport, and persons on the ground, it is not desirable from the perspective of the flying public. Mitigating potential airspace hazards is an important mission of the CAA and FAA. In fact, addressing airspace hazards is required by the FAA. Although, this alternative fails to improve safety for passengers and crews operating at the airport, it serves as the baseline for comparison to the build alternatives.

The No Action Alternative has the least potential impact to the environment and effect on property owners. This option also has no implementation costs. The No Action alternative cannot be selected as the preferred action as it would violate the airports federal obligations for hazard removal and mitigation. Airports developed or improved with federal funds are obligated to prevent the growth or establishment of obstructions in the approaches to the airport and to take reasonable actions to remove existing obstructions. This requirement is discussed in the FAA Airport Compliance Manual (FAA Order 5190.6B), which sets forth policies and procedures to be followed by public airports. This requirement is also listed in federal grant assurance No. 20, Hazard Removal and Mitigation of the Airport Improvement Program (AIP), per Federal Statute 49 U.S.C., Section 47101.



It is also noted that the No Action Alternative does not eliminate potential environmental and social impacts as the increased risk of airport operations poses an impact to airport users. Potential aircraft incidents could create environmental damage to wetlands, habitat, and endanger emergency responders and even persons and property on the ground.

The following summary box highlights potential advantages and disadvantages of the No Action Alternative.

No Action Alternative	
Goal(s): This option reduces impacts as it takes no action to remove, lower, mark, or mitigate existing or potential future airspace obstructions.	
Description: Tree obstructions have been identified at both runway ends, Transitional Surface areas, and the outer airspace of the Horizontal and Conical Surfaces. These presumed hazards would remain in place, and potentially increase in size and penetration with additional tree growth.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>No wetland impacts (temporary or permanent)</li> <li>No impacts to biological resources, habitats, or species of concern</li> <li>No impacts to parks or recreation</li> <li>No impacts or disturbance to property owners</li> <li>No project costs</li> </ul>	<ul style="list-style-type: none"> <li>Retains potential hazards to airport users</li> <li>Retains a potential hazard to people and property on the ground surrounding the airport</li> <li>Does not comply with FAA design standards or grant assurances</li> <li>Risks future FAA funding for improvements to the airport</li> </ul>

3.1.2 Full Obstruction Removal Alternative

The Full Obstruction Removal Alternative would clear all obstructions to the FAR Part 77 Approach and Transitional Surfaces. These surfaces are generally the most encompassing for approach protection, whereas if cleared, it would generally assure clearance of other airspace surfaces (e.g., TERPS, threshold surface, etc.). Within the outer Part 77 surfaces (i.e., Horizontal and Conical), this alternative includes obstruction lighting for the high terrain and tree obstructions surrounding the airport.

The Part 77 Approach Surface is trapezoidal in shape, and extends away from the runway along the centerline at a specific slope, as discussed in Section 1. The specific size and slope depends upon the aircraft served and visibility minimums of the runway end. The figures included in Appendix A for each runway end illustrate the Approach Surfaces, with the blue dots depict penetrations to the Approach Surface, orange dots are penetrations to the Transitional Surface, and the purple dots are penetrations to the TERPS Surfaces. These dots represent the most critical obstructions only, there are likely many more trees penetrations than shown by the dots. As such, in order to removal all obstruction per this alternative, comprehensive tree clearing would be necessary in all locations where these dots are present. In other words, the colored dots (blue and orange) indicate locations of obstructions to the Part 77 surfaces, which would be removed under the Full Obstruction Removal Alternative.

For Danielson Airport the approach surfaces to Runway 13 and Runway 31 each have a relatively steep 20:1 slope, resulting in relatively few penetrations. For the Runway 13 end, only a small number of penetrations were identified, all on undeveloped areas of land. For the Runway 31 end, a limited number of penetrations were identified on residential parcels, and at the Holy Cross Cemetery. The majority of obstructions at Danielson Airport, however, are within the transitional surfaces, and are mostly on airport property. For the airport as a whole, this alternative would result in approximately 85 acres of tree removal. Note that in 2012, CAA completed several acres of tree removal on-airport property (see below). That effort reduces the total clearing included in the build alternatives.



For tree removals on residential and other private parcels, permanent 'avigation' easements are typically required. Avigation easements refer a permanent conveyance of airspace, from a property owner to the airport, granting the airport the right to overfly the property and remove obstructions to a defined airspace surface. These easements involve appraisals, negotiation, and acquisition of the perpetual rights to remove existing tree obstructions and prevent future obstructions.

This Full Obstruction Removal Alternative would satisfy FAA requirements and improve safety of all operations at the airport, as well as on surrounding properties. However, as highlighted in the summary box, this alternative would include potentially significant impacts based on the large area involved, as well as the number of private properties affected. The cost and time involved to complete this alternative would be substantial, to the point that the successful completion is questionable due to the number of agreements needed with private parties.

To reduce potential environmental impacts of this Alternative, the tree clearing parameters would primarily include removal of all sizable trees, but retaining small trees and underbrush. Tree stumps would be left in place to minimize ground disturbance and potential erosion. This practice prevents or reduces impacts to wetlands, floodplains, and archeological resources. However, it is not a permanent solution as trees will eventually regrow. Nevertheless, this alternative may be considered to have a 20-year design life.

On residential properties, the removal parameters would be limited to selective removal of tall trees only, with stump grinding, top soil placement and seeding. Removal of branches, wood chips, and repair of damage to lawn areas would also be included. Small trees that are 20 feet or more below the surface would be left in place.

Overall, the tree removal approach and methods would vary based on site conditions, environmental sensitivity, and land use, with the detailed methodology determined during the permitting process. Removals are typically conducted during dryer periods of the years (i.e., autumn) or winter, when partly frozen ground reduces temporary construction impacts. Winter removals are also beneficial to reduce impacts to bat, bird, and plant species.



The following summary box highlights potential advantages and disadvantages of the Full Obstruction Removal Alternative.

Full Obstruction Removal Alternative	
Goal(s): This option removes all penetrations to the FAR Part 77 Approach and Transitional Surfaces, with obstruction lighting for the Horizontal and Conical Surfaces.	
Description: A comprehensive removal of obstructions to the inner airspace surfaces, including substantial areas and off-airport properties. This alternative provides maximum benefit to airport users and safety enhancement. Outer surfaces are protected with lighting during nighttime operations.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Clears or lights virtually all defined aeronautical surfaces</li> <li>• Satisfies federal design standards and assurances</li> <li>• Comprehensive removal of potential hazards to airport users</li> <li>• Improves safety for people and property on the ground surrounding the airport</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for impacts to wetlands (temporary or permanent)</li> <li>• Potential impacts to biological resources, habitats, or species of concern</li> <li>• Substantial coordination and negotiation needed with property owners</li> </ul>



	<ul style="list-style-type: none"> <li>• The need for numerous avigation easements may prevent successful completion of project and significantly extend the required schedule</li> <li>• High project costs</li> <li>• Successful completion is questionable</li> </ul>
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3.1.3 Modified Obstruction Removal Alternative

The Modified Obstruction Removal Alternative is intended to eliminate the most critical obstructions while substantially reducing the affected area and number of properties, and therefore potential environmental impacts. To accomplish this, the planned tree removals would focus on the penetrations to a less extensive airspace surface located on off-airport property; on-airport areas would continue to address the Part 77 Surfaces. Under this alternative, all areas of clearly would be limited selective removal, where the lower growing trees are left in place.

The FAA has recognized that full off-airport clearing of the Part 77 surfaces can be a considerable endeavor and is often impractical due to environmental impacts, costs, and property considerations. As such, the FAA Airport Design manual (Advisory Circular 150/5300-13A) has defined a different approach surface that may be used by airport sponsors to address the most critical obstructions and maintain an acceptable margin of safety.

For distinguishing purposes, this surface is often referred to as the Threshold Surface, as not to be confused with the Part 77 Approach Surface. The Threshold Surface is designed to protect use of the runway in both visual and instrument meteorological conditions. Like the Part 77 Approach Surface, it is trapezoidal in shape and extends outward and upward from the runway along the centerline at a specific slope. However, the Threshold Surface is generally smaller in size, and commence at the runway end, compared to the Part 77 Approach Surface, which reduces the size and/or density of the clearing area. The specific size and slope depends upon the aircraft served and visibility minimums of the runway end. Penetrations to the Threshold Surface are illustrated with a magenta (or pink) dots on the Figures. As most Threshold Surface penetrations are also Approach Surface Penetrations, these obstructions include blue dots with a magenta outline.



The figures in Appendix A illustrate the Modified Removal Alternative using shading. Yellow shading includes general tree clearing areas; green shading illustrates reduced or selective tree removal of individual tree obstructions identified during the design process – selective thinning. In other words, the hatching areas (green and yellow) indicate locations of obstructions to the threshold surfaces, which would be removed under the Modified Obstruction Removal Alternative. In some locations for preventative purposes, this alternative also recommends removals to some Part 77 surface penetrations as well. This selective thinning is use in locations were fewer obstructions are present and/or sensitive environmental conditions are anticipated (e.g., wetlands, streams).

This alternative would result in approximately 44 acres of selective removal with approximately .15% in the approach surface and the remainder in the transitional surface. Of the 44 acres recommended for selective

removal 32 acres are located on airport property. The mitigation of obstructions in the transitional surface is a lesser priority than the mitigation of obstructions within the approach surfaces. Transitional surface obstruction clearance should be considered after the approach surface obstructions are addressed or as the projects become warranted.

As with the Full Removal Alternative, the Modified Removal Alternative would employ the same removal methods and techniques to minimums impacts, and may include:

- Removal of all sizable trees, but retaining small trees and underbrush.
- Tree stumps would be left in place to minimize ground disturbance and potential erosion.
- On residential properties, removal of tall trees only, with stump grinding, top soil placement and seeding.
- Fall and/or winter removals may be employed to reduce impacts to bat and bird species, and reduce ground disturbance.
- Removals will be conducted in coordination with State and Federal regulatory agencies, and follow required techniques or procedures defined during the permitting process.

Unlike the Full Removal Alternative, the Modified Removal does not include obstruction lighting for the outer Horizontal and Conical Surface penetrations. Obstruction lighting is an added safety benefit, but requires additional property rights and access to remote locations.

The following summary box highlights potential advantages and disadvantages of the Modified Obstruction Removal Alternative.

Modified Obstruction Removal Alternative	
Goal(s): This option removes penetrations to the FAA Threshold Surface in off-airport locations (and to FAR Part 77 Approach and Transitional Surfaces on-airport)	
Description: A reduced removal alternative intended to clear the critical penetrations to the runway approaches to maintain operational safety, while minimizing the impact to off-airport properties and the natural environment.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Clears the critical obstructions</li> <li>• Satisfies federal design standards and assurances</li> <li>• Improves safety for people and property on the ground surrounding the airport</li> <li>• Reduces impacts to environmental resources</li> <li>• Reduces the number of affected property owners</li> <li>• Streamlines the project schedule and reduces costs</li> </ul>	<ul style="list-style-type: none"> <li>• Potential impacts to wetland, biological, habitat, or species of concern remain present</li> <li>• Easement are required with property owners</li> <li>• Less critical obstructions will remain</li> <li>• Outer Part 77 surfaces are not protected with obstruction lighting</li> </ul>

The CAA and FAA have identified this alternative as the most practical solution. This alternative balances the airport needs and safety while taking into account environmental considerations and minimizing both cost and private property disturbance. The review considered land use, access, ownership, wetlands, and general

environmental conditions. Detailed illustrations of the removal areas for this alternative have been prepared for each runway end. Each of these drawings are provided in Appendix A, and are referenced as necessary throughout the remainder of this document.

### 3.2 ALTERNATIVES CONSIDERED AND DISMISSED

This section includes a brief description of alternatives considered but dismissed because they were deemed infeasible.

- Removal of All Obstructions – Ideally all Part 77 obstructions would be removed, including those to the Horizontal and Conical Surfaces for the maximum safety benefit. However, due to the terrain surrounding the airport, private property involved, and potential environmental impacts, this alternative is not a realistic goal.
- Clear Cutting and Providing a Maintainable Surface – The two ‘build’ alternatives above remove tree obstructions; however, trees will eventually grow back. As an alternative, once trees are cut, the root balls could be pulled and the area graded and seeded. Thereafter the CAA would maintain the area as an open field with regular mowing or annual brush cutting. This option was eliminated from consideration in off-airport locations as grading the tree clearing areas would have a permanent impact to any wetlands, sensitive biological habitat, and recreational areas, and archeological resources. This alternative is also extremely costly.
- Displaced Thresholds – The displacement of a runway’s landing location (i.e., threshold) will reduce the amount of tree penetrations to the Threshold Surface. However, displaced thresholds reduce the landing length available for airport users. As such, this alternative was considered but dismissed. Reducing the available landing length would diminish the existing capability of the airport.
- Relocation of Runway – In some cases, a runway could be relocated or shifted horizontally to reduce penetrations. In the case of Danielson Runway 13-31, there does not appear to be a shifted or reoriented runway alignment that is feasible at the airport site. In addition, the cost for a runway relocation would likely far exceeded the cost for tree clearing.

### 3.3 PROPOSED ACTION

Based on the evaluation identified in this section, and review by CAA and FAA, the Modified Obstruction Removal Alternative has been chosen as the “Proposed Action” and “Preferred Alternative” for Danielson Airport. This determination is primarily related to the Full Removal Alternative being considered not practical nor feasible from an environmental and cost standpoint. The No Action Alternative is also not considered appropriate as it does not address the safety of airport users and does not satisfy FAA requirements or obligations.

The remainder of this Environmental Assessment document focuses on the evaluation of potential impacts of the Proposed Action, with tree removals illustrated by the yellow and green shading. The goal of the evaluation is to enable the FAA to determine if the impacts of the Proposed Action are substantial, or could be implemented without significant impact.



## 4.0 AFFECTED ENVIRONMENT

This chapter describes the environment that may be affected by the Obstruction Removal alternatives under consideration. The information provided in this chapter serves as the basis for the assessment of potential environmental, social, and economic impacts in Chapter 5.

Throughout Chapters 4 and 5, the discussion of potential impacts is in reference to the Preferred Alternative (i.e., the Proposed Action). It is assumed that the No Action alternatives, while undesirable, does not result in significant environmental impacts. It is also assumed that the Full Obstruction Removal Alternative will have greater impacts than the Preferred Alternative due to the more extensive area of tree removal and number of affected properties. As such, the remainder of this EA is focused on the potential impacts of the Proposed Action.

The sections below include the following:

- Land Use and Zoning
- Section 4(f) Lands
- Threatened and Endangered Species
- Wetlands



**4.1 LAND USE AND ZONING**

Danielson Airport is located in the Town of Killingly, Windham County, Connecticut (see Figure 1-1). The Airport is located in the Quinebaug River Valley (part of the Quinebaug Shetucket Heritage Corridor), and is bordered by the river to the west and south, and the Town of Brooklyn to the west. The Town of Killingly shares its eastern border with Rhode Island.

The area surrounding Danielson Airport primarily consists of open, wooded, residential, and institutional areas. A summary of nearby features is provided below.

- The Quinebaug River creates the western and southern borders of the airport property.
- Residential development is located immediately northwest and southeast of the airport property along Maryland and Rosedale Streets.
- The Harvard H. Ellis Technical High School is located immediately east of the airport property.
- Cemeteries, light industrial, and senior housing developments are located along Maple Street to the east.
- Large open and wooded areas provide a buffer between the airport property and surrounding areas (except to the east).



**Town of Killingly**

As per the Town of Killingly Zoning Regulations, Danielson Airport and the surrounding areas are zoned as Low Density Development. Permitted uses within this zone include but are not limited to single family residential dwellings, two family residential dwellings, churches, certain professional office home occupations, and agriculture. Additional uses are allowable by special permit.

**Town of Brooklyn**

The Town of Brooklyn is located across the Quinebaug River to the west of Danielson Airport in the Runway 13 approach. Zoning in this area of Brooklyn is Residential-Agricultural (R-A). RA allowable uses include single-family and duplex residential uses and agricultural uses. Certain additional uses may be allowed subject to site plan review including family day care homes, churches and conservation subdivisions.

## 4.2 SECTION 4(F) LANDS

Section 4(f) of the Department of Transportation (DOT) Act requires the approval of the Secretary of Transportation for any project that impacts publicly owned land such as a public park, recreation area, or wildlife refuge of national, state, or local significance or a historic site of national, state or local significance.

The Quinebaug River (just west of the Runway 13 approach), the Airport, and the Town are part of the Quinebaug and Shetucket Rivers Valley National Heritage Corridor. The National Heritage Corridor includes 35 towns, numerous villages and a total population of about 300,000. The federal government does not own or manage any of the land as it does in national parks. Instead, citizens, businesses, nonprofit cultural and environmental organizations, local and state governments, and the National Park Service work together to preserve and celebrate the region's cultural, historical and natural heritage. In this sense, the corridor does not qualify as a Section 4(f) resource.

Nevertheless, all locations of the selective thinning are within the National Heritage Corridor as the designated corridor includes all of the Towns of Killingly and Brooklyn. The tree removal locations closest to the river itself are location on Airport property, which includes nearly two miles of river frontage.

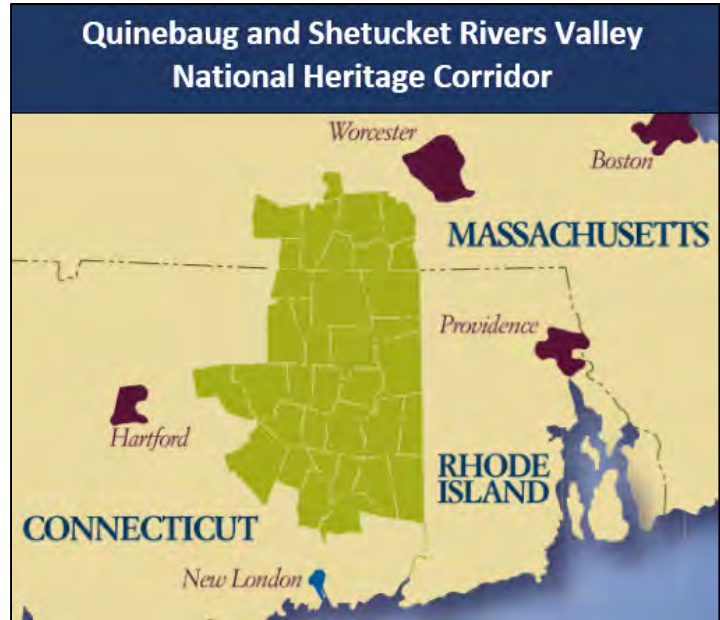
A review of the CT ECO mapping in the vicinity of the Airport does not delineate any publicly owned protected open space, or other potential Section 4(f) properties.

## 4.3 THREATENED AND ENDANGERED SPECIES

The habitat assessment for Danielson Airport involved agency coordination with the CTDEEP's Natural Diversity Database (NDDDB), screening through the United States Fish and Wildlife Service's (USFWS) Information Planning and Conservation System (IPaC), GIS screenings, and field investigations. Relevant agency coordination/correspondence is attached. Field investigations were carried out during the summer and fall of 2015.

**Fish:** The major waterbody within the project area is the Quinebaug River. This watercourse supports both a warmwater and coldwater fishery. Important coldwater fish species reported to occur in the system include Black-nosed Dace (*Rhinichthys atratulus*), fallfish (*Semotilus corporalis*) and Common Shiner (*Luxilus cornutus*), which are all important forage fish to piscivorous wildlife. Important warmwater fisheries include White Sucker (*Catostomus commersoni*), American Eel (*Anguilla rostrata*), Large-mouth Bass (*Micropterus salmoides*), Common Shiner (*Luxilus cornutus*), and Small-mouth Bass (*Micropterus dolomieu*) (Hagstrom et al., 1996).

**Wildlife:** Wildlife within the project area is diverse, representative of multiple taxa, and include a number of species identified as species of "Greatest Conservation Need" by the CTDEEP in the Comprehensive Connecticut



Wildlife Conservation Strategy (CTDEEP, 2005). Various herpetofauna (reptiles and amphibians) are known or expected to occur within the project area.

Between 138 – 152 bird species are reported from area hotspots to the north (Connecticut Audubon Society Bafflin Preserve in Pomfret) and south of the site (Quinebaug Fish Hatchery in Plainfield) by area birders <http://ebird.org/ebird/hotspots>. This list includes species representative of many taxonomic orders and families and is indicative of the species that would be expected to be found in similar habitats within the project area which is also along the Quinebaug River and contains varied habitat types. It includes a variety of species considered to be of Greatest Conservation Need by the CTDEEP (2005), and a variety of migratory species whose distributional ranges overlap the project area, the protection of which falls under the jurisdiction of the USFWS.

Old Field/Shrubland Habitat northwest of Runway 31



Opossum (*Didelphis virginiana*), Eastern Cottontail (*Sylvilagus floridanus*), and a variety of rodents and arboreal-roosting bats.

The most abundant mammals observed within the project area are Gray Squirrel (*Sciurus carolinensis*), Red Squirrel (*Tamiasciurus hudsonicus*), and Eastern Chipmunk (*Tamias striatus*). Signs of White-tailed Deer (*Odocoileus virginianus*), including scat, tracks, and bedding areas in tall grass, were also observed during the site visit. Signs of Beaver (*Castor canadensis*) are evident along the Quinebaug River which also likely hosts River Otter (*Lontra canadensis*), Mink (*Mustella vison*), and other mustelids. Burrows of Woodchuck (*Marmota monax*) and Red Fox (*Vulpes vulpes*) were also encountered on or adjacent to the Airport. Other abundant mammals likely to occur on and near the Danielson Airport include Raccoon (*Procyon lotor*),



Tall White Pine Stand of Runway 31

**Plants:** The project area is characterized by a temperate deciduous forest dominated by tall growing broadleaf trees that often grow to form dense continuous-canopy stands or forests. Lower layers of small trees and shrubs are weakly developed in some areas and dense in others. The most abundant forest type that occurs within the project area includes mixed deciduous hardwoods, Appalachian oak, and pine-oak associations. Non-forested habitats include grasslands, old field / shrubland habitats, lawn areas, and various miscellaneous ruderal habitats. These habitats, their characteristic vegetation, location in the project area and characteristic wildlife species of conservation concern are provided in Table 7 below. Species of conservation concern are further discussed below.

**Rare Species:** A review of CTDEEP Natural Diversity Database (NDDDB) Geographic Information System (GIS) mapping revealed no mapped locations of rare breeding species sites on or near the airport. A Broad-winged Hawk (*Buteo platypterus*) was noted flying out of a mixed deciduous and coniferous woodland stand on the hillside to the northeast of the airport access road during field reconnaissance



conducted for this project on the 7<sup>th</sup> of August, 2015. This species is listed as Special Concern by the CTDEEP (CTDEEP, 2015a).

The USFWS Information for Planning and Conservation (IPaC) Online Screening Tool was referenced to obtain information on species listed on the federal Endangered Species Act. An IPaC report generated for this project (USFWS IPaC, 2015) identified one rare mammal species - the Northern Long-eared Bat (*Myotis septentrionalis*) - and 15 migratory bird species with distributional ranges that included the project area. A copy of the IPaC report is provided in Appendix C.

**Table 7. Existing Habitats, Associated Species of Conservation Concern and their Respective State and Federal Status**

Habitat	Characteristic Vegetation	Location in the Project Area	Species of Conservation Concern	CT Status (CTDEEP 2015a, 2015b)	Federal Status
Deciduous Hardwood Mesophytic Forests:	Sugar Maple, Tulip, Black Birch, White Ash, Red Maple. Characteristic herbs: Canada Mayflower, Christmas Fern, Interrupted Fern; and Wood Fern. Occur as inclusions within mixed or coniferous forest/woodland	North of Runway 13; Parcel 22	Wood Thrush	GCN – Most Important	Conservation Concern
			Worm-eating Warbler	GCN – Very Important	Conservation Concern
Appalachian Oak Forest	White Oak and Northern Red Oak, Black Birch, Black Cherry, Sassafras, and various hickories; Maple-leaved Viburnum, Lowbush Blueberry, huckleberry.	Parcel 22 and 23	Worm-eating Warbler	GCN – Very Important	Conservation Concern
Mixed Deciduous/ Coniferous Forests and Woodlands	White Pine with Northern Red Oak, Black Oak, and various hickories. Eastern Hemlock is present at some locales; heath shrubs typically dominate the shrub layer.	Northeast of Runway 13; Southwest of Runway 31	Prairie Warbler	GCN – Most Important	Conservation Concern
			Fox Sparrow (Spring)	N/A	Conservation Concern
Red Maple Forest/ Swamps	Red Maple is dominant; Yellow Birch & American Elm are also present. Shrub layer may contain Winterberry, Sweet Pepperbush, Spicebush, Silky Dogwood, alder. Herbs typically include Skunk Cabbage, Jewelweed, Tussock Sedge, False Nettle, Royal Fern and Cinnamon Fern	Northeast of Runway 13 and Southwest of Runway 13	Rusty Blackbird (fall and winter)	N/A	Conservation Concern
			Canada Warbler (mostly Spring) in swamps with dense shrub layers	GCN – Very Important	Conservation Concern
River Floodplain	Eastern Cottonwood, Alder	Northwest of Runway 13	American Bittern	Endangered GCN – Very Important	Conservation Concern

**Table 7. Existing Habitats, Associated Species of Conservation Concern and their Respective State and Federal Status**

Habitat	Characteristic Vegetation	Location in the Project Area	Species of Conservation Concern	CT Status (CTDEEP 2015a, 2015b)	Federal Status
			Least Bittern	Threatened GCN – Very Important	Conservation Concern
White Pine Forest/ Stand	White Pine in the tree layer; Sugar Maple, Black Cherry, and Gray Birch often in a Sapling layer, Canada Mayflower, Wild Sarsaparilla in herbaceous layer,	Parcel 1, southwest of Runway 31 North of Runway 13; west of Runway 13			
Shrubland/Old Field	Gray Birch, Sassafras, Pitch Pine in the sapling layer; Sweet Fern, Staghorn Sumac and various brambles often interspersed with non-native invasive shrubs.	Northwest of Runway 13; South West of Runway 31; Parcel 1	Blue-winged Warbler	GCN – Most Important	Conservation Concern
			Black-billed Cuckoo	GCN – Very Important	Conservation Concern
			Fox Sparrow (Winter)	N/A	Conservation Concern
Grasslands	Little Bluestem and other warm-season grasses, interspersed with various forbs such as goldenrods, asters, Common Mullein, Evening Primrose, Bedstraw, English Plantain, Round-headed Bush-clover, Queen Anne’s Lace, etc.	North of Runway 13; West of Runway 31; Parcel 1	Upland Sandpiper	Endangered GCN – Most Important	Conservation Concern
			Short-eared Owl (wintering populations)	Threatened (wintering) GCN – Important	Conservation Concern
Miscellaneous (Ruderal) Habitats	Lawn (turf) grasses, Sheep sorrel, cinquefoil, English Plantain, White Clover, Dandelion, various landscape plantings, naturalized & non-native, invasive weeds	Parcels 1-16,	none		
Quinebaug River	Open water	Northwest of Runway 13	Pied-billed Grebe	Endangered GCN – Most Important	Conservation Concern
			Bald Eagle	Threatened GCN – Important	Conservation Concern

GCN = Greatest Conservation Need as identified in the State Wildlife Action Plan (CTDEEP, 2015b)

N/A = Not Applicable

The species that have been identified by CTDEEP as being documented within the project area and any required mitigation is presented and discussed in Section 5.7 Fish, Wildlife and Plants.

## 4.4 WETLANDS

To understand the extent of wetland resources within potential obstruction removal impact areas, a review of National Wetland Inventory (NWI) maps and a field investigation was conducted. The objective of the field investigation was to determine the approximate locations, extent, and connectivity of the wetlands and associated watercourses on those parcels identified for obstruction removal (tree cutting). A basic understanding of the wetlands and their position within the greater landscape helps to give a better insight into the potential habitat impacts that may occur as a result of the obstruction removal project.

While the wetlands within the project area were not formally delineated, observations made in the field by a team of wetland scientists essentially encompassed the investigation of the criteria typically required for a formal delineation. These criteria for state and federal wetlands include hydric soil conditions, hydrophytic vegetation, and evidence of hydrology. Connecticut inland wetland boundaries are determined by the limit of any of the soil types designated as poorly drained, very poorly drained, alluvial, and flood plain by the National Cooperative Soils Survey.

Danielson Airport is situated on an expansive plain surrounded by forested land to the east and west, the Quinebaug River and associated floodplain to the north, residential property to the southwest and a high school to the southeast. In general, forested wetlands dominated by red maples (*Acer rubrum*) and northern spice bush (*Lindera benzoin*) are the most abundant wetland type in the vicinity of the airport. The largest contiguous wetlands are located to the north of the airport property in association with the Quinebaug River and riverine (river) and vegetated bordering (palustrine) wetland systems.

On the airport property there are various small vegetated wetlands that have formed within concave hillsides within the forested areas to the east and west of Runway 13. The majority of these wetlands are Palustrine Forested Broad-leaved deciduous seasonally saturated systems with adjacent scrub shrub wetland areas, the latter cover type being created by past vegetation clearing.

Off airport property, but within the designated obstruction removal limits, few private parcels have been identified as having potential for wetland impacts associated with this project. Most areas within the approach surface immediately northwest of Runway 13 are open upland agricultural fields. Some of the fields are separated by wooded windrows. Further northwest continuing away from the Runway 13 terminus, the approach surface crosses an electric transmission line right-of-way (ROW). Still further northwest beyond the ROW and within the limits of the approach surface, the land cover includes a forest patch where selective tree removal of approach surface obstructions is proposed on portions of Parcels 22 and 23. This forest consists of mature Appalachian oak/hickory species and is bisected by an intermittent watercourse.

Please refer to Appendix A for corresponding maps.

Table 8: National Wetlands Inventory Wetland Cover Types on and adjacent to Danielson Airport in areas of Proposed Tree Cutting		
Wetlands Cover Types and NWI Classification	Location	Major Wetland Plant Associations / Types
Interspersed Palustrine Scrub/shrub (PSS) and Emergent Marsh (PEM) Wetland	Southwest and Southeast of Runway 13 (outside of tree removal areas)	Purple Loosestrife, Blue Vervain, Boneset, Tussock Sedge, Lurid Sedge, and Woolgrass interspersed with Barberry, Multiflora Rose, Hardhack, Winterberry and Buckthorn
Palustrine Forested Wetlands (PFO) - Red Maple Swamp	Southeast and Southwest of Runway 13	Red Maple, American Elm, Winterberry, Skunk Cabbage, Jewelweed, Cinnamon Fern, Marsh Fern, Tussock Sedge
Quinebaug River (R2UBHh)	Northeast of Runway 27	Riparian zone trees such as American Sycamore, Eastern Cottonwood

## 5.0 ENVIRONMENTAL CONSEQUENCES

This chapter describes the potential environmental, social, and economic impacts associated with the Preferred Alternative (i.e. Build Alternative). The analysis in this chapter was conducted in accordance with FAA Order 5050.4B “*National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*,” FAA Order 1050.1E “*Environmental Impacts: Policies and Procedures*,” and applicable federal and state environmental regulations. Based on the information in this chapter, coordination with federal and state agencies, and review of public comments, the FAA will determine if the Preferred Alternative would involve significant impacts. The FAA will also ensure that the document presents a full, accurate, and fair assessment of the environmental consequences of the proposed action.

Consistent with the FAA Orders 5050.4B and 1050.1E the following impact categories are addressed:

- Air Quality
- Coastal Resources
- Compatible Land Use
- Construction Impacts
- Department of Transportation Act: Section 4(f)
- Farmland
- Fish, Wildlife, and Plants
- Floodplains
- Hazardous Materials, Pollution Prevention, and Solid Waste
- Historical, Architectural, Archeological, and Cultural Resources
- Light Emissions and Visual
- Natural Resources and Energy Supply
- Noise
- Secondary (Induced)
- Socioeconomic Impacts, Environmental Justice, and Children’s Environmental Health and Safety Risks
- Water Quality
- Wetlands
- Wild and Scenic Rivers
- Cumulative Impacts

Anticipated permit requirements and an impact summary are provided at the end of the chapter.

### 5.1 AIR QUALITY

The Clean Air Act (CAA) Amendments of 1990 authorized the U.S. Environmental Protection Agency (EPA) to establish standards, known as the National Ambient Air Quality Standards (NAAQS), which are considered harmful to the public and the environment.

The Clean Air Act established two national air quality standards, including Primary and Secondary Standards. Primary Standards were established to set limits on harmful pollutants to protect the public and sensitive receptors (asthmatics, children and the elderly). Secondary Standards were set to protect the public welfare by accounting for the effects of air pollution on the public welfare, which includes protection against impaired visibility, damage to animals, soil, vegetation, crops, buildings, and other aspects of the general welfare.

The EPA has established NAAQS for the following six “criteria air pollutants” in order to protect the health and welfare of the general public. These pollutants are listed below.

- Ozone (O<sub>3</sub>)
- Carbon monoxide (CO)
- Particulates (PM-10)
- Sulfur dioxide (SO<sub>2</sub>)
- Nitrogen dioxide (NO<sub>2</sub>)
- Lead (Pb)

According to the Connecticut Department of Energy & Environmental Protection (CTDEEP), Windham County is currently in attainment for all criteria air pollutants with the exception of 8-hour Ozone. Windham County is part of the 5-county Greater Connecticut Area and is classified as a marginal Nonattainment Area and subject to planning and emission reduction requirements as specified in the Clean Air Act.

Section 176(c) of the CAA as amended in 1990, requires that Federal actions conform to the appropriate Federal or State air quality plans in order to attain the CAA’s air quality goals. Conformity is defined as conformity to the implementation plan’s purpose of eliminate of recusing the severity and number of violations of the NAAQS and achieving expeditious attainment of such standards, and that such Federal activities will not:

- (1) Cause or contribute to any new violation of any standard in any area
- (2) Increase the frequency or severity of any existing violation of any standard in any area
- (3) Delay timely attainment of any standard of any required interim emission reductions or other milestones in any area.<sup>1</sup>

The obstruction removal will improve safety, but will not change the operating characteristics of the airport. There will be no changes in activity levels, aircraft types or other facilities and as such there will be no changes in air quality as a result of this work. Thus, the three criteria above area satisfied. No impacts are anticipated and therefore no further evaluation is be needed.

## 5.2 COASTAL RESOURCES

The Connecticut DEP administers the Connecticut Management Program, enacted in 1980 to protect coastal resources, including restoration of coastal habitat, improve public access, promote harbor management, and regulate work within tidal, coastal and navigable waters.

The Danielson Airport is not located within a designated Coastal Zone, and is not within the jurisdiction of the Coastal Zone Management Program. As a result there will be no impact to a designated coastal zone or coastal barrier; therefore no additional evaluation is necessary.

## 5.3 COMPATIBLE LAND USE

The Airport and its environs is zoned Low Density. To the west of Runway 13 is a small area identified on the zoning map as 100 Year Flood associated with the Quinebaug River. Further west is the Town of Brooklyn; zoned Residential-Agricultural (R-A) in the area of selective removal. Several areas on the airport property (Appendix A) both north and south of Runway 13-31 have been identified for the selective removal of trees.

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<sup>1</sup> U.S. Department of Transportation, FAA Order 1050.1E, Appendix A, Section 2.1f

### Runway 13 Approach

General land use consists within the approach includes agricultural and undeveloped lands. Residential structures are limited in this area. A small area of Parcel 22 has been identified for the selective removal of trees and is depicted in Appendix A. This parcel includes both forested areas and areas used for agriculture. The selective removal of potential obstructions will not impact land use or zoning in this area.

### Runway 31 Approach

Land use within the Runway 31 Approach Surface is a combination of single family residential, multifamily residential, and cemetery. Five Mile Pond borders the cemetery to the south. Selective removal areas include the adjacent residential areas identified on Appendix A as parcels 3 through 16, with the highest priority for selective removal on Parcels 3-5 and 12-14 on Maryland and Rosedale Streets. The removal will not impact the zoning or land use of any of the surrounding parcels.

Similar to the discussion above, avigation easements would be necessary, with a payment to the individual property owners (fair-market-value based on appraisals) to enable tree obstruction removal. On individual residential lots, selected trees are removed by a landscaper with the area restored and seeded. Replacement trees are not provided, but mitigation is provided via the payment to property owner for the easement.

The removal of trees will not impact the existing use of these parcels. The project does not alter airport operations or flight patterns and therefore will not have any impacts on adjacent land use or zoning.

### Runway 13-31

Lands adjacent to the runway identified for selective tree removal are located well within the airport boundary. These selective removals will not result in any impact to the zoning or land use of any of the surrounding parcels

## 5.4 CONSTRUCTION IMPACTS

Potential construction impacts from the removal of trees are not expected to be significant. Tree removal or installation activities may produce temporary environmental disturbances, such as noise from equipment, air quality impacts from dust, minor soil erosion and sedimentation, & minor disruption of local traffic patterns. These impacts can be mitigated through careful planning and consideration, as well as quality construction supervision.

### 5.4.1 Construction Noise

As with any construction project, the use of construction equipment and construction traffic will temporarily generates noise. All construction equipment and vehicles will be properly maintained, tuned to minimize the potential for noise. Upon project completion, ambient noise levels will return to pre-existing conditions.



### 5.4.2 Air Quality

Air quality impacts during construction would be limited to short-term increases in fugitive dust, particulates, and localized pollutant emissions from construction vehicles and equipment during tree removal. As stated above, all construction equipment should be properly maintained and outfitted with emission reducing exhaust equipment. The work involves the selective removing of trees that have been identified as obstructions; other vegetation and ground covers will not be removed, protecting the soil from erosion and thereby limiting the potential for increases in fugitive dust. Adherence to the soil and erosion control plan as required in the Stormwater Pollution Protection Plan (SWPPP) will further mitigate any potential impacts.

### 5.4.3 Sedimentation & Erosion

The potential for erosion during the selective removal of obstructions is minimal as small trees and ground covers will remain and no new impervious surfaces will be created as part of construction operations. Adherence to the soil and erosion control plan as required in the SWPPP will further mitigate any potential impacts.

### 5.4.4 Traffic

Construction vehicles will enter and exit local roads throughout the duration of construction. Impacts to traffic patterns will be limited as all construction activities will be performed beyond the limits of the public roadways. In order to limit impacts related to construction impacts the community will be notified of the start date of this project and alert them to potential construction traffic.



## 5.5 DEPARTMENT OF TRANSPORTATION ACT: SECTION 4(f) LANDS

Section 4(f) of the Department of Transportation (DOT) Act of 1966 states that the Federal Highway Administration and other DOT agencies cannot approve any program or project that requires the use of land from publicly owned recreation areas, parks, wildlife and waterfowl refuges, or public and private historical sites unless there is a determination that there is no feasible and prudent alternative, or the action includes all possible planning to minimize harm to the property resulting from use.





As discussed in above, the Airport, and all selective removal areas, are within the Quinebaug and Shetucket Rivers Valley National Heritage Corridor. The State and federal governments do not own or manage the associated land as the corridor is not a traditional park. Citizens, businesses, nonprofit cultural and environmental organizations, local and state governments, and the National Park Service work together to preserve and celebrate the region's cultural, historical and natural heritage. Thus, the corridor is not a Section 4(f) resource; nevertheless, potential impacts are considered herein.

As the selective tree removal does not include any development and retains the property as wooded/forested, the proposed action is consistent with the preservation and recreations goals of the National Heritage Corridor. The large undeveloped locations on the airport property, and the approximate 10,000 linear feet of Quinebaug River frontage, will remain unchanged under the proposed action. In off-airport removal areas to the west, the area is surrounded by undeveloped forested areas and some agricultural fields. Upon completion of the selective removal, the use and access to the National Heritage Corridor will remain

unchanged.

While no Section 4(f) resource impacts are anticipated, coordination with the Connecticut Department of Energy and Environmental Protection's (CTDEEP) will occur prior to tree removal activities.

## 5.6 FARMLAND

The Farmland Protection Act (FPA) of 1981 authorizes the U.S. Department of Agriculture to develop criteria for identifying the effects of federal programs on the conversion of farmland to non-agricultural uses. The prime and unique farmland regulations require that the U.S. Department of Agriculture determine whether land affected by any proposed action is prime and unique farmland. If the proposed project involves the acquisition of farmland that would be converted to non-agricultural use, it must be determined whether any of that land is protected by the FPA.

The Natural Resource Conservation Service (NRCS), within the United States Department of Agriculture (USDA) has established guidelines under the Farmland Protection Policy Act (FPPA) for federal activities that involve directly undertaking, financing, or approving a project that would impact farmland soils. The guidelines recognize that the quality of farmland varies based on soil conditions, and places higher value on soils with high productivity potential. To preserve these highly productive soils, the NRCS classifies soil types as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. The NRCS requires that soils in these categories be given proper consideration before they are converted to non-farming uses by federal programs. The NRCS policy and procedures on prime and unique farmland are published in the Federal Register (Volume 43, No. 21, January 31, 1978).

According to Web Soil Survey from the NRCS, the following soil types identified as prime farmland or farmland of statewide importance mapped in the vicinity of the potential affected parcels include:

Prime Farmland:

- Merrimac fine sandy loam, 0-3% slopes (34A)

Farmland of Statewide Importance:

- Hinkley loamy sand, 3-15% slopes (38C)

These soils are generally located in areas that are forested or developed for non-agricultural uses.

The implementation of the appropriate soil erosion controls mitigates the potential for impacts to farmland soils from tree removal activities. The tree removal locations do not do not contain any active farmland areas and therefore no adverse effects or significant impacts are expected to occur. Furthermore, the project does not include any development activities, new impervious areas, or acquisition of property

### 5.7 FISH, WILDLIFE, and PLANTS

Upland forested habitat would be directly impacted by the proposed tree clearing activity (See Forest Wetland habitat discussion in Section 5.17 below). Portions of forest or woodland areas located within the project area ranging in size from a few acres to approximately 85 acres could be impacted by the proposed tree removal on a portion of the existing forest block. Un-fragmented forest cover typically provides habitat for successful breeding populations of “area-sensitive” species. Generally speaking, clear-cutting and other timber treatments that would result in the disruption of contiguous canopy coverage in these habitats may render such habitat unsuitable for those species, many of which are species of state and federal conservation concern. Avifauna are the most prevalent group of vertebrate wildlife occurring in the obstruction removal areas, with some species requiring large tracks of undisturbed forest for successful breeding.

Un-fragmented forest blocks larger than 500 acres generally have higher success rates than do the smaller blocks for forest interior breeding species. These large forested habitat blocks tend to have higher successful breeding rates of forest interior avifaunal populations and are also important for other larger vertebrate organisms as well. Habitat blocks between 125 and 500 acres in size are considered to have less but still fair to important value for forest interior avifauna, especially if the surrounding landscape is not intensely developed. Forest blocks smaller than 125 acres can be considered to have poor to fair value for supporting populations of forest interior species. Most of the forest blocks at Danielson Airport that lie within the obstruction removal area are generally smaller than

125 acres. All but one falls within the range of approximately 5 to 100 acres. One block to the northwest of Runway 13 is 200+ acres, but only a very small patch at the southeastern limit of this forest block was identified for selective tree removal.



Among the USFWS list of species of conservation concern identified in the IPAC report, the Northern Long-eared Bat, Wood Thrush and Worm-eating Warbler are considered forest species that could be negatively impacted by the loss of forest cover should these species occur in the forest within the obstructions removal area. So too is the Broad-winged Hawk – which was observed along the eastern boundary of the airport on August 7<sup>th</sup> 2015 during a site reconnaissance associated with this project.

A preliminary estimate of Impact to contiguous canopy coverage (either through potential clear cut or patch cut treatments) within existing forest habitat block at each runway as a result of the proposed action is as follows:

- Runway 13 – Approximately 8 acres of selective removal out of an existing 85-acre contiguous forest block, selective removal of trees from smaller blocks separated by agricultural areas
- Runway 31 – Individual tree removals within a few acre area in a residential area and cemetery

Regardless of the limited value of the forests to interior avifauna, the forested habitat blocks at Danielson Airport that lie within the obstruction removal areas do provide wildlife habitat to edge species and species that do not require large contiguous tracts of forest interior (habitat “generalists”). These forest blocks also serve other ecological functions and values as well which may include but may not necessarily be limited to the following:

- Soil generation
- Soil and bank stabilization
- Temperature moderation
- Wind reduction
- Water retention
- Nutrient and production export
- Pollution retention
- Aesthetic value

The loss of a majority of these forest ecological functions and values would be avoided or minimized by employing best management practices (BMPs) for tree

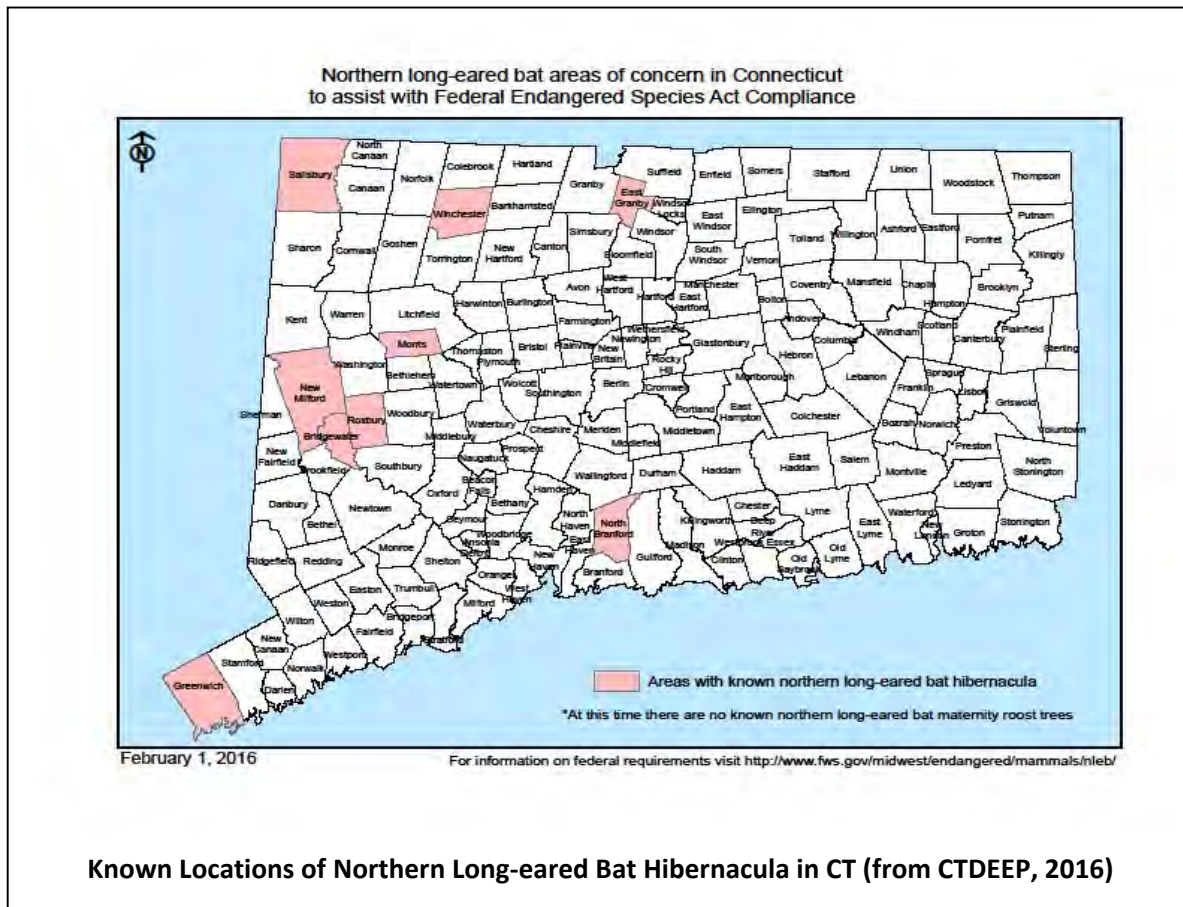


cutting, erosion and sedimentation control, seasonal restrictions, and by felling timber in place with no or minimal harvest. No large-scale clearing or grubbing across the entire obstruction removal area is included as part of the proposed action. Therefore, soil erosion is not expected to be a major issue as large areas of bare soil will not be generated by this project, and consequently, exposed to the erosive forces of wind and water. Implementation of erosion and sedimentation control BMPs would further reduce the risk of soil loss from the occasional areas where limited amounts of soil disturbance might occur from equipment access.

Removal of the mature tree cover from within the obstruction removal area at Danielson Airport in the manner discussed above would actually serve to improve the habitat for the majority of the species of conservation concern identified by the CTDEEP and USFWS as having potential to occur within the project area. Many of the species listed by these agencies are shrubland or grassland species and, therefore, forest interiors do not meet their habitat requirements. Upland species that would benefit from mature tree canopy removal and the subsequent and expected development of a robust shrub layer include the New England Cottontail, the Black-

billed Cuckoo, Prairie Warbler, Blue-winged Warbler, and Fox Sparrow. Wetland species that would utilize palustrine scrub/shrub cover type include the Rusty Blackbird and Canada Warbler.

The USFWS IPaC screening report identified the federally threatened Northern Long-eared Bat as having a distributional range that includes the project area. Tree clearing in general within the range of the Northern Long-eared Bat is a potential concern for the conservation of this species. However, pursuant to the Final 4(d) Special Rule under authority of the Endangered Species Act the USFWS would not require surveys to determine the presence of Northern Long-eared Bat if the project site does not occur within ¼ mile from a known hibernaculum or contain a maternity roost site. The USFWS defers to the state wildlife resource agencies for information on hibernacula and maternity site locations. The CT DEEP NDDDB did not identify Northern Long-eared Bat as occurring within the project area. Based upon this information, it can be concluded that the proposed action would result in a “not likely to effect” determination for both the Northern Long-eared Bat and Indiana Bat. The sponsoring federal agency must request USFWS concurrence with this conclusion via a hard copy letter for documentation to accompany subsequent project permit applications.



Pursuant to the Migratory Bird Treaty Act and the Bald and Golden Eagles Protection Act, any activity which results in the “take” of migratory birds or eagles is prohibited unless authorized by the USFWS. According to the USFWS IPAC report generated for the project area, there are no provisions for allowing the take of migratory birds that are unintentionally killed or injured. Therefore, the federal agency responsible for the proposed action must analyze potential impacts to these bird species and implement appropriate conservation measures for all project activities. However, the Proposed Action is not likely to have any negative effects on the relevant species identified

by the USFWS if work is conducted outside of the breeding season. Since the breeding season for the Bald Eagle is known to be as early in the calendar year as February, additional measures pursuant to federal guidelines for the protection of eagles would likely be warranted.

A typical requisite measure pursuant to these guidelines is to maintain a 660 foot no disturbance zone around active nesting eagles. With the above mitigation measures enacted, no takes of these species are anticipated.

**Conclusion:** Direct impacts to forest/woodland dependent species of conservation concern identified by state and federal agencies can likely be avoided through restriction of tree removal activities to seasonal periods when these species are not present. In order to remove trees during the breeding season, a biological survey would likely be needed to ascertain the forest/woodland dependent species that may occur within the forest blocks subject to tree cutting (i.e., Wood Thrush, Worm-eating Warbler, and Broad-winged Hawk). The parcels of issue include the airport property as well as Parcels 1 and 22. The goal of a biological survey would be to assess the potential presence of the forest conservation concern and listed species on those parcels during the breeding season. If those species were found, then follow-on agency consultation may be required to address impact to the habitats of these species, and mitigation may be needed.



As this process can be time consuming, CAA's preferred approach will likely include tree removal during winter conditions, avoiding the growing and breeding season. As discussed, under the wetland evaluation, winter cutting is typically the preferred approach to minimize potential impacts, and may be employed by CAA. Based on other airport obstruction removal projects, direct impact to these species may be avoided via use of seasonal restrictions (e.g., no tree cutting from April 1 through September 30 when these species are known to breed in New England, or other period as determine by regulatory agencies), or in the case of nesting Bald Eagles, no cutting within 660 feet of an active eagle nest. As such, significant impacts to critical species is not anticipated. This conclusion will be reviewed by USFWS and CT DEEP to determine if biological surveys and potential mitigation are necessary. The actual schedule for tree removals will be determined during the permitting process.

## 5.8 FLOODPLAINS

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRMs) that depict 100-year and 500-year floodplains in many areas throughout the country. A 100-year floodplain is an area that has a 1% chance of being flooded in any given year (Zone A). A 500-year floodplain is an area that has a 0.2% chance of being flooded in a given year (Zone B).

According to the applicable FIRM, (Community Panels 090136 0012B and 0901640003A, Effective Date January 3, 1985 and Community Panel 090169001A dated November 1, 1984), Danielson Airport and the affected parcels are located in Zone C which represents areas determined to be outside the 500 year floodplain. As there are no tree removal areas identified within the 100 year or 500 year floodplain, no anticipated impacts to the floodplain as a result of this project.

While the removal of trees does not impact flooding levels, it may increase runoff rates. This will be addressed through stormwater management techniques outlined in the Storm Water Pollution Prevention Plan (SWPPP) that will be required prior to the removal project.

## 5.9 HAZARDOUS MATERIALS, POLLUTION PREVENTION, AND SOLID WASTE

The scope of this task consisted of a database review of the relevant State and Federal environmental regulatory agency records and a visual field inspection for potential hazardous materials located within the project areas. Tree clearing activities do not create hazardous materials concerns in and of themselves; however it is important to identify any potential hazardous materials which may be encountered during tree clearing activities and require specialized management. A more detailed Environmental Site Assessment would be conducted should hazardous materials be observed and/or encountered.

The results of the data reviews and site inspection are summarized in the following sections.

### 5.9.1 Database Review

The database review consisted of a search for records in the applicable State and Federal environmental regulatory agency records for each property located in the tree clearing areas. Special attention was given to those databases for hazardous materials spills and dumping, as these are the most likely to impact tree clearing activities.

None of the identified properties where tree removal activities are to take place were listed by any of the reviewed regulatory agency databases.

### 5.9.2 Site Reconnaissance

The field inspection was conducted on July 29, 2015 and consisted of a detailed visual inspection of the areas of concern.

#### On-site Tree Clearing Areas

Tree clearing areas on Danielson Airport property are located along each side of Runways 13-31. These areas are indicated for selective removal of trees. Several features of note were observed on airport property:

- A former police shooting range was located south of Runways 13-31.
- Several old road guardrails were observed in an area that was historically used by the Department of Transportation as a stockpile area southwest of Runways 13-31.
- A very limited amount of dumping was noted, but was of a non-hazardous nature.
- Several old signposts and a concrete pile were noted north of Runways 13-31 near the administrative building.

No hazardous materials were observed on airport property.



### Off-site Tree Clearing Areas

Areas designated for selective removal of trees are located on properties both east and west of the airport. To the east of the airport are multiply properties where selective tree removal may take place. Two of these properties are cemeteries. The remainder of the properties were private residences. No hazardous materials were observed on any of these properties.

One area of selective tree removal were identified on the west side of the airport across the Quinebaug River, in a wooded location several agricultural fields. No hazardous materials were observed in this area.

**Conclusion:** No potential hazardous materials or concerns were identified by the regulatory database review or observed during the visual inspection. In summary, at this time, there are no known hazardous materials in the areas of concern at Danielson Airport.

It should be noted that the database searches can only reveal reported hazardous materials concerns. Unreported spills or dumping of hazardous materials will not appear in these database searches. The visual field inspection was somewhat limited due to the large areas involved and the dense undergrowth encountered in some locations. Additionally, only hazardous materials present in the areas of concern at the time of the site inspection are discussed. Future dumping of hazardous materials at these sites may occur and care should be exercised if unidentified potential hazardous materials are encountered during tree clearing operations.

## 5.10 HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act requires Federal agencies to review the potential effects of a proposed project on cultural resources. Through consultation agencies identify historic properties within or adjacent to the project area and find ways to avoid, minimize or mitigate the potential effects on the identified resource while accommodating the proposed project.

Tree removal may generally include clearing without grubbing unless directed otherwise by regulatory agencies. The Proposed Action does not include impacts or removal of any buildings or structures. Access would be provided by unimproved routes without grading or paving. It is anticipated that no significant soil disturbance will occur and as a result impacts to cultural resources will be avoided.

To confirm this, correspondence describing the project including mapping of potential affected parcels was submitted to the Connecticut State Historic Preservation Office (SHPO) for review. Their review indicated that although there are archeological sites or historic resources in close proximity of affected parcels, SHPO recognizes that tree removal can be accomplished with minimal ground disturbance without clearing and grubbing. In addition, the FAA sent consultation letters to the Mohegan and Mashantucket Pequot Tribal Nations at the commencement of the study, regarding the proposed action and any potential concerns. No concerns were received from the Tribal Nations. See Appendix B.

## 5.11 LIGHT EMISSIONS AND VISUAL

### 5.11.1 Light Emissions

The removal of tree obstructions will not result in light emissions. All tree removal operations will take place during daylight hours therefore no impacts related to light emissions are anticipated.

### 5.11.2 Visual Impacts

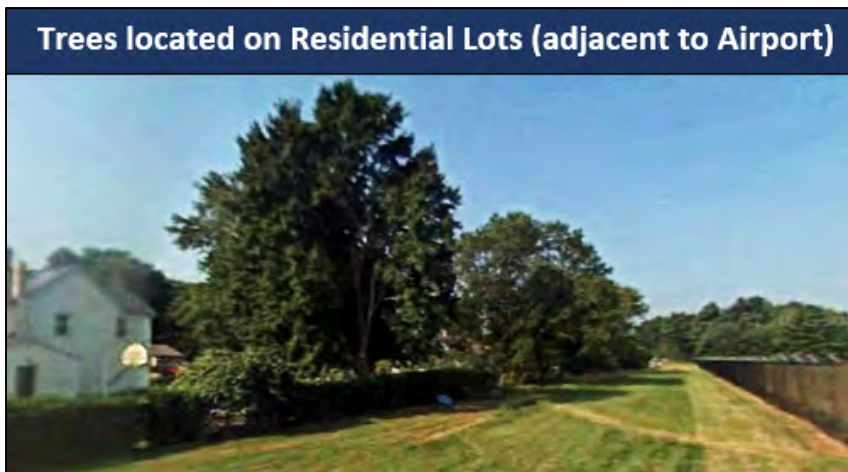
#### Runway 13 Approach

The area of selective thinning that has been identified northwest of the Airport, within the Runway 13 approach (Parcel 22) is approximately 500 feet from the nearest residence. Lands south, southwest and east of the area identified for selective thinning consist of dense woodlands with no nearby development. Thus no visual impacts are anticipated.

#### Runway 31 Approach

Obstructions have been identified within the residential area beyond Runway 31 (Parcels 3-16). Selective tree removal activities on these properties will result in changes to the viewshed of these residences, particularly in summer during 'full leaf' conditions. The tall trees on the residential parcels are scattered across the affected lots in low density and consist of both coniferous and deciduous species.

The removal of trees on these residential properties will increase the line of site into the adjacent open field of the airport property. The removal will result in less natural shade and corresponding additional sunlight.



**Trees located on Residential Lots (adjacent to Airport)**

As discussed above in Section 5.3, prior to tree removal, avigation easement would also be necessary, with payment to the individual property owners (fair-market-value based on appraisals). The easement payment is considered a mitigation to the property owner for changes in character and/or value that could occur from project activities and the new encumbrance on the parcel.

The effect or impact of this visual change is qualitative. Individuals and

homeowners may prefer the additional sunlight and open site lines or the opposite may be experienced. The tree removal on residential lots will include stump removal (i.e., grinding), with top soiling and reseeding where desired by the property owner. As such, significant visual impacts are not anticipated.

It is noted that replacement landscaping, such as replanting with low growing ornamental trees, is not eligible under for FAA project funding. However, as easement payments to property owners is required, some owners may choose to conduct landscaping or other improvements as a result of the visual changes.

### 5.12 NATURAL RESOURCES AND ENERGY SUPPLY

Energy demands associated with the proposed project is expected to be minimal as an increase in the demand for energy supplies will only occur during construction and will be limited to transportation and construction vehicles and equipment. This will not impact local or regional supplies.



### 5.13 NOISE

The preferred alternative includes the selective removal of tree obstructions surrounding the airport, including on Maryland and Rosedale Streets in the residential neighborhood southeast of Runway 31. During the project, nearby residents will experience short-term noise resulting from the removal activities.

The project will not affect airport activity levels or flight patterns. Trees removals have no impact on noise from aircraft overflights and the selective removal of trees will not result in an increase in noise emissions after the clearing is completed. As such, the project has no influence on overall aircraft generated noise.

### 5.14 SOCIOECONOMIC ISSUES

#### 5.14.1 Social

Social impacts can consist of a wide range of considerations. The social and economic concerns are always specific to the proposed action, and may include impacts such as include displacement of residents, neighborhood disruption, tax base reduction, changes in school population, public services and other community concerns.

Socioeconomic impacts are typically defined as disruptions to surrounding communities, such as shifts in patterns of population movement and growth, changes in public service demands, loss of tax revenue, and changes in employment and economic activity stemming from airport development. These impacts may result from the closure of roads, increased traffic congestion, acquisition of business districts or neighborhoods, and/or by disproportionately affecting low income or minority populations.

There will be no acquisition of land, displacement of any populations or neighborhood disruption as a result of this project. Property values will not be significantly impacted by selective removal of obstructions; therefore there will be no impact on the tax base or tax revenue of any sector. With no displacement/impact to populations there will be no impact to school populations.

Obstruction removal in no way effects the delivery of existing or future public service. The only effect of the obstruction removal is to increase the safety of airport operations; decreasing the risk of aircraft incidents thereby decreasing the possibility of loss of property or human capital. This also applies to children's environmental health and safety risks which may be associated with the pollution of air, food, water, recreational waters, soil, or products that a child is likely to be exposed to. The proposed project does not have the potential for significant impacts to this or for any population category.

#### 5.14.2 Environmental Justice

In regards to civil rights and environmental justice, the EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Title VI was enacted as part of the Civil Rights Act of 1964 to protect against discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance<sup>2</sup>. To prevent further such occurrences, Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" was authorized in 1994.

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<sup>2</sup> Title VI, 42 U.S.C. § 2000d et seq, United States Department of Justice

A review of the CT Department of Economic and Community Development list of distressed communities indicates that the Town of Killingly meets the criteria for a distressed community for the purposes of Environmental Justice, with portions of the Town with a poverty rates as high as 25%. As such, a further review was conducted for the specific Census Tract that includes the affected residential area. Per the Census data:

- The population of the affected census tract is 1,232, with <8.5% below poverty level, and approximately 10% African American or Hispanic residents
- For Windham County, the population is 109,091, with 13.9% below poverty level, and approximately 12% African American or Hispanic residents
- For all of Connecticut, the population is 3.6 million, with 10.7% below poverty level, and approximately 29% African American or Hispanic residents.

Based on the census data for the location affected, the percent of persons below the poverty level and percent minority is below that of the County and State as a whole. Based on this review, it is concluded that the project would not have a disproportionate impact to low income or minority populations, or result in concerns for environmental justice.

#### 5.14.3 Children's Health and Safety Risks

The proposed project will not result in environmental health risks and safety risks. The proposed project will not create or make more readily available products or substances that contact or ingestions through air, food, drinking water, recreational waters, or soil could harm children and therefore will not result in any significant impacts to children's health or safety.

### 5.15 SOLID WASTE

Trees removal activities on affected parcels will be conducted by a licensed and insured tree removal contractor. With the exception of limited vegetative matter that may be spread on site for decomposition, all materials, such as salvageable timber (lumber), firewood, and woodchips for landscaping or pellets will be recycled. These materials will be removed from the site by the contractor. If prescribed by agreement with property owners, logs and other materials may be left on site for use by the owner, in an approved means described in writing. As such, no solid waste impacts are anticipated.

The Connecticut DEEP has requested that commercially viable cut materials from State property be transported to the Portland Depot, a State designated mill. The transportation of these cut materials to a State designated mill for harvesting is an acceptable practice under FAA funded project, where a formal program has been established and transportation distances/costs are reasonable. The FAA does not have a defined maximum distance for transportation of cut logs or materials, it is assumed that the distance to the Portland Depot is reasonable.

Wood chips will not be spread in areas where pitch pine or scrub oak occur as recommended by the Natural Diversity Data Base as they have the potential to smother native herbaceous growth, facilitate colonization of invasive species and impact State-listed invertebrates. Proper waste management and handling wood chips will be a part of contractor specifications.

## 5.16 WATER QUALITY

### 5.16.1 Ground Water

The CTDEEP classifies types of groundwater along with their respective designated uses. Groundwater in the vicinity of the Airport is designated by the CTDEEP as Class GA. Class GA is defined as ground water within the area of existing private water supply wells or an area with the potential to provide water to public or private water supply wells with the presumption that ground water in such an area is, at a minimum, suitable for drinking or other domestic uses without treatment.

According to the Connecticut Environmental Conditions Online Mapping (CTECO), the project area is not located within an aquifer protection area. Tree removal projects do not produce wastewater or effluent, and thus do not generally impact ground water.

### 5.16.2 Surface Water

The federal Clean Water Act (CWA) and the Connecticut General Statutes establish water quality standards for all surface waters of the state. The Quinebaug River forms a portion of the northwest boundary of the Airport and is designated B. Class B designated uses include habitat for fish, aquatic life and wildlife, recreation, navigation, and industrial and agricultural water supply. Aerial photography also indicates there are one or two small ponds on undeveloped and remote areas of Danielson Airport.

There will be no impervious surface resulting from the removal of trees and no changes in drainage patterns or grading. Any disturbed areas will be mulched and reseeded. Permanent stormwater management systems are not needed as flow volumes and rates are expected to change. Construction activities will be protected by a SWPPP, where required. As a result surface water impacts are not anticipated.

## 5.17 WETLANDS

Palustrine forested (PFO) wetlands within the obstruction removal areas exhibit a variation in canopy closure of the woody overstory. In some areas, the canopy is contiguous. In other areas the PFO is interspersed with gaps. Either way, removal of the canopy layer would impact PFO wetland cover types. Tree removal work is not proposed in emergent (PEM) or open water (POW) wetland systems.

Thus, woody overstory within PFO wetlands would change from Palustrine Forested to Palustrine Scrub/Shrub as the understory layer that is currently being shaded by the overstory would be released and exposed to more sunlight, thereby allowing it to develop fully. Existing sapling hydrophytes would eventually grow to form a woody overstory canopy over time (if periodic maintenance is not conducted). Since a tall overstory layer is produced by succession over time, the loss of overstory tree layer cannot realistically be immediately replaced through wetland enhancement or mitigation measures.

However, there are a number of reasons why impact to palustrine wetlands are not expected to be significant for this project. They include the following:

- 1) The primary functions of the wetlands would not change. The Palustrine wetlands would still provide sediment retention, bank stabilization, nutrient retention/transformation, pollution retention/

transformation, production export, groundwater recharge/discharge, and wildlife habitat, as only the tree layer would be substantially reduced.

- 2) Wildlife habitat function for certain species of conservation concern reported to occur within or proximal to the airport would potentially improve (e.g., for potentially breeding Canada Warblers, and migratory or wintering Rusty Blackbirds).
- 3) An increase in the understory of water loving shrubs would increase the diversity of nectar, pollen and soft mast-producing plants as they responded to better sunlight conditions reaching the lower vegetation strata (e.g. Highbush Blueberry, Winterberry, Northern Arrowwood, Elderberry, various dogwoods, etc.). This would increase the diversity of production export from the wetland and benefit many species of small mammals, migratory birds, and resident birds.
- 4) Since trees may be felled and left in place, the crowns and boles will remain in their wetland of origin and will continue to serve as cover for wildlife.
- 5) Nutrients tied up in the tree biomass will return to the system via the natural decomposition process.
- 6) Loss of a mature tree layer is a natural ecological endpoint along a successional trajectory for many palustrine wetlands as windstorms topple shallowly rooted trees (e.g., Red Maples), flooding from beaver ponds drown existing trees, or disease causes the demise of some stands (e.g., Tobacco Ringspot Virus of Ash, Tobacco Mosaic Virus of Ash, Ash Yellows, etc.).
- 7) Tree removals avoid the grassed areas of the airport. Efforts will be made to avoid or minimize impacts to rare habitat both spatially and temporally in order to avoid or minimize impacts to nesting birds of conservation concern.

Furthermore, impact to a number of ecological functions and values would be avoided or minimized by employing best management practices (BMPs) for timber treatment within wetlands. These BMPs include the installation and maintenance of erosion and sedimentation control measures, seasonal work restrictions if applicable to breeding wildlife resources of conservation concern, and by felling timber in place with no or minimal harvest. The project specifications will avoid the use of timber mats by requiring non-mechanized removal techniques. Alternatively, if frozen ground is present during tree removal, traditional clearing may be possible without temporary fills or soil disturbance. As frozen ground cannot be relied upon, hand cutting (i.e. using chainsaws) is anticipated within wetland areas thus avoiding vehicular traffic. To avoid impacting native plants, no chipping of felled trees would be allowed to occur within sensitive natural areas.

No large-scale clearing, or any grubbing, excavation, dredging, or filling within wetland or watercourse resources is included as part of the Proposed Action. Vehicular access to many of the designated tree removal areas is possible using the existing network of roads, trails, and driveways within the adjacent upland. The project specifications may avoid the use of timber mats by requiring non-mechanized removal techniques. Alternatively, if frozen ground is present during tree removal, traditional clearing may be possible without temporary fills or soil disturbance. As frozen ground cannot be relied upon, hand cutting (i.e. using chainsaws) is anticipated within wetland areas thus avoiding vehicular traffic. The methods of access, tree cutting, work schedule, timing, and sequencing would be finalized during the permitting process in coordination with ACOE and CT DEEP Land and Water Resources Division. To avoid impacting native plants, no chipping of felled trees would be allowed to occur within sensitive natural areas.

Soil stabilization and impacts to hydric and wetland soils is not expected to be a major issue as large areas of bare soil will not be generated or exposed to the erosive forces of wind and water. Implementation, inspection, and maintenance of erosion and sedimentation control BMPs would further reduce the risk of soil loss from the occasional areas where limited amounts of soil disturbance might occur in adjacent upland areas would prevent sedimentation of wetlands and waterbodies.

The removal of tree cover from riverine systems typically raises concerns regarding bank stabilization and related erosion and sedimentation issues. Thermal pollution of the system is also generally a concern for certain riverine systems. When overhanging branches that shade the stream's waters are removed, sunlight can warm the water below. Warmer waters hold less dissolved oxygen, and many of the coldwater fisheries within the system (e.g., Black-nosed dace and Fallfish) are typically sensitive to low oxygen levels. Since tree root masses are not being removed from the system but will be left in place, bank stabilization is not expected to be compromised by tree cutting. Additionally, understory trees, shrubs and herbaceous ground cover along the stream banks will proliferate since they will be released from the low light conditions in which they had formerly been growing.



Impact to riparian habitat occurs in a very limited extent along the Quinebaug River. Along this reach of the river, the flow velocity is slower than perennial reaches further upstream out of the project area, and the river is wider creating a break in the tree canopy. Conditions along this stretch of the river are likely more favorable for a warm-water fishery. Along much of the Quinebaug River reach within the obstructions removal area, the banks of the river are quite steep. Therefore, some of the trees growing at the toe of slope on the narrow floodplain or along the water's edge may be short enough so that they may not be rendered an obstruction. Per the concerns raised by DEEP and FAA requirements, every effort will be made to avoid tree removals in within a 100-foot wide undisturbed vegetated buffer adjacent to the Quinebaug River and the transitional surface.

**Conclusion:** During the permitting phase of the project, coordination with the United States Army Corps of Engineers (ACOE) and the CT DEEP will be conducted, to provide the plan details and process to avoid wetland impacts. It is anticipated that a Section 401 Water Quality Certification and Section 404 Permit will not be required, based on planned means and methods including winter tree removal

Coordination with the CT DEEP Inland Water Resources Division (IWRD) will be completed to determine any requirements to satisfy the Connecticut Inland Wetland Protection Act. Although there will be no actual filling of wetlands, the conversion of existing forested wetlands to scrub/shrub and emergent systems will alter the wetland systems and it is anticipated that state wetland permits will likely be needed. These changes will need to be documented and considered by CT DEEP, along with BMPs and mitigation measures. Presently the CAA is exempt from having to file Flood Management Certifications (FMC) with the CT DEEP Inland Water Resources Division (IWRD).

As this project advances into the permitting phase, more detail regarding which specific trees are to be removed and the methodology used for their removal will be thoroughly coordinated with the CTDEEP and other regulatory agencies. Tree removal methodologies to be used in upland areas, within critical habitat areas, and within forested wetland areas will differ and will proceed as directed in the approved project permits.

### 5.18 WILD AND SCENIC RIVERS

According to the National Park Service website, there are two rivers in Connecticut that are designated as Wild and Scenic Rivers: the Eight Mile River and Farmington River West Branch. These rivers are not in the vicinity of Danielson Airport; therefore there will be no impact to any designated Wild and Scenic Rivers.

### 5.19 SUMMARY OF CONSEQUENCES & MITIGATION

Table 9 provides a summary of the anticipated impacts and key issues associated with the proposed project. The project is not anticipated to result in any permanent impacts or to environmental concerns.

TABLE 9 – SUMMARY OF POTENTIAL IMPACTS AND KEY ISSUES	
Impact Category	Potential Impact or Key Issue
Air Quality	The project is not anticipated to worsen the existing marginal non-attainment under NAAQS related to 8-hour ozone.
Compatible Land Use	The project will not cause a change in land use and is consistent with local zoning. No compatible land use impacts are anticipated.
Construction Impacts	Construction activity is restricted to a small project areas and will be completed in short timeframes. Tree removal will be conducted during daytime hours and employ proper erosion controls. As such, significant construction impacts (i.e., noise, air quality, erosion, traffic, etc.) are not anticipated.
Farmland	The farmland soils identified in the project area have not been used as farmland in recent history. The project will not impact farming or soils classified as prime farmland.
Fish, Wildlife, and Plants	Conducting removals during winter conditions may prevent significant impacts to critical species.
Hazardous Materials	No potential hazardous materials or concerns were identified by the regulatory database review and no hazardous materials were observed during the visual site inspection. There were no known hazardous materials in the areas of concern at Danielson Airport.
Historical, Architectural, Archeological, and Cultural Resources	SHPO has determined that the removal of trees will not have an impact on cultural or historic resources.
Light Emissions & Visual Effects	The proposed action will not create light emissions or long term visual impacts.
Natural Resources & Energy Supply	The proposed action will required only a limited amount of natural resources and energy during construction activities. No additional resources are needed following implementation.
Socioeconomic Impacts	The project will not result in any changes to land uses, the delivery of public services, or the availability of jobs. Disproportionate impacts to low income or minority populations are not anticipated.
Noise	The removal of trees does not impact flight patterns or activity levels. Trees do not provide any significant reduction in noise levels from airborne sources, such as aircraft, and thus the project will not increase the noise levels.

Water Quality	No water quality impacts are anticipated.
Wetlands	Based on the means and methods of removal, the ACOE has routinely determined that wetland impacts are not created by this type of project, and federal permits are not needed. Coordination with the CT DEEP Inland Wetlands Resources Division (IWRD) will occur during the design and permitting process to satisfy the Connecticut Inland Wetland Protection Act and determine if any permits are necessary. It is anticipated that no wetland mitigation will be necessary or will be minor.
Other Categories	The analysis identified that no coastal resources, floodplains, solid waste, or wild or scenic rivers located within the tree removal areas. Department of Transportation Act: Section 4(f): No impacts to 4(f) lands are expected.





## 6.0 REPORT PREPARERS

The following individuals prepared this EA on behalf of the CAA.

### **Federal Aviation Administration**

Richard Doucette, Environmental Program Manager

### **Connecticut Airport Authority**

Molly Parsons, Airport Planner

Colin Goegel, Senior Manager of Engineering

### **Clough Harbor & Associates LLP (CHA)**

Jeremy Martelle, Project Manager

Paul McDonnell, AICP, Principal Planner

Jean Loewenstein, AICP, Principal Planner

Scott Rosecrans, Senior Scientist

### **Fitzgerald and Halliday, Inc.**

Paul Stanton, Senior Project Manager

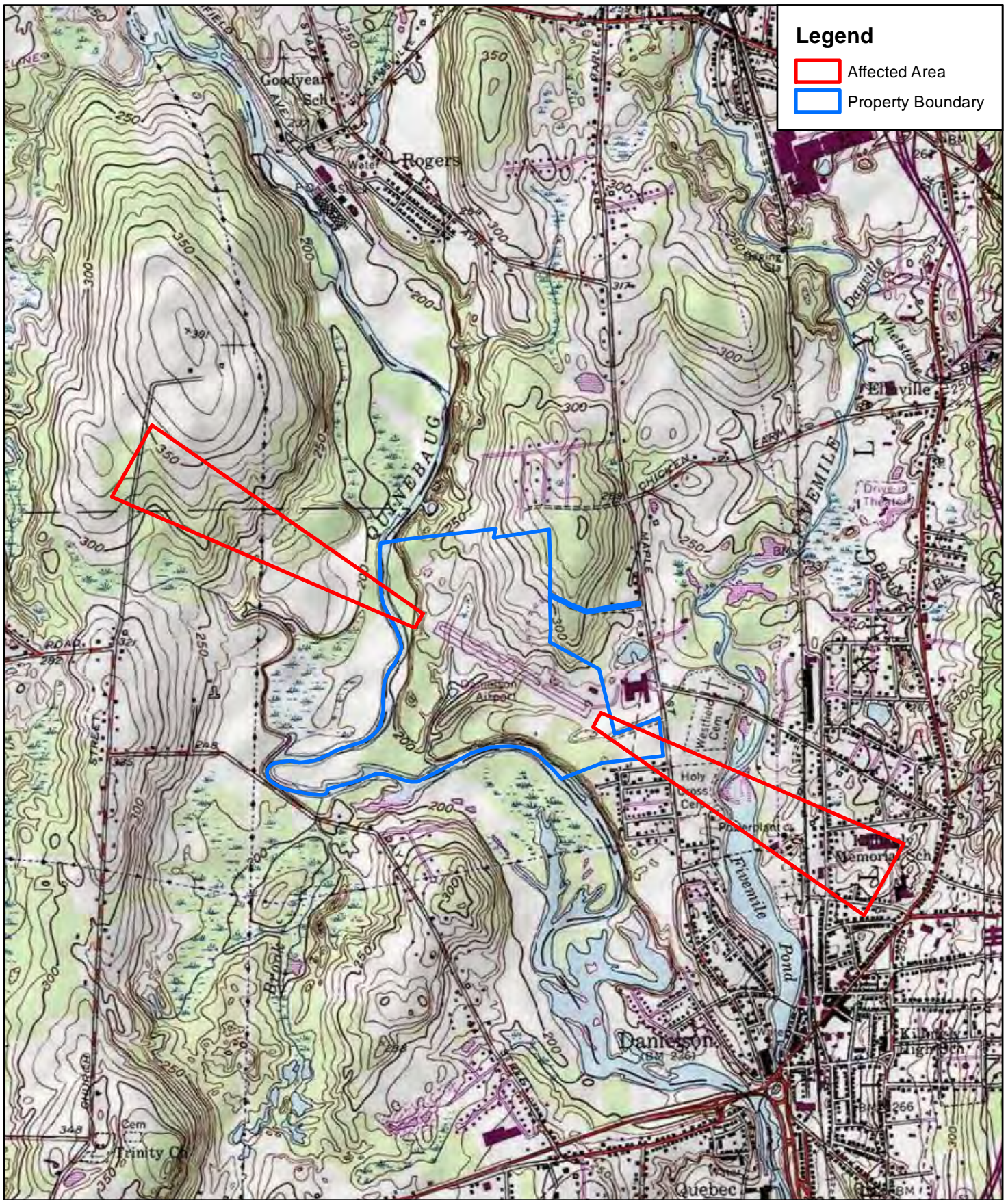
Anthony Zumba, Environmental Specialist



# APPENDIX A

## AIRPORT OBSTRUCTION MAPS



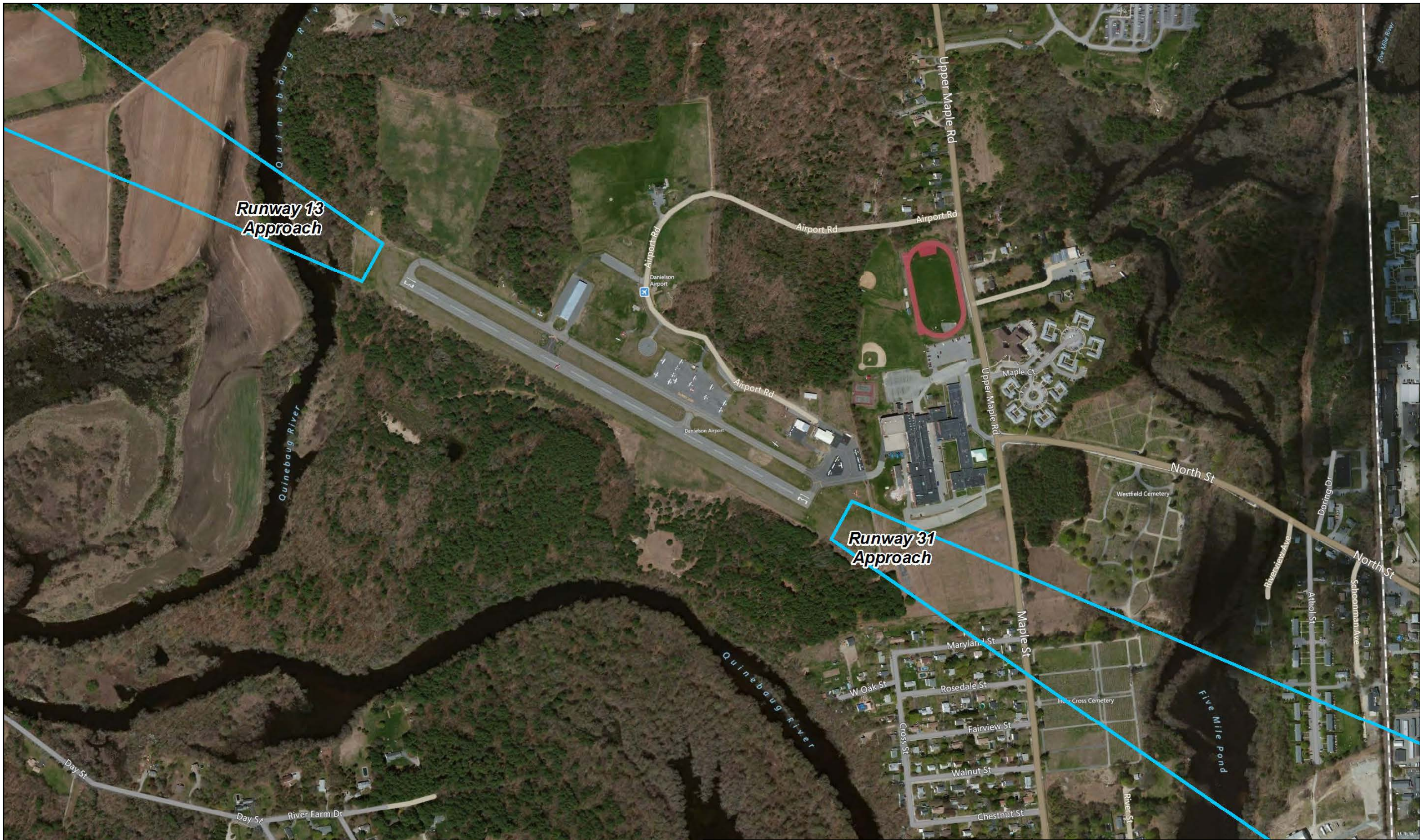


**Legend**

- Affected Area
- Property Boundary

		<p><b>CAA Environmental Assessment (EA) for Obstruction Removal Project Study Area</b></p>	
<p>Scale 1" = 2000'</p>	<p>Project No. 29067</p>	<p>Danielson Airport Danielson, Windham County, Connecticut Danielson USGS Quadrangle</p>	





**Runway 13  
Approach**

**Runway 31  
Approach**

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Project No. : 29067

Date : May 2017

0 250 500  
Feet

**Danielson Airport (LZD)**  
**Aerial Overview**  
**Environmental Assessment (EA) Study for Obstruction**  
**Removal & Lighting**  
Borough of Dayville, Windham County, Connecticut



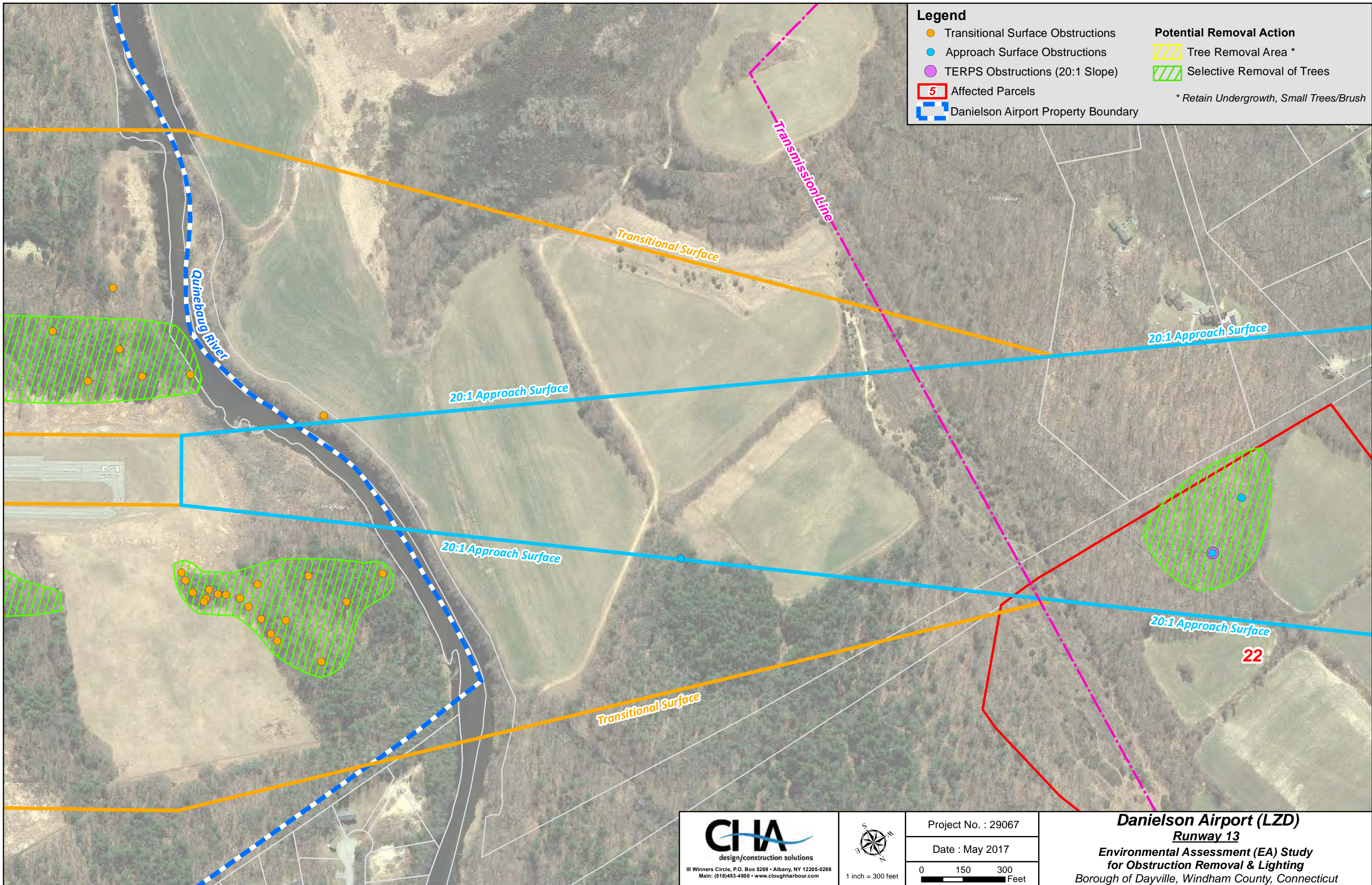


**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
  - Selective Removal of Trees
- \* Retain Undergrowth, Small Trees/Brush



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1 inch = 300 feet

Project No. : 29067  
 Date : May 2017  
 0 150 300  
 Feet

**Danielson Airport (LZD)**  
**Runway 13**  
 Environmental Assessment (EA) Study  
 for Obstruction Removal & Lighting  
 Borough of Dayville, Windham County, Connecticut

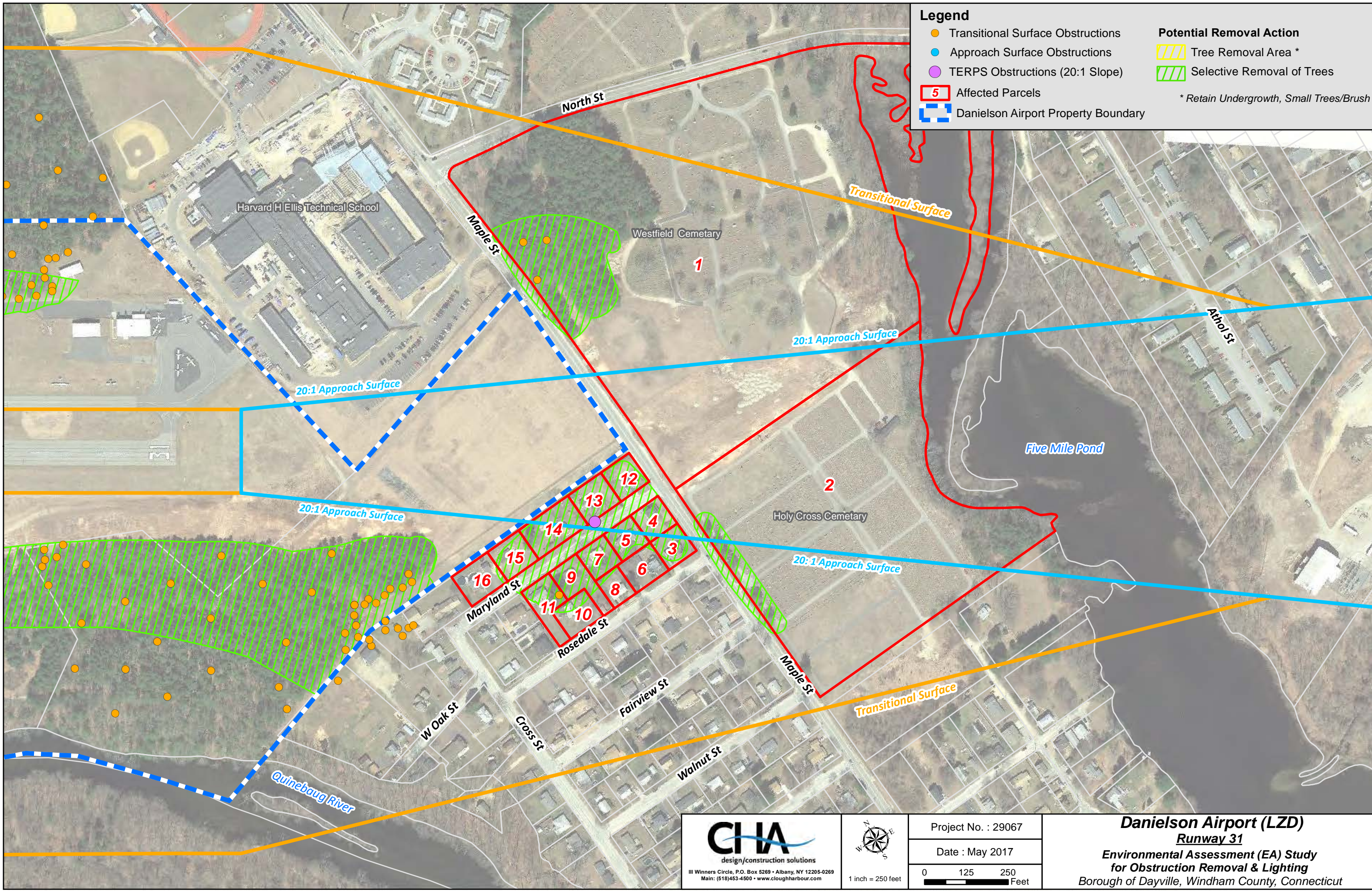


**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
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- \* Retain Undergrowth, Small Trees/Brush*



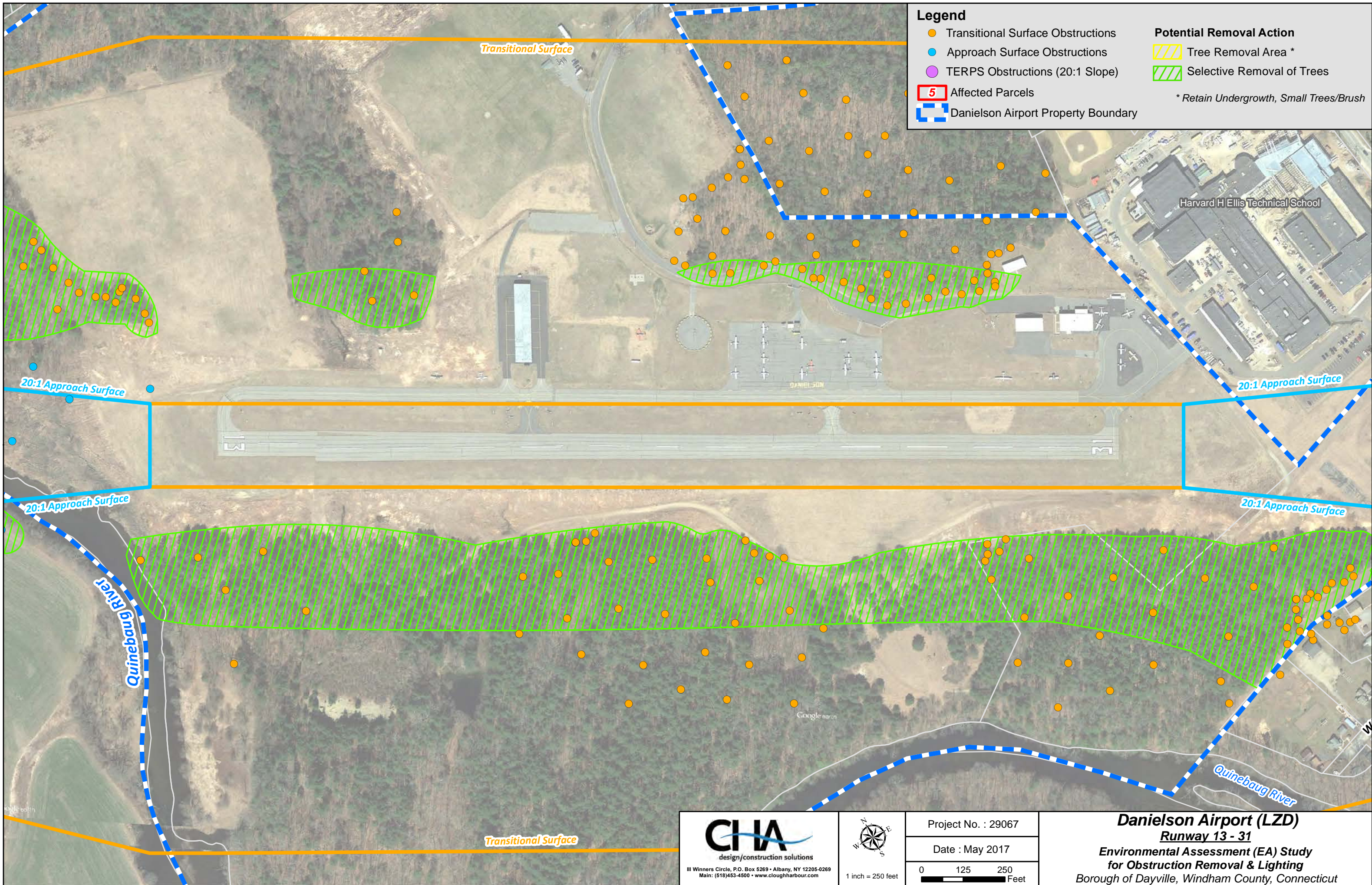
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 Main: (518)453-4500 • www.cloughharbour.com

North Arrow  
 1 inch = 250 feet

Project No. : 29067  
 Date : May 2017  
 Scale: 0 125 250 Feet

**Danielson Airport (LZD)  
 Runway 31  
 Environmental Assessment (EA) Study  
 for Obstruction Removal & Lighting  
 Borough of Dayville, Windham County, Connecticut**





**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
- Selective Removal of Trees

\* Retain Undergrowth, Small Trees/Brush

**CIA**  
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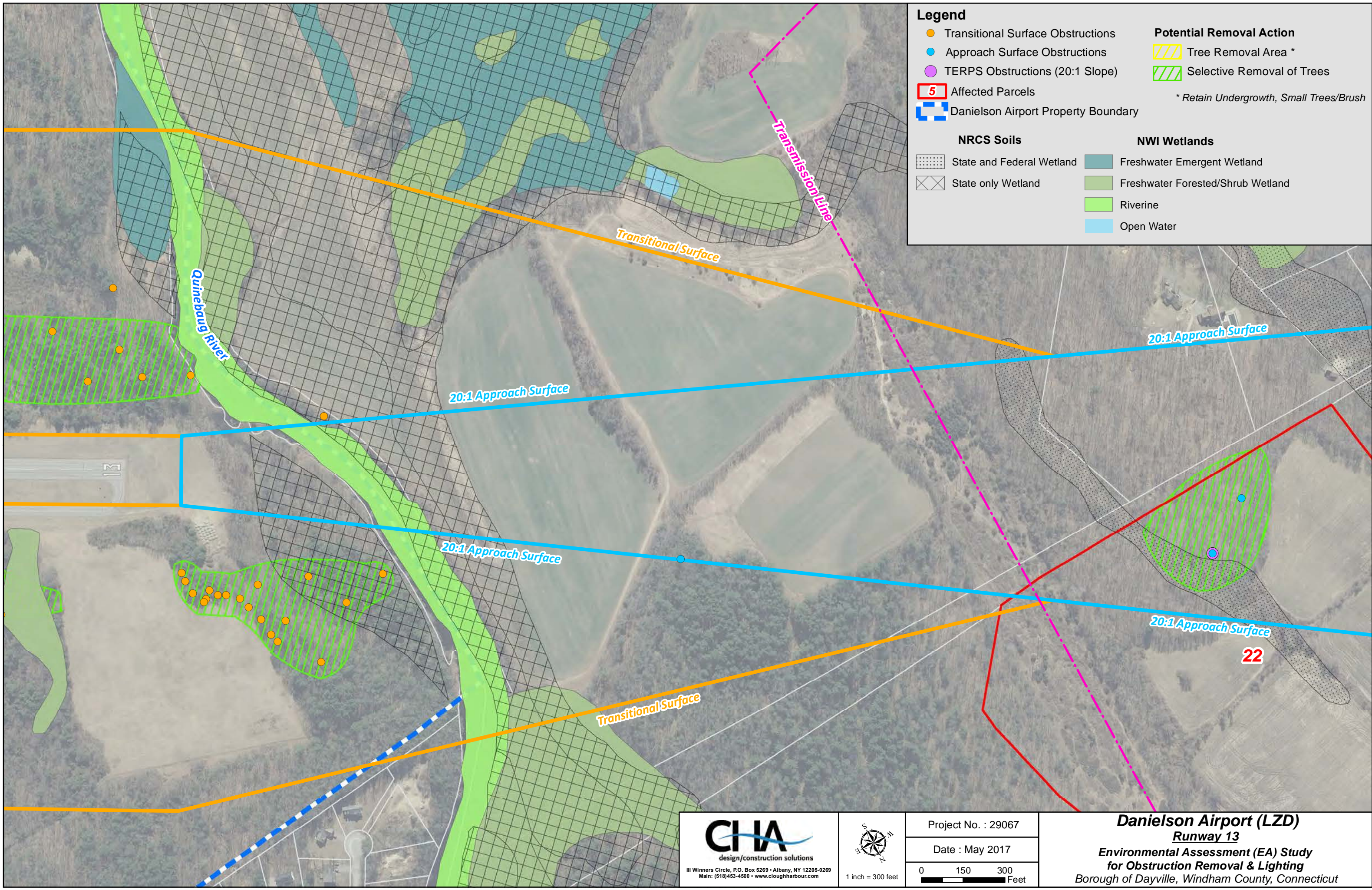
1 inch = 250 feet

Project No. : 29067  
 Date : May 2017

0 125 250  
 Feet

**Danielson Airport (LZD)**  
**Runway 13 - 31**  
**Environmental Assessment (EA) Study**  
**for Obstruction Removal & Lighting**  
 Borough of Dayville, Windham County, Connecticut





**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
- Selective Removal of Trees

*\* Retain Undergrowth, Small Trees/Brush*

**NRCS Soils**

- State and Federal Wetland
- State only Wetland

**NWI Wetlands**

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Riverine
- Open Water

**CIA**  
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 Main: (518)453-4500 • www.cloughharbour.com

1 inch = 300 feet

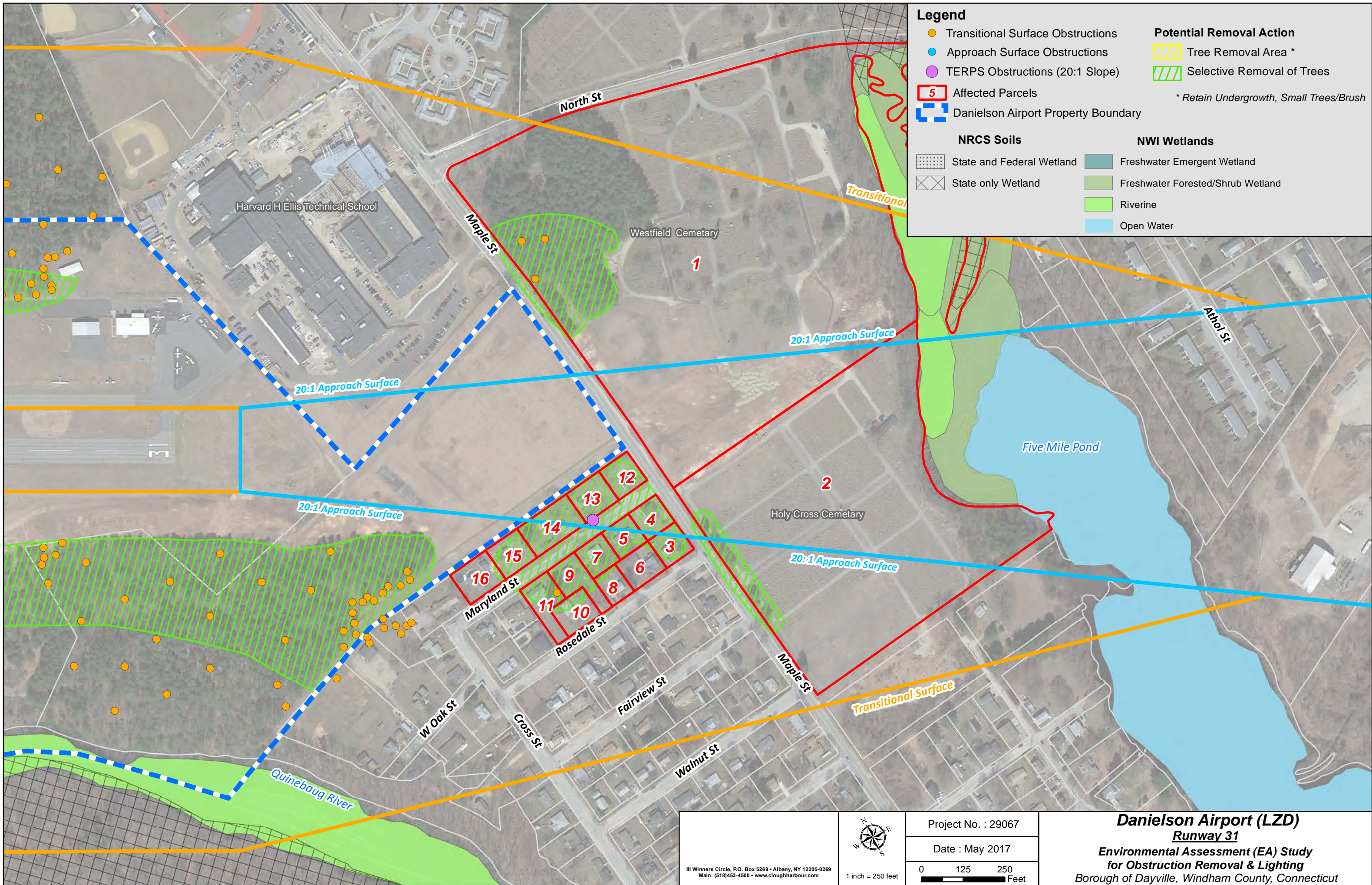
Project No. : 29067  
 Date : May 2017

0 150 300  
 Feet

**Danielson Airport (LZD)**  
**Runway 13**  
**Environmental Assessment (EA) Study**  
**for Obstruction Removal & Lighting**  
 Borough of Dayville, Windham County, Connecticut







**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
- Selective Removal of Trees
- \* Retain Undergrowth, Small Trees/Brush

**NRCS Soils**

- State and Federal Wetland
- State only Wetland

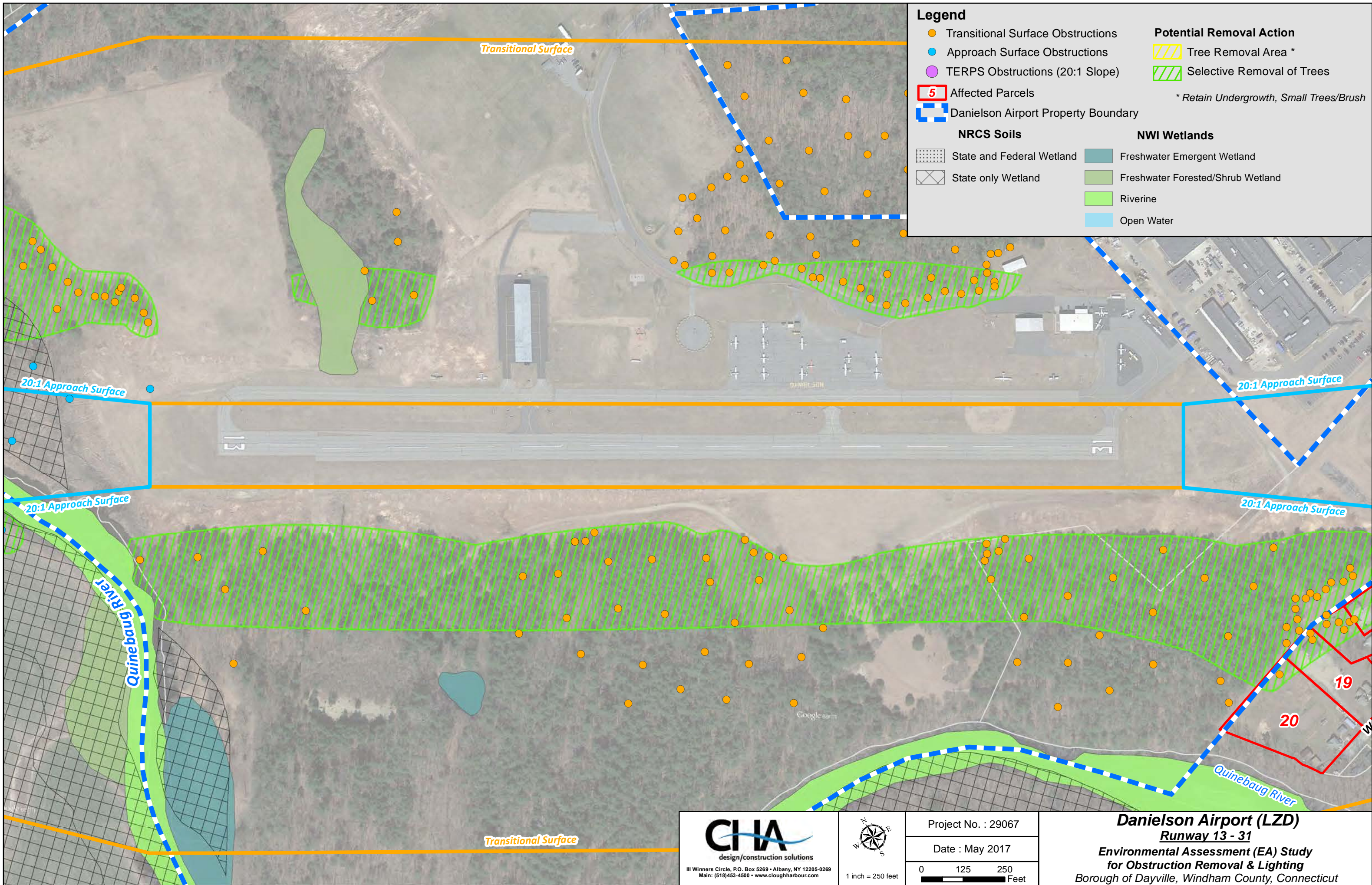
**NWI Wetlands**

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Riverine
- Open Water

III Winners Circle, P.O. Box 5269 • Albany, NY 12205-0269 Main: (518)453-4500 • www.cloughharbour.com		Project No. : 29067	<b>Danielson Airport (LZD)</b> <b>Runway 31</b> <b>Environmental Assessment (EA) Study</b> <b>for Obstruction Removal &amp; Lighting</b> Borough of Dayville, Windham County, Connecticut
		Date : May 2017	
		0 125 250 Feet	

1 inch = 250 feet





**Legend**

- Transitional Surface Obstructions
  - Approach Surface Obstructions
  - TERPS Obstructions (20:1 Slope)
  - 5 Affected Parcels
  - ▬ Danielson Airport Property Boundary
  - ▨ State and Federal Wetland
  - ▨ State only Wetland
  - ▨ Freshwater Emergent Wetland
  - ▨ Freshwater Forested/Shrub Wetland
  - ▨ Riverine
  - ▨ Open Water
  - ▨ Tree Removal Area \*
  - ▨ Selective Removal of Trees
- \* Retain Undergrowth, Small Trees/Brush

**NRCS Soils**

**NWI Wetlands**

**CHIA**  
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1 inch = 250 feet

Project No. : 29067  
 Date : May 2017

0 125 250  
 Feet

**Danielson Airport (LZD)**  
**Runway 13 - 31**  
**Environmental Assessment (EA) Study**  
**for Obstruction Removal & Lighting**  
 Borough of Dayville, Windham County, Connecticut



## **APPENDIX B CORRESPONDENCE**



**EMAIL:**

From: CT Office of Policy and Management  
To: CAA  
Date: 11/11/17  
Subject: CEPA applicability to CAA airports and projects

From: "Bye, Gareth" <[Gareth.Bye@ct.gov](mailto:Gareth.Bye@ct.gov)>  
Date: 11/9/17 5:02 PM (GMT-05:00)  
To: Paul Pernerewski <[ppernerewski@ctairports.org](mailto:ppernerewski@ctairports.org)>  
Cc: "Morley, Dan D." <[Daniel.Morley@ct.gov](mailto:Daniel.Morley@ct.gov)>, "Wittchen, Bruce" <[Bruce.Wittchen@ct.gov](mailto:Bruce.Wittchen@ct.gov)>, "Pafford, Matthew" <[Matthew.Pafford@ct.gov](mailto:Matthew.Pafford@ct.gov)>, "Sullivan, Michael" <[Michael.J.Sullivan@ct.gov](mailto:Michael.J.Sullivan@ct.gov)>  
Subject: Record of Decision pending for Bradley, Waterbury-Oxford, and Danielson GA Airport Projects

November 11, 2017

Paul,

This will serve to close out the underlying issue of whether OPM has a role in reviewing the Record of Decision (ROD) that the Airport Authority (CAA) prepared for the joint Environmental Assessment (EA) and Environmental Impact Evaluation (EIE), regarding tree work proposed for off-airport tree obstruction at Bradley, Waterbury-Oxford, and Danielson.

Section 22a-1c of the Connecticut General Statutes (CGS) states only "actions ... proposed to be undertaken by state departments, institutions or agencies, or funded in whole or in part by the state" are subject to the CT Environmental Policy Act (CEPA).

Subsection (a) of Connecticut General Statutes § 15-120bb states that "the [CAA] shall not be construed to be a department, institution or agency of the state."

OPM has determined that there is no "state action" for the captioned project because the proposed actions are not being sought by a state department, institution or agency funded in whole or part by the state, as required by Section 22a-1c of the Connecticut General Statutes.

It is clear in statute CAA has the duty, power and authority to manage, operate and develop Bradley, the general aviation airports and the other airports defined in Chapter 267b of the Connecticut General Statutes. See CGS §§ 15-120aa and 15-120bb. Any remaining bond money that may have been allocated to the DOT's Bureau of Aviation could no longer could be used by DOT because such duties moved to CAA. Consistent with CAAs authority under CGS § 15-120cc(28)(32), such bond monies, in fact, have been transferred by DOT to CAA at its request for CAA's use. Further, since DOT has no grant in place with CAA concerning such projects and there are no DOT "strings" attached to such transfers, DOT's role is simply ministerial. Stated alternatively, DOT has no involvement in the direct management, funding or authority chain associated with the applicable projects.

Therefore, the environmental review for the projects is not under CEPA.

Please feel free to contact this agency should you or your staff have any other questions.

Regards,

Gareth D. Bye  
Director of Legal Affairs  
Office of The Secretary  
State of Connecticut  
Office of Policy and Management  
450 Capitol Avenue  
Hartford, CT 06106-1379  
860-418-6433 (direct)  
860-418-6487 (fax)  
[gareth.bye@ct.gov](mailto:gareth.bye@ct.gov) (e-mail)



# Notice of Scoping for Connecticut Airport Authority (CAA) Off-Airport Obstruction Removal and Lighting Project

**Municipalities where proposed project might be located:** Windsor Locks (Bradley International Airport), Willimantic (Windham Airport), Groton (Groton-New London Airport), Oxford (Waterbury-Oxford Airport), Hartford (Hartford-Brainard Airport) and Killingly (Danielson Airport).

**Address of Possible Project Location:** Various (see above)

**Project Description:** The proposed undertaking involves preparation of National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) documentation as required to evaluate the potential impacts associated with tree obstruction removal and obstruction lighting at Bradley International Airport and the five state-owned general aviation airports as identified and listed above. The evaluation will address obstruction removals and lighting associated with Federal Aviation Regulations (FAR) Part 77, *Safe, Efficient Use, and the Preservation of Navigable Airspace* and published Terminal Instrument Procedures (TERPS), which define and regulate the airspace beyond the ends of runways through the establishment of imaginary surfaces. Objects that penetrate these surfaces are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft.

The project sponsoring agency, the Connecticut Aviation Authority (CAA), and Federal Aviation Administration (FAA) have identified that trees penetrate the airspace at Bradley International Airport and airspace at the five state-owned general aviation airports, including locations beyond defined airport property boundaries. Per FAA practice, review of off-airport obstruction removal should be evaluated and documented per federal (NEPA) and state (CEPA) environmental guidelines and requirements. This project also includes the identification of each affected property owner and associated parcels (both public and private) with necessary obstruction removals, obstruction lighting, and anticipated project access routes.

**Project Maps:** Project maps for each airport can be found at the following locations:

[Bradley International Airport Obstruction Removal and Lighting Documents](#)

[Danielson Airport Obstruction Removal and Lighting Documents](#)

[Groton-New London Airport Obstruction Removal and Lighting Documents](#)

[Hartford-Brainard Airport Obstruction Removal and Lighting Documents](#)

[Waterbury-Oxford Airport Obstruction Removal and Lighting Documents](#)

[Windham Airport Obstruction Removal and Lighting Documents](#)

**Written comments from the public are welcome and will be accepted until the close of business on: **Friday, July 17, 2015.****

**Any person can ask the sponsoring agency (CAA) 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. Such requests must be made by **Friday, June 26, 2015.****

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

**Name:** Mr. Robert J. Bruno, Director of Planning, Engineering & Environmental

**Agency:** Connecticut Airport Authority

**Address:** 334 Ella Grasso Turnpike, Suite 160  
Windsor Locks, CT 06096

**Phone:** (860) 254-5516

**E-Mail:** rbruno@ctairports.org

**If you have questions about the public meeting, or other questions about the scoping for this project, contact:**

**Name:** Mr. Robert J. Bruno, Director of Planning, Engineering & Environmental

**Agency:** Connecticut Airport Authority

**Address:** 334 Ella Grasso Turnpike, Suite 160

Windsor Locks, CT 06096

**Phone:** (860) 254-5516

**E-Mail:** rbruno@ctairports.org

**The agency expects to release an environmental document for this project, for public review and comment, in October 2015.**



STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

---

**To:** Colin Goegel - Supervising Engineer  
Connecticut Airport Authority, 334 Ella Grasso Turnpike, Windsor Locks, 06096

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

**Date:** March 3, 2017      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** Danielson Airport Obstruction Removal Project

---

The Department of Energy & Environmental Protection (DEEP) has reviewed the Environmental Assessment (EA) prepared by the Connecticut Airport Authority (CAA) for proposed obstruction removal in the area surrounding Danielson Airport. The following comments are submitted for your consideration.

The Department recognizes that the need to remove obstructions to the airspace surrounding airports to ensure their safe operation will require clearing of trees on and beyond the airport. In this case, the majority of clearing proposed is on airport property. We also understand the CAA's challenge in striking the correct balance between public safety and resource impacts in developing a plan to remove obstructions. Our comments on the document focus on recommending measures to consider to further minimize potential impacts, particularly those to the Quinebaug River.

Page 3-5 notes that FAA recognizes that off-airport clearing "is often impractical due to environmental impacts" and has defined a different approach surface, the Threshold Surface, to be utilized in such circumstances. The steeper slope of the Threshold Surface results in fewer penetrations, which should lead to reduced clearing.

The modified obstruction removal alternative, using this threshold surface criteria, has been chosen as the proposed action. However, tree removal on the banks of the Quinebaug River, which are the areas of concern to the Department, are within the transitional surface, laterally beyond the approach surface. They are also on airport property. The document does not identify if any lesser safety criteria apply to transitional surfaces or whether they would apply to on-airport property.

Page 3-5 also notes that "transitional surface obstruction clearance should be considered after approach surface obstructions are addressed," implying a lesser urgency for such obstructions. With regard to the Quinebaug River, section 4.2 discusses its inclusion in the Quinebaug & Shetucket Rivers Valley National Heritage Corridor and section 5.17 describes the value of riverbank vegetation, in general. Page 5-17 does state that "a concerted effort will be made to retain trees along the banks of this resource helping to maintain the stability of the riverine shoreline, and shade the banks and water column to the extent practicable." The Department agrees and would like to emphasize the importance of such efforts.

Preserving vegetation along the banks of the Quinebaug River should be a primary factor in developing a tree removal plan. In accordance with the Inland Fisheries Division Riparian Corridor policy, the Department recommends that every effort be made to maintain a 100-foot wide natural undisturbed riparian buffer adjacent to these waterbodies. See link for a copy of the policy: [Riparian Corridor Policy](#). A significant riparian buffer adjacent to the river regulates water temperatures and minimizes sedimentation into the river.

In discussing potential impacts to wetlands, the document describes a number of tree removal methods. The Land & Water Resources Division recommends that, after NEPA review better defines the areal and quantitative extent of proposed tree removal, the CAA arrange a pre-application meeting to discuss which techniques would best be employed at specific locations to minimize potential wetland impacts.

With regard to bats and breeding birds, page 5-9 states: “Based on other airport obstruction removal projects, direct impacts to these species may be avoided via use of seasonal restrictions (e.g., no tree cutting from May through August when these species are known to breed in New England, or other period as determined by regulatory agencies).” In order to assure protection of these species, the Department recommends that this restriction be extended: from April 1 through September 30.

The document cites the *Connecticut Comprehensive Wildlife Conservation Strategy* (CTDEEP 2005) in discussing species of greatest conservation need. Connecticut’s List of Species of Greatest Conservation Need was revised in the 2015 *Connecticut Wildlife Action Plan*.

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects, such as those undertaken by CAA, disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. The SWPCP must include measures such as erosion and sediment controls and post construction stormwater management. The construction stormwater general permit registrations can now be filed electronically through DEEP's e-Filing system known as ezFile. Additional information can be found on-line at: [Construction Stormwater GP](#).

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

cc: Robert Hannon, DEEP/OPPD  
Robert Gilmore, DEEP/LWRD  
Jenny Dickson, DEEP/WD  
Eric Thomas, DEEP/WPSD

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

Drinking Water Section

February 27, 2017

Mr. Colin Goegel  
Supervising Engineer  
Connecticut Airport Authority  
334 Ella Grasso Turnpike, Suite 160  
Windsor Locks, CT 06096

Re: Notice of EIE for the Connecticut Airport Authority (CAA)—Off-Airport Tree Obstruction Removal at the Danielson Airport

Dear Mr. Goegel:

The Drinking Water Section of the Department of Public Health has reviewed the above-mentioned project for potential impacts to any sources of public drinking water supply. This project does not appear to be in a public water supply source water area; therefore, the Drinking Water Section has no comments at this time.

Sincerely,

A handwritten signature in black ink that reads "Patricia Bisacky".

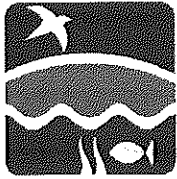
Patricia Bisacky  
Environmental Analyst 3  
Drinking Water Section



Phone: (860) 509-7333 • Fax: (860) 509-7359 • VP: (860) 899-1611  
410 Capitol Avenue, P.O. Box 340308, MS#51WAT  
Hartford, Connecticut 06134-0308

[www.ct.gov/dph/publicdrinkingwater](http://www.ct.gov/dph/publicdrinkingwater)

*Affirmative Action/Equal Opportunity Employer*



Connecticut Fund  
for the Environment

Save the Sound®

March 7, 2016

Mr. Colin Goegel  
Senior Manager of Engineering  
Connecticut Airport Authority  
334 Ella Grasso Turnpike, Suite 160  
Windsor Locks, CT 06096

**RE: Draft Environmental Assessment/Environmental Impact Evaluation for Tree  
Obstruction Removal at the Danielson Airport**

Dear Mr. Goegel,

Connecticut Fund for the Environment (“CFE”) and its bi-state program Save the Sound respectfully submit the following comments on the Draft Environmental Assessment (“EA”) and Environmental Impact Evaluation (“EIE”) for selective tree removal in the vicinity of the Danielson Airport. CFE is a state and region-wide nonprofit organization devoted to environmental protection and advocacy that represents approximately 4,700 member households in both Connecticut and New York. Upon review of the Draft EA/EIE, CFE believes that there are aspects of the analysis that warrant further consideration in order to adequately safeguard the natural resources and rights of private property owners that would be impacted under the preferred alternative.

CFE recognizes that unobstructed airspace and flight safety are reasonable and necessary objectives and that the furtherance of such objectives periodically requires CAA to conduct tree removal operations and airports throughout the state. In regard to the current proposal at the Danielson Airport, CFE believes that in preparing the final EA/EIE, CAA must conduct further analysis with respect to the impacts that may result on the numerous wetlands within the project area. Likewise, CAA must conduct further seasonal site visits to determine the full extent of potential endangered or threatened species that may be present in the immediate environs. The precise acreage of land to be affected by the preferred alternative is also indeterminate in the Draft EA/EIE and must be clearly delineated, particularly given that a large portion of the anticipated tree removal will occur on private, residential property. CAA must also take steps to adequately inform and educate affected property owners as to anticipated impacts and the process going forward. CAA must address these issues in its final EA/EIE to ensure that the environmental impacts of the preferred alternative are adequately addressed and mitigated.

**I. The Draft EA/EIE Does Not Adequately Address the Full Extent of Potential  
Impacts to Wetlands and the Quinebaug River Watershed or Potential Impacts to  
Threatened and/or Endangered Species**

Due the close proximity of the Quinebaug River to the Danielson Airport, various types of wetland are endemic throughout the proposed project area. Although the Draft EA/EIE

indicates that tree removal will occur in some wetland areas as part of the preferred alternative, it is difficult to discern the exact extent of wetlands that will be impacted if the preferred alternative is carried out as currently envisioned. Indeed, as the Draft EA/EIE notes, CAA has not taken any steps to formally delineate the extent of wetlands within the project area, instead relying on ground observations made in the course of site visits.<sup>1</sup> Relying only on personal observations rather than precise mapping of wetlands is insufficient to ensure that affected wetlands are both properly identified and ultimately protected during project implementation. In particular, the wetlands in the northern expanse of the project area flank the Quinebaug River and are thereby ecologically linked to that waterbody.<sup>2</sup> The Quinebaug River is currently listed as an impaired waterbody under section 303(d) of the Clean Water Act and has been recommended for delisting.<sup>3</sup> As the river's water quality is on the rebound, no action should be taken that risks the river relapsing into impairment. Wetlands provide a critical ecosystem service by filtering out and trapping otherwise harmful pollutants and sediments.<sup>4</sup> Accordingly, harmful impacts on wetlands in the project area will in turn lead to further degradation of water quality in the Quinebaug River. Precise delineation of affected wetlands is therefore of paramount importance in preventing adverse impacts resulting from the preferred alternative.

The Draft EA/EIE also notes that implementation of the preferred alternative will likely require CAA to obtain wetland permits and approval from the Connecticut Department of Energy and Environmental Protection ("DEEP"). Although obtaining such permits is further along in the regulatory process, CFE urges CAA to begin coordinating with appropriate DEEP staff as soon as practicable, assuming CAA has not already begun to do so. Effective communication and coordination with DEEP at the current early stage of the project will prevent any unexpected circumstances from arising further on down the line, at which point CAA will have already irretrievably committed resources. Likewise, CAA should solidify and make firm decisions on some of the other contingencies present in the Draft EA/EIE. For example, the document notes that in regard to those trees that are removed in wetland areas, CAA "may" leave the felled trees in place.<sup>5</sup> CAA should provide a firm answer and explanation as to why or why not such trees will ultimately be left where they fall. As fallen trees provide critical habitat for numerous species, such information would obviously be important to members of the public to consider when evaluating the preferred alternative's ultimate impacts on wetlands.

The final EA/EIE must also commit to deeper, site specific analysis of potential impacts to threatened and endangered species. The current draft analyzes these impacts primarily in terms of generalities about overall habitat types and species that have the potential to be present based

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<sup>1</sup> Connecticut Airport Authority, "Draft Environment Assessment (EA) & Environmental Impact Evaluation (EIE) for Obstruction Removal Danielson Airport (LZD)," 4-7 (Jan. 2017), available at <http://danielsonairport.caa-analysis.com/resources/documents/29067-LZD%20DRAFT%20EA%202017.01.pdf>.

<sup>2</sup> *Id.*

<sup>3</sup> Connecticut Department of Energy and Environmental Protection, "2016 Integrated Water Quality Report," 360 (Jan. 2017), available at [http://www.ct.gov/deep/lib/deep/water/water\\_quality\\_management/305b/2016\\_iwqr\\_draft.pdf](http://www.ct.gov/deep/lib/deep/water/water_quality_management/305b/2016_iwqr_draft.pdf) (last visited March 6, 2017).

<sup>4</sup> State of Washington Department of Ecology, "Functions and Value of Wetlands," available at <http://www.ecy.wa.gov/programs/sea/wetlands/functions.html> (last visited March 7, 2017).

<sup>5</sup> Connecticut Airport Authority, *supra* note 1, at 5-9.

on historical range.<sup>6</sup> Although the Draft EA/EIE indicates that site visits to identify potentially affected species occurred during August, the document further explains that the proposed tree removal would preferably occur during the winter months.<sup>7</sup> As such, an August site visit is of little utility in identifying those species that may be presented when tree removal would actually occur. CAA should undertake a site visit to identify affected species during the time period at which the actual project is proposed to occur.

## **II. The Draft EA/EIE is Imprecise as to the Exact Extent of Tree Removal and Contains No Information on CAA's Plans to Coordinate and Educate Property Owners About Tree Removal on Private Property**

As a preliminary matter, the Draft EA/EIE provides conflicting estimates of the exact acreage of land that will be affected by tree removal conducted pursuant to the preferred alternative. At various points throughout the document, the affected acreage provided varies between several figures including six acres,<sup>8</sup> 46 acres,<sup>9</sup> and 95 acres.<sup>10</sup> This lack of specificity makes it difficult to determine the full extent of planned tree removal and greater clarity in this regard would allow the public and affected landowners to draw more informed and helpful conclusions from CAA's proposal.

Furthermore, the Draft EA/EIE contains scant detail about those trees on private, residential property that will be removed under the preferred alternative. Naturally, given that many of these trees will be located in the yards of private residences and property owners will be attached to them, CAA must be as forthright and clear as possible in developing any plans to remove trees on private land. As CAA is likely aware, recent tree removal alongside Connecticut's roadways has proved a flashpoint for controversy that catalyzed citizen action around issues of tree removal on private property. CAA should commence coordination with Killingly municipal officials and the town tree warden as soon as possible in order to fully engage the local community and ensure that any citizens whose properties may be affected have ample notice of proposed removal and an opportunity to contest removal.

## **III. The Draft EA/EIE Contains No Information Regarding Climate Change or the Climatological Impacts of Widespread Tree Removal**

CFE is also concerned that the current Draft EA/EIE contains no analysis or evaluation regarding climate change and the importance of trees in reducing atmospheric carbon dioxide levels. Anthropogenic climate change is doubtless the greatest environmental challenge of the present time and every EA, EIE, and EIS should evaluate how any proposed project or action has the potential to contribute to—or diminish—the effects of the climate change. Furthermore, the current proposal for the Danielson Airport is but one of several tree removal projects that CAA has proposed at various airports through Connecticut. The Draft EA/EIEs issued for these other projects also contained no analysis of climate change in relation to the proposed tree removals.

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<sup>6</sup> *Id.* at 4-5-4-6.

<sup>7</sup> *Id.* at 5-9.

<sup>8</sup> *Id.* at 3-5.

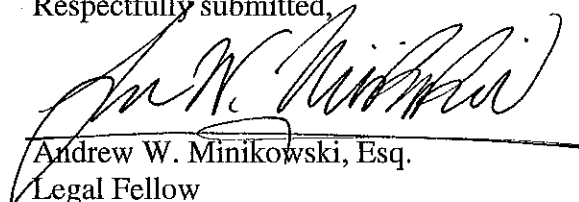
<sup>9</sup> *Id.*

<sup>10</sup> *Id.* at 5-6



On its own, a small proposal like the current Danielson Airport plan is innocuous. On a statewide scale, however, the number of trees that would be removed pursuant to CAA's various obstruction removal plans is quite a large number. CFE urges CAA to conduct a programmatic statewide analysis of the impacts of tree removal throughout the state and how the overall tree loss would impact the carbon sequestration services that Connecticut's trees provide to both the state and region.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew W. Minikowski". The signature is written in a cursive style and is positioned above a horizontal line.

Andrew W. Minikowski, Esq.

Legal Fellow

Connecticut Fund for the Environment

[aminikowski@ctenvironment.org](mailto:aminikowski@ctenvironment.org)

203-787-0646 (ex. 108)



June 5, 2015

Mr. John Hallberg, Chairman  
Killingly Town Council  
Killingly Town Hall  
172 Main Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal and Lighting  
Connecticut Airport Authority

Dear Chairman Hallberg:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate Danielson Airport's (Airport) federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential impacts of removing trees and/or installing a pole-mounted red obstruction light in areas that contain airspace obstructions.

To accomplish this, the CAA is conducting an Environmental Assessment (EA) under federal and state regulations to identify affected properties and any potential environmental issues of removing trees and/or installing pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. As more information becomes available it will be posted on the following website: <http://danielsonairport.caa-analysis.com>.

Several properties in the Town of Killingly have been identified as potentially having an obstruction that penetrates the federally protected airspace. A map identifying the existing tree obstruction areas and a list of affected parcel is enclosed.

The CAA has contracted with the consulting firm of Clough Harbour Associates (CHA) to prepare the required environmental assessment. CHA will be conducting visual reviews of the subject areas. In many instances the field personnel will complete their review from the public right-of-way; however in certain instances personnel may find it necessary to briefly enter private property to observe trees and site conditions with permission from homeowners. These inspections will occur in the spring and summer of 2015. These personnel will all carry proper identification (sample attached).

Should you have any questions or concerns regarding this project, please contact Jean Loewenstein with CHA. She can be reached (518) 453-8771 or via email at [jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com).

Sincerely,

Kevin A. Dillon, A.A.E.  
Executive Director

Enclosure



February 1, 2017

Westfield Cemetery Association  
Attn: Kraig Griffin  
PO Box 564  
440 Putnam Pike  
Killingly, CT 06241

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 321 North Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

In addition, the CAA will be holding a Public Information Meeting for the Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal. At this meeting, information on the overall project and the study's findings, including the Preferred Alternative, will be presented. The meeting will be held on Thursday, February 23<sup>rd</sup> at the Killingly Town Hall in the Town Meeting Room (172 Main Street, Killingly, CT 06239). In case the meeting is canceled due to weather conditions, a secondary date for the meeting will be held on Wednesday, March 8<sup>th</sup>, 2017. The doors open at 6:30 PM with the presentation beginning at 7:00 PM.

Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

Should you have any questions or concerns regarding the field observation, please contact Jean Loewenstein with Clough, Harbour & Associates LLP (CHA). She can be reached at (518) 453-8771 or via email at [rloewenstein2@chacompanies.com](mailto:rloewenstein2@chacompanies.com).

Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

St. James Roman Catholic Church  
12 Franklin Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 372 Maple Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.


To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Ms. Marjorie J. Rosenblum  
395 Maple Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 395 Maple Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

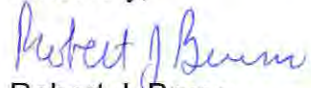
To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

In addition, the CAA will be holding a Public Information Meeting for the Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal. At this meeting, information on the overall project and the study's findings, including the Preferred Alternative, will be presented. The meeting will be held on Thursday, February 23<sup>rd</sup> at the Killingly Town Hall in the Town Meeting Room (172 Main Street, Killingly, CT 06239). In case the meeting is canceled due to weather conditions, a secondary date for the meeting will be held on Wednesday, March 8<sup>th</sup>, 2017. The doors open at 6:30 PM with the presentation beginning at 7:00 PM.

Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---





February 1, 2017

Ms. Kelly Dery  
403 Maple Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 403 Maple Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

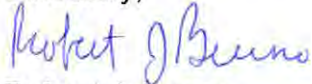
To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

In addition, the CAA will be holding a Public Information Meeting for the Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal. At this meeting, information on the overall project and the study's findings, including the Preferred Alternative, will be presented. The meeting will be held on Thursday, February 23<sup>rd</sup> at the Killingly Town Hall in the Town Meeting Room (172 Main Street, Killingly, CT 06239). In case the meeting is canceled due to weather conditions, a secondary date for the meeting will be held on Wednesday, March 8<sup>th</sup>, 2017. The doors open at 6:30 PM with the presentation beginning at 7:00 PM.

Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Ms. Sylvia M. Marcoux  
11 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 11 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

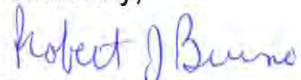
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Michael J. & Carol Fitzpatrick  
12 Rosedale Street  
Killingly, CT 06240

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 12 Rosedale Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

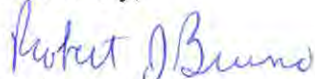
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Gregory J. & Denise E. Walsh  
19 Maryland Street  
Killingly, CT 06240

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 19 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---





February 1, 2017

Ms. Kay E. Desruisseau  
24 Rosendale Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 24 Rosendale Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

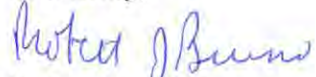
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

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February 1, 2017

Ms. Susan A. Wolchesky  
29 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 29 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Federal National Mortgage Association  
PO Box 650043  
Dallas, TX 75265

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 34 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

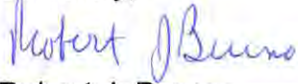
To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

In addition, the CAA will be holding a Public Information Meeting for the Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal. At this meeting, information on the overall project and the study's findings, including the Preferred Alternative, will be presented. The meeting will be held on Thursday, February 23<sup>rd</sup> at the Killingly Town Hall in the Town Meeting Room (172 Main Street, Killingly, CT 06239). In case the meeting is canceled due to weather conditions, a secondary date for the meeting will be held on Wednesday, March 8<sup>th</sup>, 2017. The doors open at 6:30 PM with the presentation beginning at 7:00 PM.

Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

Should you have any questions or concerns regarding the field observation, please contact Jean Loewenstein with Clough, Harbour & Associates LLP (CHA). She can be reached at (518) 453-8771 or via email at [rloewenstein2@chacompanies.com](mailto:rloewenstein2@chacompanies.com).

Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Ms. Brianna M. Savoie  
35 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 35 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

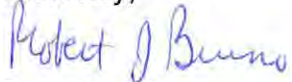
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---





February 1, 2017

Roger & Melanie Privee  
415 Maple Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 415 Maple Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

To accomplish this, the CAA conducted an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees. A map of the existing tree obstruction areas is included. We wanted to inform you that your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. The Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Report is available for your review on the following website: <http://danielsonairport.caa-analysis.com/>.

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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

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February 1, 2017

Mr. Dave R. Stuyntisku  
140 Herrick Street  
Brooklyn, CT 6234

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 14 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

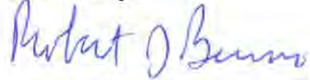
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Mr. Timothy B. Bollinger  
24 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 24 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

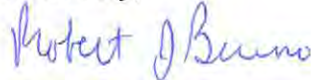
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Ms. Mary E. Desjardin  
56 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 34 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

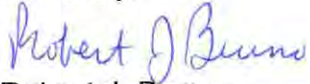
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---





February 1, 2017

David & Joanna Desjardin  
44 Maryland Street  
Killingly, CT 06239

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 44 Maryland Street

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

---



February 1, 2017

Ms. Juanita R. Cristina & Ms. Sheila S. Nabozny  
253 Killingly Avenue  
Putnam, CT 6260

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal  
Affected Property at 101 Woods Hill Road

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

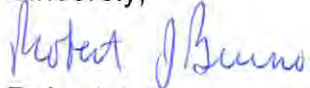
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Property Owner  
Danielson Airport – Environmental Assessment for Obstruction Removal  
February 1, 2017  
Page 2 of 2

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Sincerely,



Robert J. Bruno  
Director of Planning,  
Engineering & Environmental Services

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## Loewenstein, Jean

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**From:** Labadia, Catherine <Catherine.Labadia@ct.gov>  
**Sent:** Wednesday, January 04, 2017 2:27 PM  
**To:** Loewenstein, Jean  
**Cc:** McDonnell, Paul  
**Subject:** RE: Environmental Assessment for Obstruction Removal and Lighting- CAA General Aviation Airports and Bradley International Airport

Jean,  
I am very embarrassed to say that I am finally getting to review items from November – my apologies. Yes, the surveys are not required if the beacons are no longer part of the project.  
Thank you for providing the additional information,  
Cathy

---

**From:** Loewenstein, Jean [mailto:RLoewenstein2@chacompanies.com]  
**Sent:** Tuesday, October 18, 2016 10:55 AM  
**To:** Labadia, Catherine  
**Cc:** McDonnell, Paul  
**Subject:** FW: Environmental Assessment for Obstruction Removal and Lighting- CAA General Aviation Airports and Bradley International Airport

Good Morning Catherine,  
I am following up on my email and phone call of last week regarding the CAA's Environmental Assessments for Obstruction Removal. We would like to confirm that as the installation of beacons is no longer a part of any of these projects, the request for professional cultural resource assessment and reconnaissance surveys no longer applies.

Please contact me with any questions.

Jean

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**From:** Loewenstein, Jean  
**Sent:** Monday, October 10, 2016 10:22 AM  
**To:** 'Labadia, Catherine' <Catherine.Labadia@ct.gov>  
**Cc:** McDonnell, Paul <PMcDonnell@chacompanies.com>; Martelle Sr, Jeremy <JMartelle@chacompanies.com>  
**Subject:** Environmental Assessment for Obstruction Removal and Lighting- CAA General Aviation Airports and Bradley International Airport

Good Morning Catherine,  
I am contacting you in regard to the above referenced projects and correspondence from your office dated November 17, 2015 (attached). In this correspondence your office indicated that while tree removal would not result in impacts to archeological sites, the installation of beacons would require the completion of professional cultural resource assessment and reconnaissance surveys prior to their installation. Since the date of this correspondence, the planned beacons have removed from all five general aviation airports and Bradley International airport and as such the projects will not require the completion of the above referenced surveys.

Should you have any questions, please do not hesitate to contact me.

**Jean Loewenstein**  
Principal Planner

**CHA** ~ *design/construction solutions*

Office: (518) 453-8771

[jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com)

[www.chacompanies.com](http://www.chacompanies.com)



Responsibly Improving the World We Live In





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Federal Aviation Administration  
New England Region

12 New England Executive Park  
Burlington, MA 01803

November 8, 2016

Ms. Catherine Labadia, Staff Archeologist  
Connecticut Department of Economic & Community Development  
Offices of Culture and Tourism, State Historic Preservation Office  
One Constitution Plaza-2<sup>nd</sup> Floor  
Hartford, CT. 06103

**RE: Connecticut Airport Authority - Obstruction Removal at various Airports**

Dear Ms. Labadia:

This is in regards to past correspondence dated September 30, 2015 to your office as it relates to historic and archeological resources. In your November 17, 2015 response SHPO identified no issues with tree removal but did identify a potential concern as it relates to the installation of beacons. Past correspondence is attached for your convenience.

Since that time the installation of beacons has been eliminated from consideration at all the above referenced airports. After review of the relevant information, the FAA issues a Section 106 Finding of No Adverse Effects to Historic Properties.

If you have any questions, please feel free to contact me at 781-238-7613 or [richard.doucette@faa.gov](mailto:richard.doucette@faa.gov) or the CAA Director of Engineering Robert Bruno at (860) 254-5516 or [rbruno@ctairports.org](mailto:rbruno@ctairports.org)

Sincerely,

Richard P. Doucette  
Manager of Environmental Programs  
FAA New England Region

Enclosures

Cc: Colin Goegel, Project Manager, CAA  
Robert Bruno, Director of Planning Engineering and Environmental, CAA  
Kurt Sendlein, Airport Manager



November 17, 2015

Ms. Jean Lowenstein  
CHA, Inc.  
3 Winners Circle  
Albany, NY 12205

Subject: Connecticut Airport Authority NEPA Environmental Assessment for Obstruction  
Removal and Lighting at  
Hartford-Brainard Airport, Hartford (CHA 29067)  
Danielson Airport, Killingly (CHA 29067)  
Waterford-Oxford Airport, Oxford (CHA 29067)  
Windham Airport, Windham (CHA 29067)  
Bradley International Airport, Windsor Locks (CHA 29055)

Dear Ms. Lowenstein:

The State Historic Preservation Office (SHPO) has reviewed your request for our comments regarding potential effects to historic properties for the referenced project. The existing airports referenced above have been identified as needing tree removal and pole mounted obstruction beacons. The review request currently exceeds the staffing available at this office. A preliminary review completed by this office identified archeological sites and/or historic districts within or in close proximity to each of the identified facilities. SHPO understands that the tree removal will be done with as little ground disturbance as possible, without grubbing and grading. As a result, this office considers the potential impact to archeological sites from obstruction removal to be minimal, if any.

SHPO is concerned, however, with the effects of the proposed beacons on archeological sites and historic buildings. Several of the proposed beacons are located in areas where archeological sites have been reported, as well as historic buildings or districts. We are therefore requesting that a professional cultural resources assessment and reconnaissance survey be completed prior to construction of any beacons. The survey should take into consideration potential indirect impacts on structures older than fifty years that may be eligible for listing on the National Register of Historic Places. An archeological assessment should determine the appropriate level of investigation based on sufficient research and field visits. Subsurface testing for archeological resources, if warranted, should assess all areas of anticipated ground disturbance that are considered to have a moderate/high sensitivity for containing significant archeological deposits. All work should be in compliance with our *Environmental Review Primer for Connecticut's Archeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey.

The SHPO appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act, as amended. For additional information, please contact me at (860) 256-2764 or [catherine.labadia@ct.gov](mailto:catherine.labadia@ct.gov).

Sincerely,

Catherine Labadia  
Deputy State Historic Preservation Officer

State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | P: 860.256.2800 | [Cultureandtourism.org](http://Cultureandtourism.org)

*An Affirmative Action/Equal Opportunity Employer An Equal Opportunity Lender*





September 30, 2015

Ms. Catherine Labadia, Staff Archeologist  
Connecticut Department of Economic & Community Development  
Offices of Culture and Tourism  
State Historic Preservation Office  
One Constitution Plaza-2<sup>nd</sup> Floor  
Hartford, CT. 06103

**RE: Connecticut Airport Authority- Danielson Airport  
NEPA Environmental Assessment (and CEPA EIE) for Obstruction Removal &  
Lighting  
CHA Project No.: 29067**

Dear Ms. Labadia:

Thank you for your recent assistance regarding submittal requirements to the Connecticut SHPO. On behalf of the Connecticut Airport Authority, CHA is submitting a request for review of the above referenced project located at Danielson Airport and vicinity, in the Town of Killingly, Windham County Connecticut.

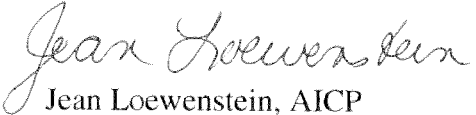
The Connecticut Airport Authority (CAA) previously conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential impacts of tree removal, and selective clearing or installation of pole-mounted red obstruction beacons in areas that contain airspace obstructions. Objects that penetrate these surfaces are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft.

To accomplish this, the CAA is conducting an NEPA Environmental Assessment (EA) and CEPA Environmental Impact Evaluation (EIE) to identify affected properties and any potential environmental issues of removing trees and/or installing obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. Tree removal or obstruction light installation will be accomplished under a future project. Maps outlining the potential location for tree removal and possible siting locations for the beacons are enclosed and can also be found at the project website. The web address is as follows: <http://danielsonairport.caa-analysis.com>

As part of this evaluation of potential impacts we are requesting that SHPO review the draft mapping of potential tree removal areas and beacon installation locations as it relates to historic and archeological resources so that potential impacts may be considered in future actions. It should also be noted that when tree removal does occur it will generally include clearing, without grubbing or grading and will be implemented with minimal soil disturbance (e.g., removal to trees, with retention stumps and undergrowth).

Thank you for your prompt attention to this matter. If you have any questions, please feel free to contact me at 518-453-8771 or [jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com) or the CAA Director of Engineering Robert Bruno at (860) 254-5516 or [rbruno@ctairports.org](mailto:rbruno@ctairports.org).

Sincerely,

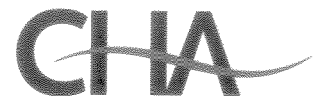
  
Jean Loewenstein, AICP  
Senior Planner

JL/sc

Enc.

Cc: Colin Goegel, Project Manager, CAA  
Robert Bruno, Director of Planning Engineering and Environmental, CAA  
Kurt Sendlein, Airport Manager

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State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | 860.256.2800 | Cultureandtourism.org

PROJECT REVIEW COVER FORM

1. This information relates to a previously submitted project.

You do not need to complete the rest of the form if you have been previously issued a SHPO Project Number. Please attach information to this form and submit

SHPO Project Number (Not all previously submitted projects will have project numbers)

Project Address (Street Address and City or Town)

2. This is a new Project.

If you have checked this box, it is necessary to complete ALL entries on this form .

Project Name Environmental Assessment Study for Obstruction Removal and Lighting

Project Location 70 Airport Road Include street number, street name, and or Route Number. If no street address exists give closest intersection.

City or Town Danielson In addition to the village or hamlet name (if appropriate), the municipality must be included here.

County Windham If the undertaking includes multiple addresses, please attach a list to this form.

Date of Construction (for existing structures) N/A

PROJECT DESCRIPTION SUMMARY (include full description in attachment):

Environmental Assessment to document potential impacts associated with tree obstruction removal and obstruction lighting. The evaluation addresses obstruction removal and lighting associated with Federal Aviation Regulations Part 77, Safe, Efficient Use and Preservation of Navigable Airspace and published Terminal Instrument Procedures which define and regulate airspace beyond the ends of runways.

TYPE OF REVIEW REQUESTED

a. Does this undertaking involve funding or permit approval from a State or Federal Agency?

Yes No

Table with 4 columns: Agency Name/Contact, Type of Permit/Approval, State, Federal. Rows include CAA and FAA.

b. Have you consulted the SHPO and UCONN Dodd Center files to determine the presence or absence of previously identified cultural resources within or adjacent to the project area?

If yes: Was the project site wholly or partially located within an identified archeologically sensitive area?

Does the project site involve or is it substantially contiguous to a property listed or recommended for listing in the CT State or National Registers of Historic Places?

Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older?



State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | 860.256.2800 | Cultureandtourism.org

PROJECT REVIEW COVER FORM

The Historic Preservation Review Process in Connecticut Cultural Resource Review under the National Historic Preservation Act – Section 106 http://www.achp.gov/106summary.html involves providing technical guidance and professional advice on the potential impact of publicly funded, assisted, licensed or permitted projects on the state's historic, architectural and archaeological resources.

Project review is conducted in two stages. First, the SHPO assesses affected properties to determine whether or not they are listed or eligible for listing in the Connecticut State or National Registers of Historic Places. If so, it is deemed "historic" and worthy of protection and the second stage of review is undertaken. The project is reviewed to evaluate its impact on the properties significant materials and character.

ALL PROJECTS SUBMITTED FOR REVIEW MUST INCLUDE THE FOLLOWING MATERIALS\*:

[X] PROJECT DESCRIPTION Please attach a full description of the work that will be undertaken as a result of this project. Portions of environmental statements or project applications may be included. The project boundary of the project should be clearly defined\*\*

[X] PROJECT MAP This should include the precise location of the project – preferably a clear color image showing the nearest streets or roadways as well as all portions of the project. Tax maps, Sanborn maps and USGS quadrangle maps are all acceptable, but Bing and Google Earth are also accepted if the information provided is clear and well labeled. The project boundary should be clearly defined on the map and affected legal parcels should be identified.

[ ] PHOTOGRAPHS Clear, current images of the property should be submitted. Black and white photocopies will not be accepted. Include images of the areas where the proposed work will take place. May require: exterior elevations, detailed photos of elements to be repaired/replaced (windows, doors, porches, etc.) All photos should be clearly labeled.

Table with 4 columns: Item, Yes, N/A, Comments. Rows include: For Existing Structures (Property Card), For New Construction (Project plans or limits of construction, Historic District renderings, Soils Maps, Historic Maps), and For non-building-related projects (Property Card, Soils Map, Historic Maps).

PROJECT CONTACT

Name Jean Loewenstein Title Senior Planner
Firm/Agency CHA Inc.
Address 3 Winners Circle
City Albany State NY Zip 12205
Phone 518-453-8771 Cell Fax 518-4534522
Email jloewenstein@chacompanies.com

\*Note that the SHPO's ability to complete a timely project review depends largely on the quality of the materials submitted.
\*\* Please be sure to include the project name and location on each page of your submission.



September 30, 2015

Mr. Thomas Tyler, Director  
Bureau of Outdoor Recreation  
Connecticut Department of Energy & Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106-5127

**RE: Connecticut Airport Authority- Danielson Airport  
Environmental Assessment for Obstruction Removal and Lighting  
CHA File: 29067**

Dear Mr. Tyler:

On behalf of the Connecticut Airport Authority (CAA), CHA is submitting a request for review of the above referenced project located at Danielson Airport and vicinity, in the Town of Killingly, Windham County, Connecticut as it relates to resources defined by Section 4(f) of the Department of Transportation Act of 1966.

The CAA has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA and FAA are reviewing the potential impacts of tree removal, and selective clearing or installation of pole-mounted red obstruction beacons in areas that contain airspace obstructions. Objects that penetrate these surfaces are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft.

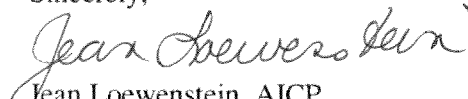
To accomplish this, the CAA is conducting a NEPA Environmental Assessment (EA) and CEPA Environmental Impact Evaluation (EIE) to identify affected properties and any potential environmental issues of removing trees and/or installing a pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. Tree removal or obstruction light installation will be accomplished under a future project following appropriate approvals. Maps identifying the potential location for tree removal and possible siting locations for the beacons are enclosed and can also be found at the project website. The web address is as follows:  
<http://danielsonairport.caa-analysis.com/>.

The Quinebaug River is located in close proximity to the end of the Danielson Airport Runway 13, and is adjacent to two areas on airport property that have been identified as an area of potential selective removal of trees. Recognizing that the Quinebaug River Valley National Heritage Corridor is an important statewide resource, we would like your office to review the locations of the potential selective removal as it relates to this 4(f) resources. It should be noted that when tree removal does occur it will

generally include clearing, without grubbing or grading and will be implemented with minimal soil disturbance (e.g., removal to trees, with retention stumps and undergrowth).

Thank you for your prompt attention to this matter. If you have any questions regarding this project, please feel free to contact me at 518-453-8771 or [jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com) or the CAA Director of Engineering, Robert Bruno at (860) 254-5516 or [rbruno@ctairports.org](mailto:rbruno@ctairports.org).

Sincerely,



Jean Loewenstein, AICP

Senior Planner

Enc.

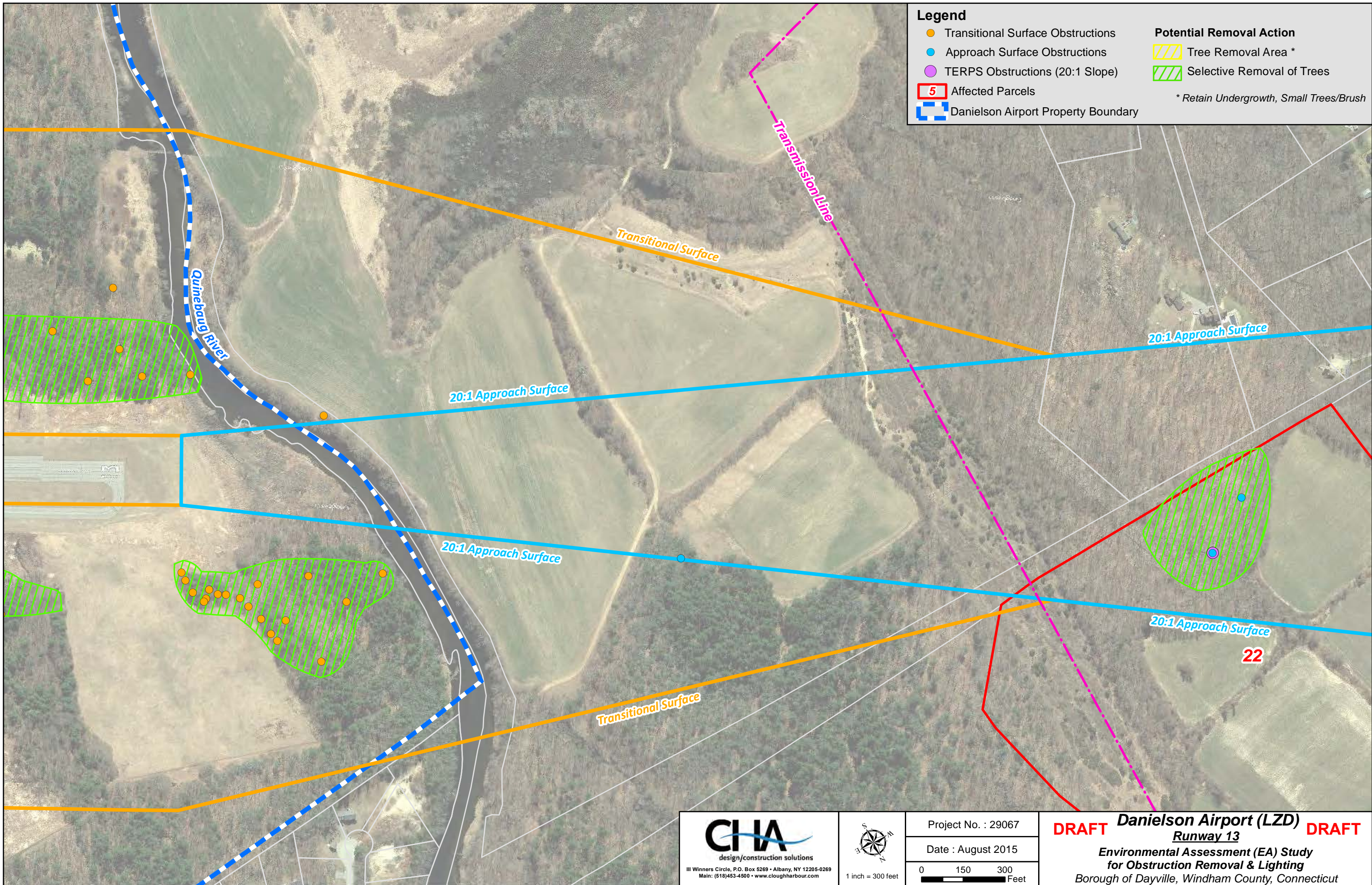
cc: Colin Goegel, Project Manager, CAA  
Robert Bruno, Director of Planning, Engineering and Environmental, CAA  
Kurt Sendlein, Airport Manager

**Legend**

- Transitional Surface Obstructions
- Approach Surface Obstructions
- TERPS Obstructions (20:1 Slope)
- 5 Affected Parcels
- Danielson Airport Property Boundary

**Potential Removal Action**

- Tree Removal Area \*
- Selective Removal of Trees
- \* Retain Undergrowth, Small Trees/Brush



**CIA**  
design/construction solutions  
111 Winners Circle, P.O. Box 5269 • Albany, NY 12205-0269  
Main: (518)453-4500 • www.cloughharbour.com

1 inch = 300 feet

Project No. : 29067  
Date : August 2015

**DRAFT Danielson Airport (LZD) Runway 13 DRAFT**  
**Environmental Assessment (EA) Study for Obstruction Removal & Lighting**  
Borough of Dayville, Windham County, Connecticut







U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

OCT 20 2015

New England Region  
Office of the Regional Administrator

12 New England Executive Park  
Burlington, MA 01803

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Kathleen Knowles  
Tribal Historic Preservation Officer  
Mashantucket Pequot Tribal Nation  
550 Trolley Line Blvd., P.O. Box 3202  
Mashantucket, CT 06338

Dear Ms. Knowles:

**Government-to-Government Consultation Invitation  
Airport Projects at six Connecticut Airports**

The Federal Aviation Administration (FAA), in cooperation with airport owners and operators, is proposing projects at six Connecticut Airports, as outlined herein.

**Purpose of Government-to-Government Consultation**

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," and FAA's Order 1210.20, "American Indian and Alaska Native Tribal Consultation Policy and Procedures," is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA undertakings that uniquely or significantly affect Tribes.

**Consultation Initiation**

With this letter, the FAA is inviting the Mashantucket Pequot Tribal Nation to consult on concerns that may significantly affect your Tribe related to the proposed airport improvements. Early identification of Tribal concerns will allow the FAA and the airport owner and operator to consider ways to avoid, mitigate, or minimize potential impact to Tribal resources and practices as project alternatives are developed and refined.

**Project Information**

The Connecticut Airport Authority proposes to clear trees and install lights around Bradley International Airport, Waterbury-Oxford Airport, Danielson Airport, Hartford-Brainard Airport, Windham Airport and Groton-New London Airport. Enclosed are individual plans showing the location of the areas potentially affected by the proposed clearing and lighting. More detailed plans can be found at the Airport Websites. See the web links below. All the

maps are located under the *project documents* tab. Please let us know if you would like hardcopies of any individual plans.

- <http://bradleyairport.caa-analysis.com>
- <http://waterburyairport.caa-analysis.com>
- <http://hartfordairport.caa-analysis.com>
- <http://danielsonairport.caa-analysis.com>
- <http://grotonairport.caa-analysis.com>
- <http://windhamairport.caa-analysis.com>

### **Confidentiality**

We understand that you may have concerns regarding the confidentiality of the information on areas or resources of religious, traditional, and cultural importance to the tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

### **FAA Contact Information**

Your timely response will assist us in incorporating your concerns into project planning. For that reason, we respectfully request that you contact FAA within thirty days of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these projects.

You may contact FAA's Regional Tribal Consultation Official, Todd Friedenber by telephone at 781-238-7022, or by email at [Todd.D.Friedenberg@faa.gov](mailto:Todd.D.Friedenberg@faa.gov). At that time, the consultation request will be provided to the FAA, Airports Division.

Sincerely,



Amy L. Corbett  
Regional Administrator

Enclosures



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

New England Region  
Office of the Regional Administrator

12 New England Executive Park  
Burlington, MA 01803

OCT 20 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

James Quinn  
Tribal Historic Preservation Officer  
Mohegan Tribe  
13 Crow Hill Rd.  
Uncasville, CT 06382

Dear Mr. Quinn:

### **Government-to-Government Consultation Invitation Airport Projects at six Connecticut Airports**

The Federal Aviation Administration (FAA), in cooperation with airport owners and operators, is proposing projects at six Connecticut Airports, as outlined herein.

#### **Purpose of Government-to-Government Consultation**

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," and FAA's Order 1210.20, "American Indian and Alaska Native Tribal Consultation Policy and Procedures," is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA undertakings that uniquely or significantly affect Tribes.

#### **Consultation Initiation**

With this letter, the FAA is inviting the Mohegan Tribe to consult on concerns that may significantly affect your Tribe related to the proposed airport improvements. Early identification of Tribal concerns will allow the FAA and the airport owner and operator to consider ways to avoid, mitigate, or minimize potential impact to Tribal resources and practices as project alternatives are developed and refined.

#### **Project Information**

The Connecticut Airport Authority proposes to clear trees and install lights around Bradley International Airport, Waterbury-Oxford Airport, Danielson Airport, Hartford-Brainard Airport, Windham Airport and Groton-New London Airport. Enclosed are individual plans showing the location of the areas potentially affected by the proposed clearing and lighting. More detailed plans can be found at the Airport Websites. See the web links below. All the

maps are located under the *project documents* tab. Please let us know if you would like hardcopies of any individual plans.

- <http://bradleyairport.caa-analysis.com>
- <http://waterburyairport.caa-analysis.com>
- <http://hartfordairport.caa-analysis.com>
- <http://danielsonairport.caa-analysis.com>
- <http://grotonairport.caa-analysis.com>
- <http://windhamairport.caa-analysis.com>

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Sincerely,



Amy L. Corbett  
Regional Administrator

Enclosure



STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

**To:** Robert J. Bruno – Director of Planning, Engineering & Environment  
Connecticut Airport Authority, 334 Ella Grasso Turnpike, Windsor Locks

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

**Date:** July 17, 2015      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** Obstruction Removal & Lighting Project

The Department of Energy & Environmental Protection (DEEP) has reviewed the Notice of Scoping for the proposed tree obstruction removal and obstruction lighting beyond airport property in areas surrounding Bradley International Airport and five stated-owned general aviation airports operated by the Connecticut Airport Authority (CAA). The following comments are submitted for your consideration.

In general, the document should:

- Identify the location and height of encroachments into the various applicable airspaces,
- Identify the extent of clearing required,
- Develop plans that, in order, avoid, minimize and mitigate potential impacts,
- Identify alternative site access/egress and staging areas needed to conduct proposed work,
- Evaluate cumulative impacts if project phasing is proposed, and
- Identify opportunities for habitat and outdoor recreational enhancements to mitigate unavoidable impacts.

At four of the airports, the affected areas identified encroach into several DEEP properties that could be impacted if obstruction clearing is proposed at these locations. These include the properties in the table below.

Groton - New London Airport	Bluff Point State Park Bluff Point Coastal Reserve Bluff Point Natural Area Preserve
Windham Airport	Mansfield Hollow Wildlife Management Area Airline State Park Trail Natchaug State Forest Beaver Brook State Park Scenic Reserve
Waterbury - Oxford Airport	Larkin State Park Trail
Brainard Airport	Connecticut River Wildlife Management Area (or Keeney Cove WMA)

The document should identify both direct and indirect (visual or aesthetic) impacts to DEEP property and evaluate the consistency of proposed vegetative clearing or beacon installation with any applicable State policies that apply to the various management designations (e.g., State Park, Coastal Reserve, Natural Area Preserve, etc.). The Department is particularly concerned about potential impacts to Bluff Point.

The Bluff Point peninsula is often considered the last significant undeveloped area on the Connecticut coastline. In 1975, the Connecticut Legislature designated a portion of Bluff Point as a "Coastal Reserve" in recognition of its ecological importance and to preserve its ecological integrity. One of the largest undeveloped coastal areas in the state, this mostly forested 700-acre site contains a variety of habitats supporting state threatened and endangered species. Special Act 76-27 established land use controls at the coastal reserve: "Living and nonliving resources contained within the reserve shall not be disturbed or removed for other than scientific or management purposes and only upon the approval of the commissioner of environmental protection."

The southeast section of Bluff Point is a designated Connecticut Natural Area Preserve. Governor Rowland designated these 117 acres to maintain the preserve in as natural and wild a state as is consistent with the preservation and enhancement of protected resources and educational, biological, geological, paleontological and scenic purposes. The designation is due in part to a unique coastal forest on a concave slope, known as a 'cove forest,' which supports trees that are nearly 100-years old.

Pursuant to section 23-5e of the Connecticut General Statutes (CGS), "An area designated as a natural area preserve is declared to be put to its highest, best and most important use for public benefit and no interest therein owned by the state shall be alienated or put to any use other than as a natural area preserve, except upon a finding by the commissioner in consultation with the natural area preserves committee that (1) such alienation or other use serves a public necessity and that no prudent alternative exists or (2) the features of the land found worthy of preservation have been destroyed or irretrievably damaged so that the public purpose in preserving such land has been frustrated, and after the approval of such proposed alienation or other use by the Governor."

The document should explain any procedures for obtaining variances from FAA regulations or relaxation of requirements regarding penetration by trees or other obstructions into the airspace formed by imaginary surfaces. For example, a Draft Environmental Assessment for removing off-airport airspace obstructions at T.F Green Airport proposed, as the preferred alternative, a partial clear plan for "tree removal only in those areas where trees obstruct priority operational surfaces in order to minimize impacts to the community and environment and to reduce the number of easements to achieve project goals. The priority surfaces were established through a review process conducted by RIAC and FAA and ultimately approved by FAA in the RIAC Airspace Determination." Alternative analysis should evaluate the use of variances or reduced standards in order to avoid adverse impacts at particularly sensitive locations, such as DEEP property.

In the case of Bluff Point, the relative benefit of tree clearing for the lesser used crosswind runway should be weighed against the potential impacts to this particularly sensitive area. Proposals to remove trees at Bluff Point have been the subject of several meetings between

DEEP staff and the CAA with their consultants to discuss minimizing and mitigating impacts of clearing. These efforts should be resumed if it is determined through the NEPA/CEPA process that impacts are unavoidable.

Any proposal that involved DEEP property would entail a need for property rights from the Department. Requests for temporary or permanent property rights from DEEP should be requested using DEEP's Land Management Request Application (copy attached). All such requests are reviewed by a multidisciplinary panel of DEEP staff that comprise the DEEP Property Management Review Team. After the NEPA/CEPA process has identified alternatives that avoid and minimize adverse impact, this review process can identify more specific mitigation measures for any project elements on DEEP property.

The DEEP Natural Diversity Data Base has reviewed the maps depicting the potentially affected areas surrounding the six airports to determine whether there are any 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 in the area. There are records of state listed species within or very close to the boundaries of these areas at five of the airports; there are no records at the Danielson Airport. Lists of these species are attached.

In addition, the Federal Threatened bat species *Myotis septentrionalis* (northern long-eared bat) may be impacted by tree-clearing activities. Additional information on this bat species can be found at: [Long-Eared Bat](#). Consultation with the U.S. Fish & Wildlife Service (FWS) may be required pursuant to Section 7 of the Endangered Species Act. The FWS contact for the northern long-eared bats for New England is Susi von Oettingen: ([Susi\\_vonOettingen@fws.gov](mailto:Susi_vonOettingen@fws.gov)).

Consultations with the NDDDB Program should not be substitutes for onsite surveys required for environmental assessments. Depending on the extent of clearing proposed and the habitats that may be affected, surveys for some of the listed species may be required.

A report summarizing the results of surveys should include:

- survey date(s) and duration,
- site descriptions and photographs,
- list of component vascular plant and animal species within the survey area (including scientific binomials),
- data regarding population numbers and/or area occupied by State-listed species,
- detailed maps of the area surveyed including the survey route and locations of State-listed species,
- statement/resumé indicating the biologist's qualifications, and
- protection or conservation strategies and plans to protect species from project impacts.

The environmental document should include an evaluation of potential impacts to federal and state listed species as well as mitigation measures to protect these species. Based on the information included in the EIE, the NDDDB will re-evaluate species impacts related to these projects.

Please be advised that this is a preliminary review and not a final determination. A more detailed review will be necessary to move forward with any subsequent environmental permit applications submitted to DEEP for the proposed project. Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Existing inland wetlands and watercourses at the sites of proposed clearing should be delineated by a certified soil scientist and their functional values should be evaluated. Any clearing and access roadways should avoid regulated areas to the maximum extent practicable. Unavoidable impacts should be mitigated and buffer areas established to further protect wetlands and watercourses. The degree of impact should be quantified by acreage and a discussion of the functional values that would be lost or impaired should be included in any CEPA document. Because the CAA is a public instrumentality, any work or construction activity within inland wetland areas or watercourses will require a permit from the Inland Water Resources Division (IWRD) pursuant to section 22a-39(h) of the Connecticut General Statutes.

If there are any potential tidal wetlands at sites of proposed clearing, a qualified botanist should delineate regulated areas as defined by section 22a-29(2) of the CGS. Any regulated activity will require a permit from the Office of Long Island Sound Programs pursuant to section 22a-32 of the CGS.

Because the CAA is not a state department, institution or agency, it is not subject to flood management certification pursuant to section 25-68d of the CGS, even if activities are proposed within the 100-year flood zone on the community's Flood Insurance Rate Map.

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects, such as those performed by CAA, disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. The SWPCP must include measures such as erosion and sediment controls and post construction stormwater management. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit. For further information, contact the division at 860-424-3018. A copy



of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

If there are any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD  
Jeff Caiola, DEEP/IWRD  
David Kozak, DEEP/OLISP  
Dawn McKay, DEEP/NDDDB  
Graham Stevens, DEEP/OPPD



June 5, 2015

Ms. Maureen Nicholson, First Selectman  
Town of Pomfret  
5 Haven Road  
Pomfret Center, CT 06259

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal and Lighting  
Connecticut Airport Authority

Dear First Selectman Nicholson:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate Danielson Airport's (Airport) federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential impacts of removing trees and/or installing a pole-mounted red obstruction light in areas that contain airspace obstructions.

To accomplish this, the CAA is conducting an Environmental Assessment (EA) under federal and state regulations to identify affected properties and any potential environmental issues of removing trees and/or installing pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. As more information becomes available it will be posted on the following website: <http://danielsonairport.caa-analysis.com>.

Several properties in the Town of Pomfret have been identified as potentially having an obstruction that penetrates the federally protected airspace. A map identifying the existing tree obstruction areas and a list of affected parcel is enclosed.

The CAA has contracted with the consulting firm of Clough Harbour Associates (CHA) to prepare the required environmental assessment. CHA will be conducting visual reviews of the subject areas. In many instances the field personnel will complete their review from the public right-of-way; however in certain instances personnel may find it necessary to briefly enter private property to observe trees and site conditions with permission from homeowners. These inspections will occur in the spring and summer of 2015. These personnel will all carry proper identification (sample attached).

Should you have any questions or concerns regarding this project, please contact Jean Loewenstein with CHA. She can be reached (518) 453-8771 or via email at [jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com).

Sincerely,

Kevin A. Dillon, A.A.E.  
Executive Director

Enclosure



June 5, 2015

Mr. Richard Ives, First Selectman  
Town of Brooklyn Town Hall  
4 Wolf Den Road  
PO Box 356  
Brooklyn, CT06234

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal and Lighting  
Connecticut Airport Authority

Dear First Selectman Ives:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate Danielson Airport's (Airport) federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential impacts of removing trees and/or installing a pole-mounted red obstruction light in areas that contain airspace obstructions.

To accomplish this, the CAA is conducting an Environmental Assessment (EA) under federal and state regulations to identify affected properties and any potential environmental issues of removing trees and/or installing pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. As more information becomes available it will be posted on the following website: <http://danielsonairport.caa-analysis.com>.

Several properties in the Town of Brooklyn have been identified as potentially having an obstruction that penetrates the federally protected airspace. A map identifying the existing tree obstruction areas and a list of affected parcel is enclosed.

The CAA has contracted with the consulting firm of Clough Harbour Associates (CHA) to prepare the required environmental assessment. CHA will be conducting visual reviews of the subject areas. In many instances the field personnel will complete their review from the public right-of-way; however in certain instances personnel may find it necessary to briefly enter private property to observe trees and site conditions with permission from homeowners. These inspections will occur in the spring and summer of 2015. These personnel will all carry proper identification (sample attached).

Should you have any questions or concerns regarding this project, please contact Jean Loewenstein with CHA. She can be reached (518) 453-8771 or via email at [jloewenstein@chacompanies.com](mailto:jloewenstein@chacompanies.com).

Sincerely,

Kevin A. Dillon, A.A.E.  
Executive Director

Enclosure



June 31, 2015

RE: Danielson Airport  
Environmental Assessment for Obstruction Removal and Lighting  
Affected Property Address:

Dear Property Owner:

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential environmental impacts of tree removal, and selective clearing and/or thinning in areas that contain airspace obstructions.

To accomplish this, the CAA is conducting an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees and/or installing a pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation. A map of the existing tree obstruction areas is included. As more information becomes available it will be posted on the following website: <http://danielsonairport.caa-analysis.com/>.

Your property has been identified as potentially having an obstruction that penetrates the federally protected airspace. As a result of the possible obstruction, the study requires a CAA contractor, Clough Harbour Associates (CHA) to conduct visual reviews of the subject areas. In many instances the field personnel will conduct their review from the public right-of-way; however in certain instances personnel may find it necessary to briefly enter private property to observe trees and site conditions in the summer and fall of 2015. These personnel will all carry proper identification.

Should you have any questions or concerns regarding the field observation, please contact Jean Loewenstein with CHA. She can be reached at (518) 453-8771 or via email at [rloewenstein2@chacompanies.com](mailto:rloewenstein2@chacompanies.com).

Sincerely,

Robert J. Bruno  
Director of Planning, Engineering and Environmental  
Connecticut Airport Authority

# APPENDIX C

## THREATENED AND ENDANGERED SPECIES DOCUMENTATION



# Connecticut Airport Authority - Danielson Airport

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## *IPaC Trust Resource Report*

Generated September 17, 2015 01:11 PM MDT



US Fish &amp; Wildlife Service

# IPaC Trust Resource Report



## Project Description

**NAME**

Connecticut Airport Authority -  
Danielson Airport

**PROJECT CODE**

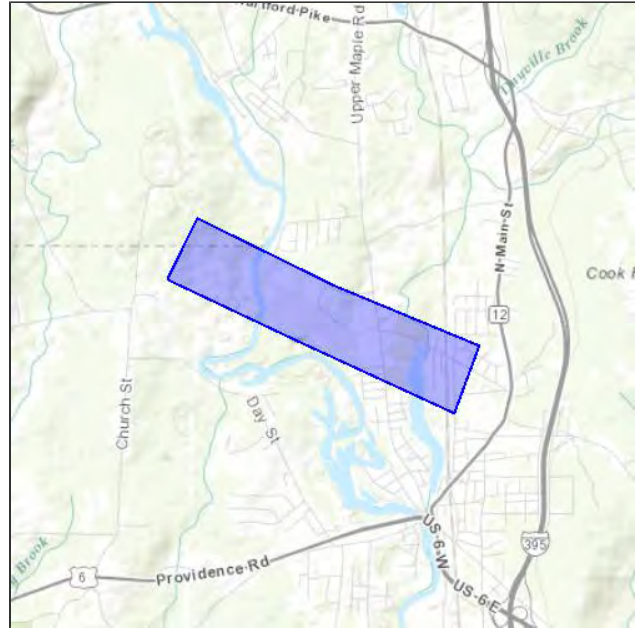
3KZOR-GKJAR-AZPM2-MIS7C-B3GQEY

**LOCATION**

Windham County, Connecticut

**DESCRIPTION**

Environmental Assessment for  
Obstruction Removal and Lighting



## U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

**New England Ecological Services Field Office**

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541



# Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the [Endangered Species Program](#) and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under [Section 7](#) of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

## Mammals

**Northern Long-eared Bat** *Myotis septentrionalis*

**Threatened**

CRITICAL HABITAT

**No critical habitat** has been designated for this species.

<https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=A0JE>

## Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

# Migratory Birds

Birds are protected by the [Migratory Bird Treaty Act](#) and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

<p><b>American Oystercatcher</b> <i>Haematopus palliatus</i>            Season: Breeding  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G8">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G8</a></p>	<b>Bird of conservation concern</b>
<p><b>American Bittern</b> <i>Botaurus lentiginosus</i>            Season: Breeding  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3</a></p>	<b>Bird of conservation concern</b>
<p><b>Bald Eagle</b> <i>Haliaeetus leucocephalus</i>            Year-round  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008</a></p>	<b>Bird of conservation concern</b>
<p><b>Black-billed Cuckoo</b> <i>Coccyzus erythrophthalmus</i>            Season: Breeding  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI</a></p>	<b>Bird of conservation concern</b>
<p><b>Blue-winged Warbler</b> <i>Vermivora pinus</i>            Season: Breeding</p>	<b>Bird of conservation concern</b>
<p><b>Canada Warbler</b> <i>Wilsonia canadensis</i>            Season: Breeding</p>	<b>Bird of conservation concern</b>
<p><b>Fox Sparrow</b> <i>Passerella iliaca</i>            Season: Wintering</p>	<b>Bird of conservation concern</b>
<p><b>Least Bittern</b> <i>Ixobrychus exilis</i>            Season: Breeding</p>	<b>Bird of conservation concern</b>
<p><b>Pied-billed Grebe</b> <i>Podilymbus podiceps</i>            Year-round</p>	<b>Bird of conservation concern</b>
<p><b>Prairie Warbler</b> <i>Dendroica discolor</i>            Season: Breeding</p>	<b>Bird of conservation concern</b>
<p><b>Purple Sandpiper</b> <i>Calidris maritima</i>            Season: Wintering</p>	<b>Bird of conservation concern</b>
<p><b>Short-eared Owl</b> <i>Asio flammeus</i>            Season: Wintering  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD</a></p>	<b>Bird of conservation concern</b>
<p><b>Upland Sandpiper</b> <i>Bartramia longicauda</i>            Season: Breeding  <a href="https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HC">https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HC</a></p>	<b>Bird of conservation concern</b>

**Wood Thrush** *Hylocichla mustelina*

Season: Breeding

**Bird of conservation concern**

**Worm Eating Warbler** *Helmintheros vermivorum*

Season: Breeding

**Bird of conservation concern**

## Refuges

Any activity proposed on [National Wildlife Refuge](#) lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

Refuge data is unavailable at this time.

# Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate [U.S. Army Corps of Engineers District](#).

## DATA LIMITATIONS

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

## DATA EXCLUSIONS

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

## DATA PRECAUTIONS

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Wetland data is unavailable at this time.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Federal Aviation Administration  
New England Region

12 New England Executive Park  
Burlington, MA 01803

December 6, 2016

Thomas Chapman  
U.S. Fish and Wildlife Service  
New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301

Dear. Mr. Chapman:

The Connecticut Airport Authority proposes the removal of trees in the vicinity of several airports, in an effort to promote safe use of these airports. The Federal Aviation Administration may fund these tree removal projects.

The FAA has determined the tree clearing project is unlikely to adversely affect the northern long-eared bat (*Myotis septentrionalis*), and submits the attached Streamline Consultation Forms for USFWS review.

Please do not hesitate to contact this office if you have any questions on this matter. Thank you.

Sincerely,

Richard P. Doucette  
Manager of Environmental Programs  
FAA New England Region, Airports Division

## Northern Long-Eared Bat 4(d) Rule Streamlined Consultation Form

Federal agencies should use this form for the optional streamlined consultation framework for the northern long-eared bat (NLEB). This framework allows federal agencies to rely upon the U.S. Fish and Wildlife Service’s (USFWS) January 5, 2016, intra-Service Programmatic Biological Opinion (BO) on the final 4(d) rule for the NLEB for section 7(a)(2) compliance by: (1) notifying the USFWS that an action agency will use the streamlined framework; (2) describing the project with sufficient detail to support the required determination; and (3) enabling the USFWS to track effects and determine if re-initiation of consultation is required per 50 CFR 402.16.

This form is not necessary if an agency determines that a proposed action will have no effect to the NLEB or if the USFWS has concurred in writing with an agency's determination that a proposed action may affect, but is not likely to adversely affect the NLEB (i.e., the standard informal consultation process). Actions that may cause prohibited incidental take require separate formal consultation. Providing this information does not address section 7(a)(2) compliance for any other listed species.

<b>Information to Determine 4(d) Rule Compliance:</b>	<b>YES</b>	<b>NO</b>
1. Does the project occur wholly outside of the WNS Zone <sup>1</sup> ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Have you contacted the appropriate agency <sup>2</sup> to determine if your project is near known hibernacula or maternity roost trees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Could the project disturb hibernating NLEBs in a known hibernaculum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Could the project alter the entrance or interior environment of a known hibernaculum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Does the project remove any trees within 0.25 miles of a known hibernaculum at any time of year?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Would the project cut or destroy known occupied maternity roost trees, or any other trees within a 150-foot radius from the maternity roost tree from June 1 through July 31.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

You are eligible to use this form if you have answered yes to question #1 **or** yes to question #2 **and** no to questions 3, 4, 5 and 6. The remainder of the form will be used by the USFWS to track our assumptions in the BO.

### **Agency and Applicant<sup>3</sup>**

*Mr. Richard Doucette, Environmental Program Manager, Airports Division*

*USDOT Federal Aviation Administration – New England Region*

*(781) 238-7613*

*richard.doucette@faa.gov*

<sup>1</sup> <http://www.fws.gov/midwest/endangered/mammals/nleb/pdf/WNSZone.pdf>

<sup>2</sup> See <http://www.fws.gov/midwest/endangered/mammals/nleb/nhisites.html>

<sup>3</sup> If applicable - only needed for federal actions with applicants (e.g., for a permit, etc.) who are party to the consultation.

**Project Name:** Danielson Airport Tree Obstruction Removal

**Project Location:** Killingly, CT 41° 49' 11" N 071° 54'04" W

**Basic Project Description** (provide narrative below or attach additional information):

*The proposed action includes removal of trees on and surrounding the Danielson Airport that penetrate the federally-defined airport airspace. The project included an alternative evaluation to determine the critical areas of tree removal necessary to maintain a safe operating environment. The proposed removal includes both tree clearing and selective thinning of tall trees, with retention of stumps and undergrowth. For the purposes of this form, all areas of removal will be included in the estimate of 'forest conversion'. The tree obstructions removal at the Danielson Airport includes approximately 52 acres. These estimates are conservative; it is likely the final acreage of forest conversion will be less.*

*All removals will occur between December and March; there is no forest conversion between April through October or June through July.*

*All removals are for safety purposes and to satisfy Federal Aviation Administration (FAA) standards. None of these removals are for the purposes of timber harvest.*

<b>General Project Information</b>	<b>YES</b>	<b>NO</b>
Does the project occur within 0.25 miles of a known hibernaculum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the project occur within 150 feet of a known maternity roost tree?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the project include forest conversion <sup>4</sup> ? (if yes, report acreage below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Estimated total acres of forest conversion	52 acres	
If known, estimated acres <sup>5</sup> of forest conversion from April 1 to October 31	0 acres	
If known, estimated acres of forest conversion from June 1 to July 31 <sup>6</sup>	0 acres	
Does the project include timber harvest? (if yes, report acreage below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Estimated total acres of timber harvest		
If known, estimated acres of timber harvest from April 1 to October 31		
If known, estimated acres of timber harvest from June 1 to July 31		
Does the project include prescribed fire? (if yes, report acreage below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Estimated total acres of prescribed fire		
If known, estimated acres of prescribed fire from April 1 to October 31		
If known, estimated acres of prescribed fire from June 1 to July 31		
Does the project install new wind turbines? (if yes, report capacity in MW below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Estimated wind capacity (MW)		

Agency Determination:

By signing this form, the action agency determines that this project may affect the NLEB, but that any resulting incidental take of the NLEB is not prohibited by the final 4(d) rule.

If the USFWS does not respond within 30 days from submittal of this form, the action agency may presume that its determination is informed by the best available information and that its project

<sup>4</sup> Any activity that temporarily or permanently removes suitable forested habitat, including, but not limited to, tree removal from development, energy production and transmission, mining, agriculture, etc. (see page 48 of the BO).

<sup>5</sup> If the project removes less than 10 trees and the acreage is unknown, report the acreage as less than 0.1 acre.

<sup>6</sup> If the activity includes tree clearing in June and July, also include those acreage in April to October.



responsibilities under 7(a)(2) with respect to the NLEB are fulfilled through the USFWS January 5, 2016, Programmatic BO. The action agency will update this determination annually for multi-year activities.

The action agency understands that the USFWS presumes that all activities are implemented as described herein. The action agency will promptly report any departures from the described activities to the appropriate USFWS Field Office. The action agency will provide the appropriate USFWS Field Office with the results of any surveys conducted for the NLEB. Involved parties will promptly notify the appropriate USFWS Field Office upon finding a dead, injured, or sick NLEB.

Signature: \_\_\_\_\_

Date Submitted: \_\_\_\_\_



## **APPENDIX D PUBLIC MEETING SUMMARY**



**PUBLISHER'S CERTIFICATE**

State of Connecticut,

ss. Norwich

County of New London,

On this 14<sup>th</sup> day of **February** 2017

personally appeared before the undersigned, a Notary Public, within and for said County and State

**Jim Coletti, Proof of Publication**

of the "THE BULLETIN" a daily newspaper published at Norwich, County of New London, State of Connecticut, who, being duly sworn, states on oath that

**LEGAL NOTICE**

**Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Notice of Public Information Meeting**

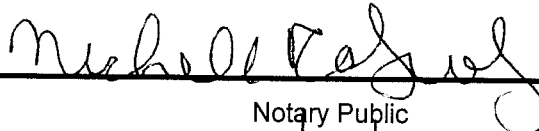
a true copy of which is hereto annexed, was published in said newspaper in its issue of the

**13th** day of **February** 2017



Subscribed and sworn to before me this 14 day

of February A.D. 2017



Notary Public

My Commission Expires 9/30/2020

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**AFFIDAVIT OF PUBLICATION**  
STATE OF CONNECTICUT (ss. Putnam)  
COUNTY OF WINDHAM

I, Kiyara Bissette, of the Town of Thompson, County of Windham, and State of Connecticut, being duly sworn, depose and say that I am an agent for the Shopper-Turnpike Corp., publishers of the Shopper's Guide and the Turnpike Buyer, weekly goods and services advertising publications, published in the Town of Putnam, and having a circulation within the Town of Danielson, County of Windham and State of Connecticut, and that a notice ordered by the Superior Court of the Judicial District of Windham has been duly published in the Shopper's Guide and Turnpike Buyer on Wednesday February 8, 2017, and that a true copy of that notice is attached hereto.

Signed Kiyara Bissette

Subscribed and sworn to, before me, this 10 day of February.

Wilbur D. Neumann  
Wilbur D. Neumann  
Notary Public



# The Woodstock Academy Job Posting

## CAMPUS SAFETY/SECURITY TEN MONTH POSITION

The successful candidate will:

- Promote 21st century educational excellence through the vigorous support of the mission and goals of The Woodstock Academy; and
- Facilitate individual, departmental, and school excellence through the support of high quality personnel, reinforcement of best instructional practices, encouragement of a culture of collaboration, and a focus on student learning.

Minimum qualifications:

- Strong professional ethics and boundaries;
- Experience working with students preferred;
- Law enforcement or security experience preferred;
- Ability to obtain CT drivers' license with public passenger endorsement;
- Strong interpersonal skills;
- Ability to work independently;
- Ability to work a variety of hours with some mandatory overtime;
- Demonstrated excellence in human relations;
- Any combination of experience, training, aptitude, or education which provides the required skills, abilities, and professional maturity;
- Positive attitude, integrity, collaboration skills, cooperative attitude, and a sense of humor essential; and
- Applicant must pass a background check.

Submit employment application, letter of interest, resume, three letters of recommendation, and transcripts to:

The Woodstock Academy  
Mrs. Lori Wajer, Director of Human Resources  
57 Academy Road  
Woodstock, CT 06281  
lwajer@woodstockacademy.org

Closing date: Until position is filled

Please visit our website, [www.woodstockacademy.org](http://www.woodstockacademy.org), to print a copy of our Employment Application.

DE

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EMAIL: [ads@shopperturnpike.com](mailto:ads@shopperturnpike.com)

**DANIELSON:** Large one bedroom condo in eight unit complex Near Rt. 6 & 395. Stove, refrigerator, dishwasher, W/D, full bath Rent \$695. Utilities averaged \$135. Prefer no pets or smoking. First, last, security. 774-392-3182. Lorenzen@Bridgew.edu. \*ST02-15

**FREE JUNK CAR AND TRUCK REMOVAL:** Cash paid, depending on year, make and model. Call Dave from Foster. 401-487-6091. \*ST02-08

**"LAMB LOVERS DELIGHT"** Enjoy a delicious lamb chop dinner with full salad bar at the Yantic River Inn on Wednesday & Thursday evenings from 4:00 to 8:30pm. \$19.95 dinner. Call the Inn at 860-887-4300 for reservations & particulars. ST02-08

**\$100-\$500 CASH PAID:** For junk cars & trucks. Call Dave 860-756-6551. \*ST

**FOR RENT - MOOSUP:** Modern 2 bedroom. \$730 + sec. Call for details. 860-564-3706 \*T@TF

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LOOK TO YOUR FUTURE...LOOK TO THE WOODSTOCK ACADEMY!!!

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Putnam Chrysler Dodge Jeep Kia is growing and business is great!

As a result we need to expand our  
**Service Technician Staff**

We have immediate openings for Service Technicians. Just have Tech School and/or some experience. Nice working environment. **Position requires only 1 night and 1 Saturday a month.**

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Competitive pay, company paid Life Insurance, 401k Plan, subsidized Medical and short term disability. We also offer Dental, Long Term Disability and paid time off.

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ST

# VALENTINE'S DAY

TUES, FEB 14TH

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FRESH FRAGRANT FLOWERS,  
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~ OPEN SUNDAY FEB 12 & OPEN 7AM, FEB 14 - DELIVERING ALL DAY ~

**AARP MEETING:** Senexet Grange #40, Route 169, Woodstock, Ct. Wednesday, February 8, 2017 at noon. \*\*\*ST

**FOR RENT:** House trailer, 3 bedroom in Pomfret, CT. \$925 per month. Call Dave Gratton at 860-377-0999. ST003-15

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## Recruit Registration

Natchaug River Young Marines

awarded

2015 National Young Marine Unit of the Year, 2015 Director's Cup

"Be part of the country's best Young Marine unit"

February 13, 16 & 22, 2017 - 6pm till 8pm

February 18, 2017 - 9am till 12pm

Location:

**Suez** (formerly United Water)

(across from Friendly Spirits)

31 Wauregan Road • Danielson, CT 06239

February 21, 2017 - 6pm till 8pm

Location:

**East Killingly Fire Department**

1395 Hartford Pike • East Killingly, CT 06243

Recruit enrollment fee \$50 deposit/pp  
Please bring child's birth certificate & social security card for verification purposes.

Child must be present at time of registration.

**For more information: 860-779-0041**

[www.NatchaugRiverYoungMarine.com](http://www.NatchaugRiverYoungMarine.com)



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## VALENTINE DINNER DANCE

Sat., February 11th, 2017 - 5:00 pm-11:00 pm

**AMERICAN LEGION POST 67**

Rt. 200, Grosvenordale, CT

Pasta Dinner, DJ & Raffles • Cash Bar • Donation \$10.00 per person

Proceeds to benefit American Legion and Homeless Veterans Home

Donations of personal care items, socks, coats and warm clothing will be accepted

For tickets, contact John 860-336-6132, Jessica 860-481-0109  
or Betty 860-315-7739

Tickets also available at the door and at Legion Post 67 Bar  
860-923-9203

**WANTED:** Used garage door, 8 ft. wide x 7 ft. tall. Please call 860-974-1012. Leave message. All calls will be returned. #ST

**ESTATE SALE:** 16 Charlton Rd, Dudley, MA - Sat., February 11th, 9:00am-3:00p. Inclement weather date, February 18th. #ST@

## Thompson Congregational Church, UCC

will be holding

**Sunday Services at**

**Marianapolis Prep School's Chapel**

**at 9:00 a.m.**

**until further notice.**

*Please join us to see  
what we have planned  
for 2017.*





# The Bulletin

www.NorwichBulletin.com

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## Payment Information

Total Order Price: \$320.94

Payment Type: MasterCard- Payway | Exp:

Auth 013406



**PUBLISHER'S CERTIFICATE**

State of Connecticut,

ss. Norwich

County of New London,

On this 14<sup>th</sup> day of **February** 2017

personally appeared before the undersigned, a Notary Public, within and for said County and State

**Jim Coletti, Proof of Publication**

of the "THE BULLETIN" a daily newspaper published at Norwich, County of New London, State of Connecticut, who, being duly sworn, states on oath that

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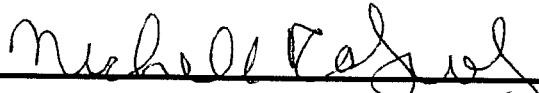
a true copy of which is hereto annexed, was published in said newspaper in its issue of the

**13th** day of **February** 2017



Subscribed and sworn to before me this 14 day

of February A.D. 2017



Notary Public

My Commission Expires 9/30/2020

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- Ability to work independently;
- Ability to work a variety of hours with some mandatory overtime;
- Demonstrated excellence in human relations;
- Any combination of experience, training, aptitude, or education which provides the required skills, abilities, and professional maturity;
- Positive attitude, integrity, collaboration skills, cooperative attitude, and a sense of humor essential; and
- Applicant must pass a background check.

mit employment application, letter of interest, resume, three letters of recommendation, and transcripts to:

The Woodstock Academy  
Mrs. Lori Wajer, Director of Human Resources  
57 Academy Road  
Woodstock, CT 06281  
lwajer@woodstockacademy.org

ing date: Until position is filled

visit our website, [www.woodstockacademy.org](http://www.woodstockacademy.org), to print a copy of our Employment Application.

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EMAIL: [ads@shopperturnpike.com](mailto:ads@shopperturnpike.com)

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## Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal Notice of Public Information Meeting

NOTICE IS HEREBY GIVEN that the Connecticut Airport Authority (CAA) will be holding a Public Information Meeting for the Danielson Airport Environmental Assessment and Environmental Impact Evaluation for Obstruction Removal. At this meeting, information on the overall project and the study's findings, including the Preferred Alternative, will be presented. The meeting will be held on Thursday, February 23rd at Killingly Town Hall in the Town Meeting Room (172 Main Street, Killingly, CT 06239). In case the meeting is canceled due to snow, a secondary date for the meeting will be held on Wednesday, March 8th, 2017. The doors open at 6:30PM with the presentation beginning at 7:00PM. The Environmental Assessment for Tree Clearing will be available at <http://danielsonairport.caa-analysis.com/>.



(860) 887-9211 • 66 Franklin Street, Norwich, CT 06360

**Advertising Fax:** 860-887-1949

## PROOF

**Account Number:** 40015085

**Order Number:** 00226031

**Salesperson:** Coletti | **Printed on:** 1/10/2017

**Telephone:** | **Fax:**

STEPHANIE PARSONS  
CHA CONSULTING  
3 WINNERS CIRCLE  
ALBANY, NY 12205  
(518)453-4500

**Title:** Norwich Bulletin | **Class:** 900 Legals

**Start date:** 2/6/2017 | **Stop date:** 2/13/2017 |

**Insertions:** 2 | **Lines:** 30.17 ag

### LEGAL NOTICE

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Impact Evaluation for Obstruction Removal  
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## Payment Information

**Total Order Price:** \$320.94

**Payment Type:** | **Exp:**



(860) 887-9211 • 66 Franklin Street, Norwich, CT 06360

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## Receipt

**Account Number:** 40015085

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## Payment Information

**Total Order Price:** \$320.94

**Payment Type:** MasterCard- Payway | **Exp:**

Auth 013406





**PUBLIC INFORMATION MEETING SUMMARY**

Project: Environmental Assessment (EA) & Environmental Impact Evaluation (EIE) for Obstruction Removal – Danielson Airport (LZD)  
Location: Killingly Town Hall-Town Meeting Room  
Meeting: Public Information Meeting  
Date: February 23, 2017 – 6:30 p.m.

**Summary:**

A public information meeting (PIM) for the Environmental Assessment & Environmental Impact Evaluation for Obstruction Removal was held at the Killingly Town Hall-Town Meeting Room on February 23, 2017 – 6:30 p.m. The meeting presentation outlined the overall purpose of the EA and EIE, which is to promote safety by bringing the airport into compliance with Federal Aviation Administration (FAA) design standards and regulations regarding clear airspace as well as the process of identifying and evaluation potential obstructions. The study documents potential impacts of tree obstruction removal, includes trees both on and off the airport, satisfies the requirements of the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) and is consistent with applicable FAA guidance. Meeting attendees were also briefed on the upcoming RW 18-36 reconstruction project.

There were approximately 13 persons in attendance, including the following representatives of the Connecticut Airport Authority, Danielson Airport, and CHA Consulting.

Attendee	Affiliation
Molly Parsons	Connecticut Airport Authority
Paul McDonnell	CHA Consulting

The following is a summary of comments and questions discussed during the meeting:

Q1: When was the survey work completed?

A1: Survey work was completed in 2010

Q2: When was the last tree removal completed?

A2: Last tree removal was completed in 2013 and included location on airport property.

Q3: Do you ever participate in replanting; I don't see that in the report?

A4: Re-plantings are generally not permitted or eligible for funding by the FAA, unless required to meet a permit or ordinance requirement. Re-planting would be considered if necessary; however, at airports, open fields are generally a preferred land use over forested areas.

Q4: A question was asked if the homeowner could use their own arborist

A4: It was noted that a contractor would be hired through the state procurement process and it would be bid out.

Q5: A question was asked if the homeowner could use their own arborist

A5: It was noted that a contractor would be hired through the state procurement process and it would be bid out.

Q6: The Town (David Griffiths) asked that a Checklist be provided to him and residents with all the rights and requirements for private property owners.

A6: It was noted that could be done as part of the next steps.

Q7: There was an increased concern regarding the height of the powerlines at the 31 end. It was noted that they should be illuminated or should have balloon markers on them so that incoming pilots can see them now that the tree buffer is removed.

A7: Consultant noted that while the powerlines were not identified as an obstruction it is something that can be reviewed.

Q8: There was a concern that if additional trees are removed that it will no longer block the wind in the winter months, not only for residents but also for incoming pilots

A8: For pilots, in general unobstructed wind conditions are preferred over variable wind or turbulence that may be created by trees.

Q9: There was a suggestion to have a list of all negotiable options when talking with property owners.

A9: A few topics were suggested such as; letting the owner know that they have the option to keep the wood or not, allowing them to negotiate the way the property is left once the clearing is complete (seeding, stumping etc.), outlining pros and cons to the easement process. It is possible that tree clearing on private property could be completed with a temporary access agreement with the property owner. However, the FAA prefers airports to purchase a permanent easement so that the obstruction removal rights are indefinite.

Q10: A One question was asked if the homeowner could use their own arborist

A10: It was noted that a contractor would be hired through the state procurement process and the tree removal would be publicly bid. However, as part of the access or easement negotiations, a property owner's arborist may be consulted.

Q11: There was also a clarification to who owns the Airport the CAA or the State and who is paying for this project.

A11: The airport ownership was transfer from the CTDOT to the Connecticut Airport Authority (CAA). CAA owns and operates Danielson, and five other airports in CT. Danielson Airport is eligible for 90% federal funding through the FAA for airport improvements such a tree obstruction removal. This EA study is funded by both FAA and CAA (90%/10%). It is anticipated that easements and removal would also be funded in this manner.



Q12: There was a question regarding insurance should something happen who would be responsible for insurance

A12: The selected contractor would be required to provide its adequate property and liability own insurance.

### **General Comments**

C1: If there is replanting it was stressed that it should be natural and native flora, in the past the utility companies have cleared areas and now invasive grow in that location.

C2: The Town (David Griffiths) wants Spherical Markers added to the Power lines on Maple Street (Runway 31 approach). General discussion on easements, methods of tree removal on private property, informal agreements for tree removal w/o easements, time of year, etc.

# Sign-In Sheet (Public Information Meeting)



PROJECT: Environmental Assessment & Environmental Impact Evaluation for Obstruction Removal at Danielson Airport  
 LOCATION: Killingly Town Hall-Town Meeting Room  
 DATE: 02/23/2017

Name	Affiliation	Phone Number	Email (print clearly)
Kerry Griffin	westfield cemetery	860-372-9893	
Annmarie Aubrey	Town of Killingly	860-779-5313	aubrey@killinglyt.gov
<del>Donna B...</del>			
Timothy Corinne Billings	Maryland St.	860-428-5814	t.m.bollinger67@gmail.com
Doris Taha	Holy Cross Seminary St. James Church	860-774-3900	
Paul Gordon	Holy Cross Seminary St. James Church	860-774-7080	
Teise Coffey	Hartford Courant Community News	860-719-3832	dcoffey@courant.com
David A. Griffiths	Town of Killingly	860-774-0321	←
Sylvia Mauseux	Maryland St	860-774-3877	

# Sign-In Sheet (Public Information Meeting)



PROJECT: Environmental Assessment & Environmental Impact Evaluation for Obstruction Removal at Danielson Airport  
 LOCATION: Killingly Town Hall-Town Meeting Room  
 DATE: 02/23/2017

Name	Affiliation	Phone Number	Email (print clearly)
Mary Reardon	home owner	(860) 774-2815	mdejaridin@SNET.net
Paul Phillips		860 634 6457	
Kelly Dery	home owner	860-428-7635	Kdery78@yahoo.com
KOLANOS ELKEI	Home own wife	860-774-0772	
Mary Handabaki	home owner	(860) 792-1266	mgrandelski@sbcglobal.net

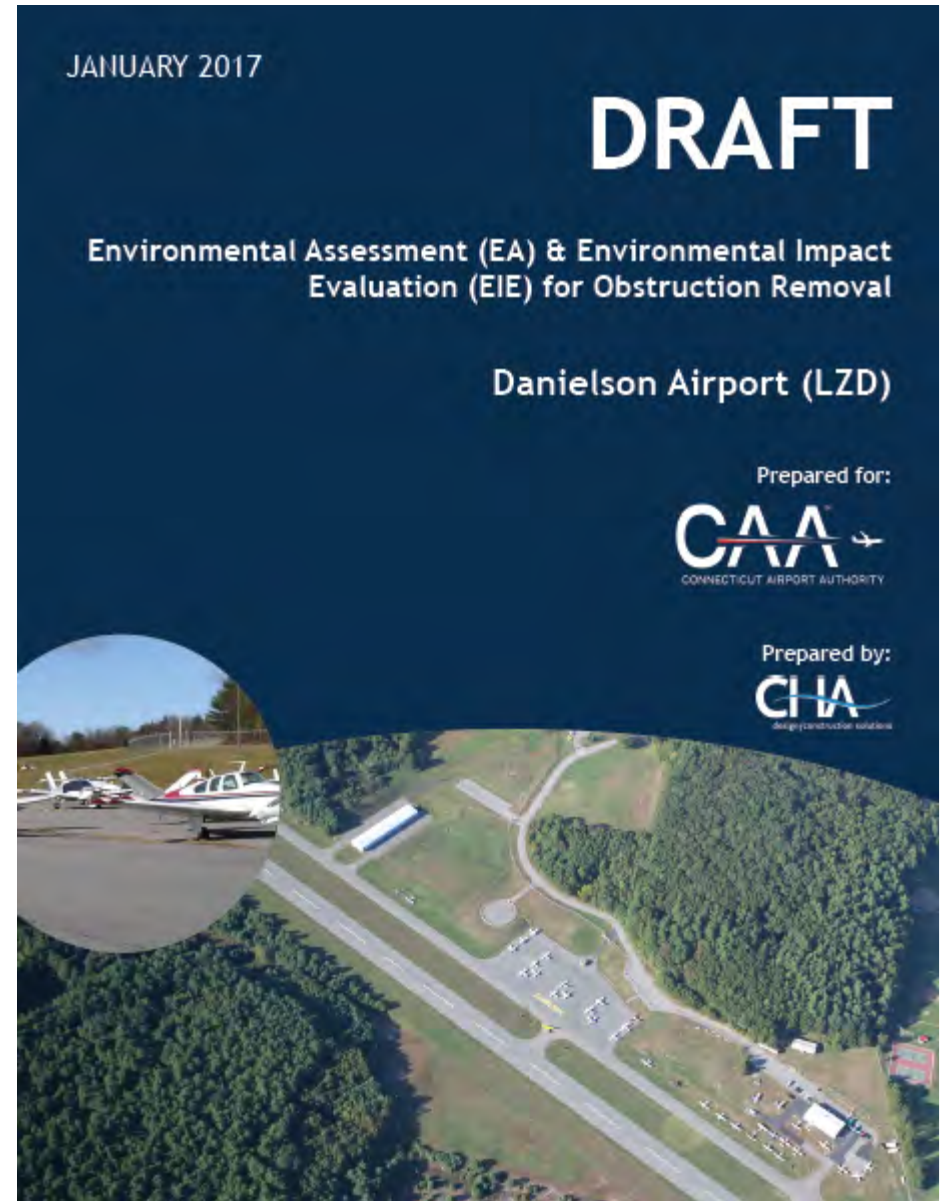
# Danielson Airport (LZD)

## Environmental Assessment for Tree Obstruction Removal



# ***Draft Environmental Assessment Report for Danielson Airport***

*January 2017*



# Public Meeting Outreach

- Required notice in CT Environmental Monitor
- Required Newspaper Legal Advertisements (multiple)
- Listed on Study Website
- Outreach to Town Killingly and surrounding Towns.
- Letters sent to potential affected Property Owners.

<http://danielsonairport.caa-analysis.com/>

<http://www.ct.gov/ceq/site/default.asp>



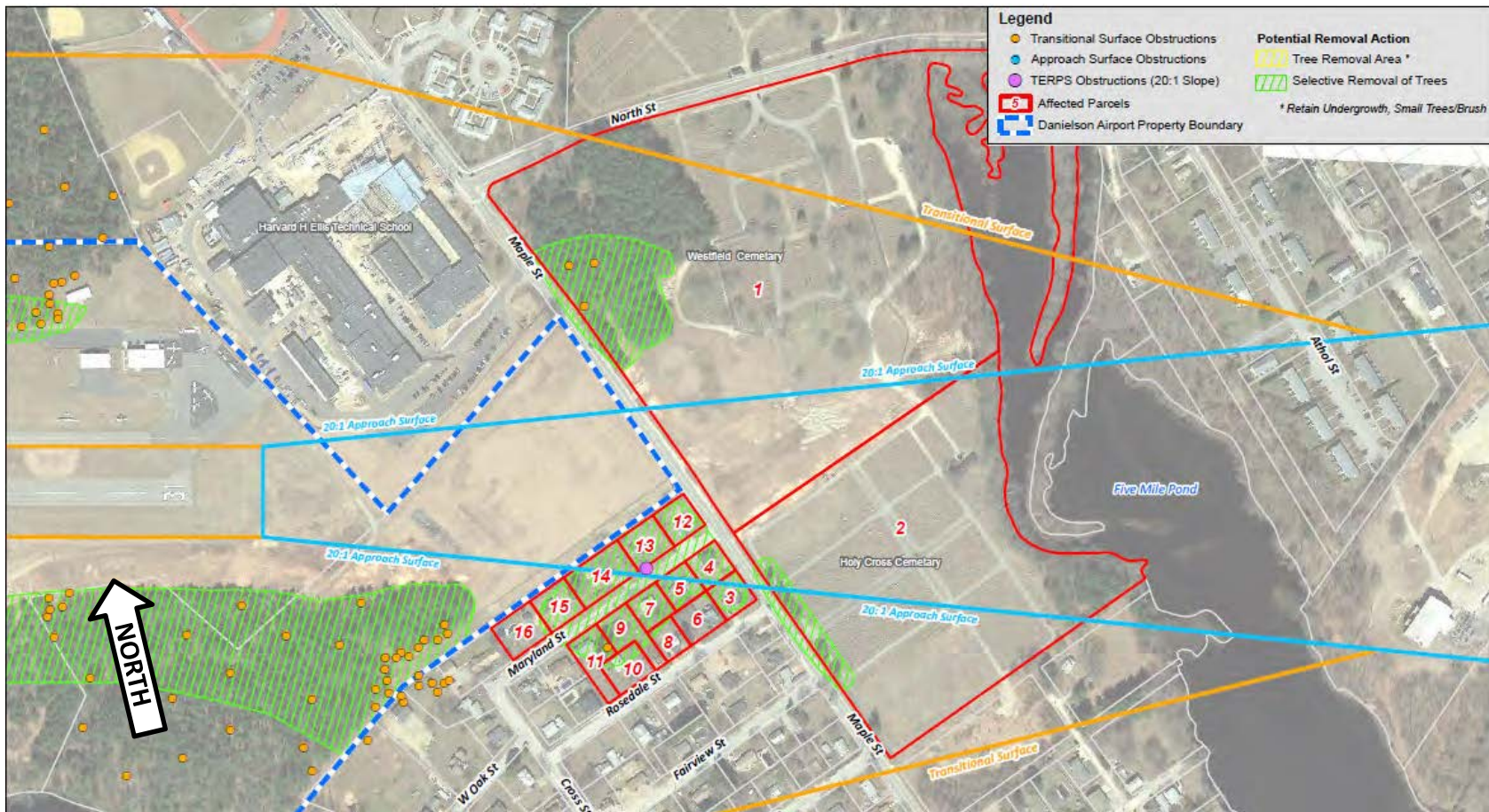
# Project Background

- The Environmental Assessment (EA) documents the potential impacts of tree obstruction removal at Danielson Airport
- Include trees located on and off airport property
- Study satisfies both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA)
- Required *'First Step'* in the process
- Consistent with FAA guidance:
  - Order 1050.1F – Environmental Impacts: Policies and Procedures
  - Order 5050.4B – NEPA Implementing Instructions for Airport Actions



# Project Background

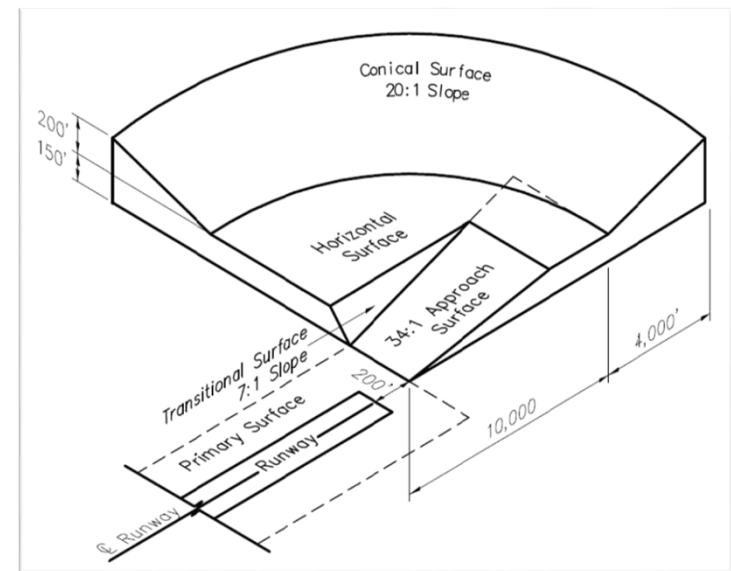
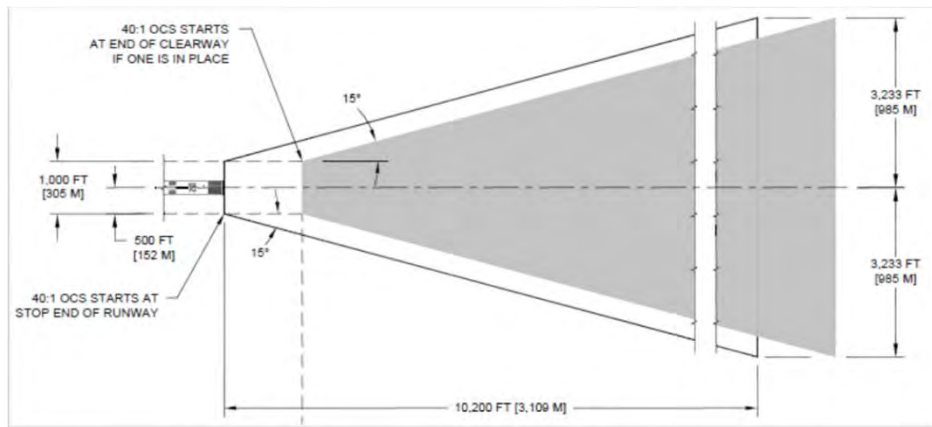
- EA includes both on and off-airport obstruction removal





# Project Background

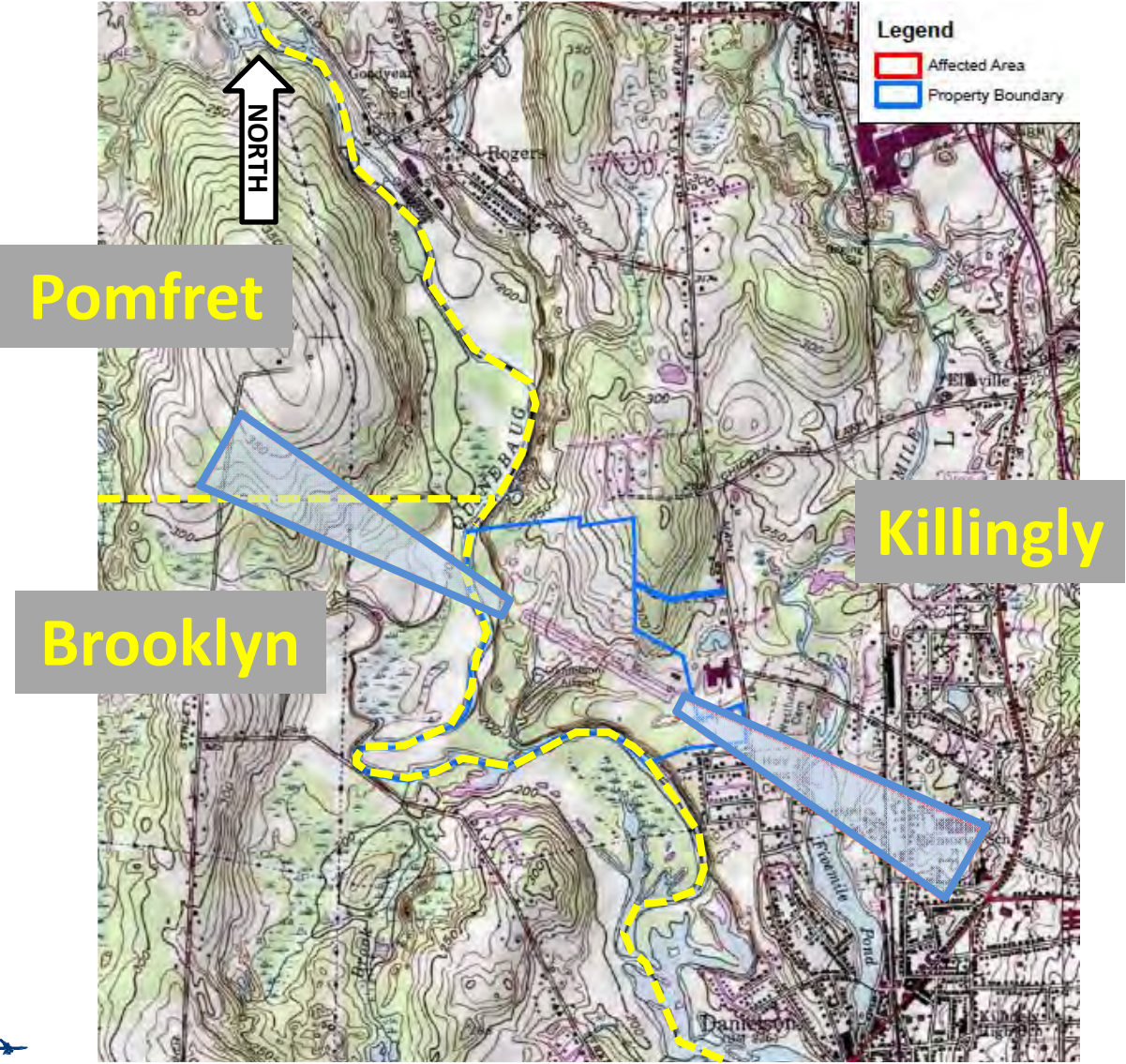
- Objects that penetrate the defined airspace are classified as obstructions, and should be removed to safely accommodate aircraft operations
- The EA addresses tree removal associated with:
  - **Federal (i.e., FAR Part 77) Navigable Airspace**
  - **FAA Design Standards**



# Project Background



# Project Background



# Purpose and Need

- Purpose:
  - Improve airport safety by removing tree obstructions (compliance with FAA design standards).
- Need:
  - FAA has established airspace and design criteria to provide for safe aircraft operations.
  - The 2012 airspace analysis identified existing safety deficiencies.
  - **The Airport is required to address the safety deficiencies to the extent feasible.**



# Alternatives Analysis and Proposed Action

- No Action Alternative
- Full Obstruction Removal Alternative
- Modified Obstruction Removal Alternative



# No Action Alternative

Goal(s): This option minimizes environmental impacts as it takes no action to remove, lower, mark, or mitigate existing or potential future airspace obstructions.

Description: Tree obstructions have been identified beyond both runway ends, Transitional Surface areas, and the outer airspace of the Horizontal and Conical Surfaces. These presumed hazards would remain in place, and potentially increase in size and penetration with additional tree growth.

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• No wetland impacts (temporary or permanent)</li> <li>• No impacts to biological resources, habitats, or species of concern</li> <li>• No impacts to parks or recreation</li> <li>• No impacts or disturbance to property owners</li> <li>• No project costs</li> </ul>	<ul style="list-style-type: none"> <li>• Retains potential hazards to airport users</li> <li>• Retains a potential hazard to people and property on the ground surrounding the airport</li> <li>• Does not comply with FAA design standards or grant assurances</li> <li>• Risks future FAA funding for improvements to the airport</li> </ul>

# Full Obstruction Removal Alternative

Goal(s): This option removes all penetrations to the FAR Part 77 Approach and Transitional Surfaces, with obstruction lighting for the Horizontal and Conical Surfaces.

Description: A comprehensive removal of obstructions to the inner airspace surfaces, including substantial areas off-airport property. This alternative provides maximum benefit to airport users and safety enhancement. Outer surfaces are protected with lighting during nighttime operations.

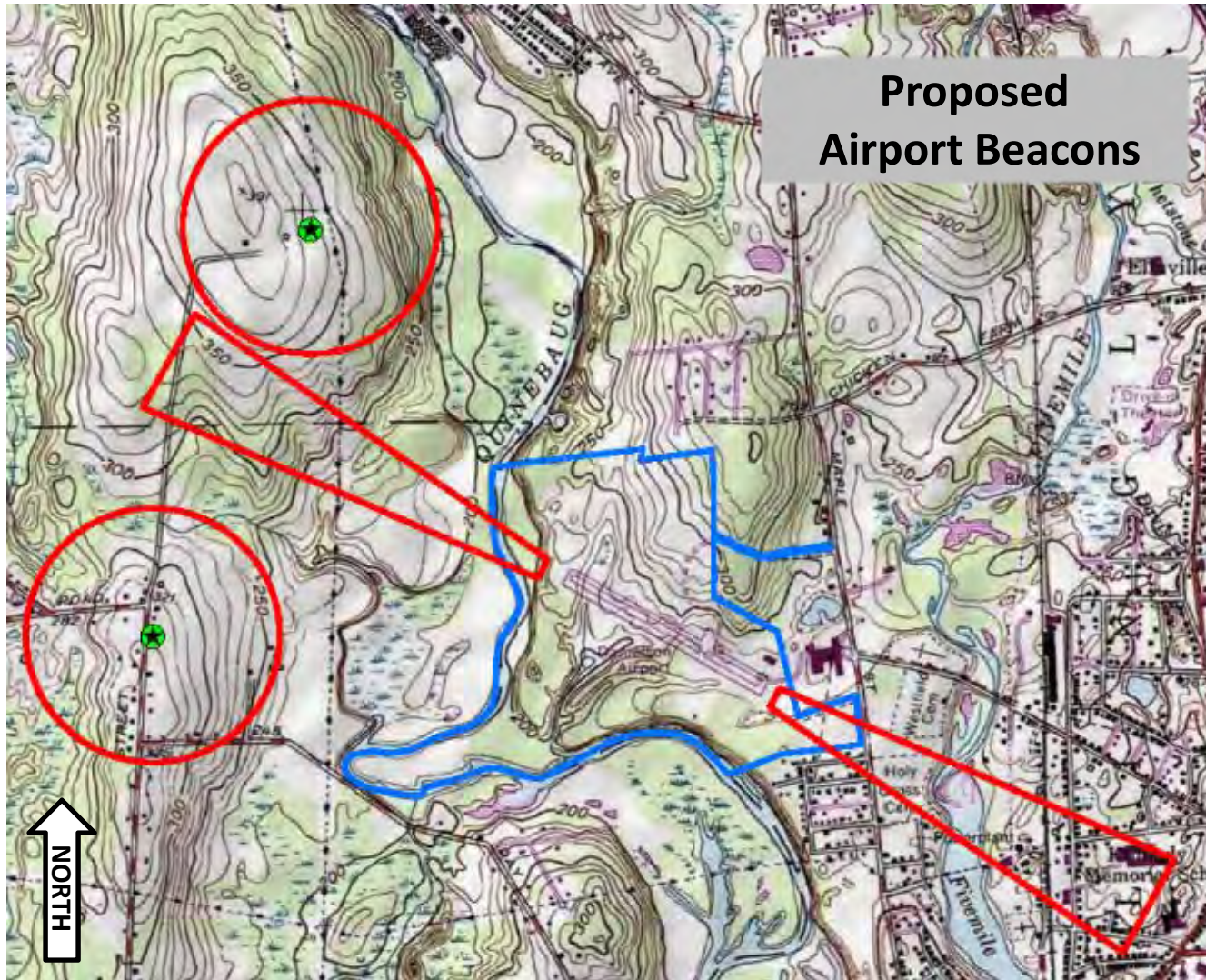
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Clears or lights virtually all defined aeronautical surfaces</li> <li>• Satisfies federal design standards and assurances</li> <li>• Comprehensive removal of potential hazards to airport users</li> <li>• Improves safety for people and property on the ground surrounding the airport</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for impacts to wetlands (temporary or permanent)</li> <li>• Potential impacts to biological resources</li> <li>• Substantial coordination and negotiation needed with property owners</li> <li>• The need for numerous avigation easements may prevent successful completion of project and significantly extend the required schedule</li> <li>• High project costs</li> <li>• Successful completion is questionable</li> </ul>

# Full Obstruction Removal Alternative





# Full Obstruction Removal Alternative



# Modified Obstruction Removal Alternative

Goal(s): This option removes penetrations to the FAA Threshold Surface in off-airport locations (and to FAR Part 77 Approach and Transitional Surfaces on-airport)

Description: A reduced removal alternative intended to clear the critical penetrations to the runway approaches to maintain operational safety, while minimizing the impact to off-airport properties and the natural environment.

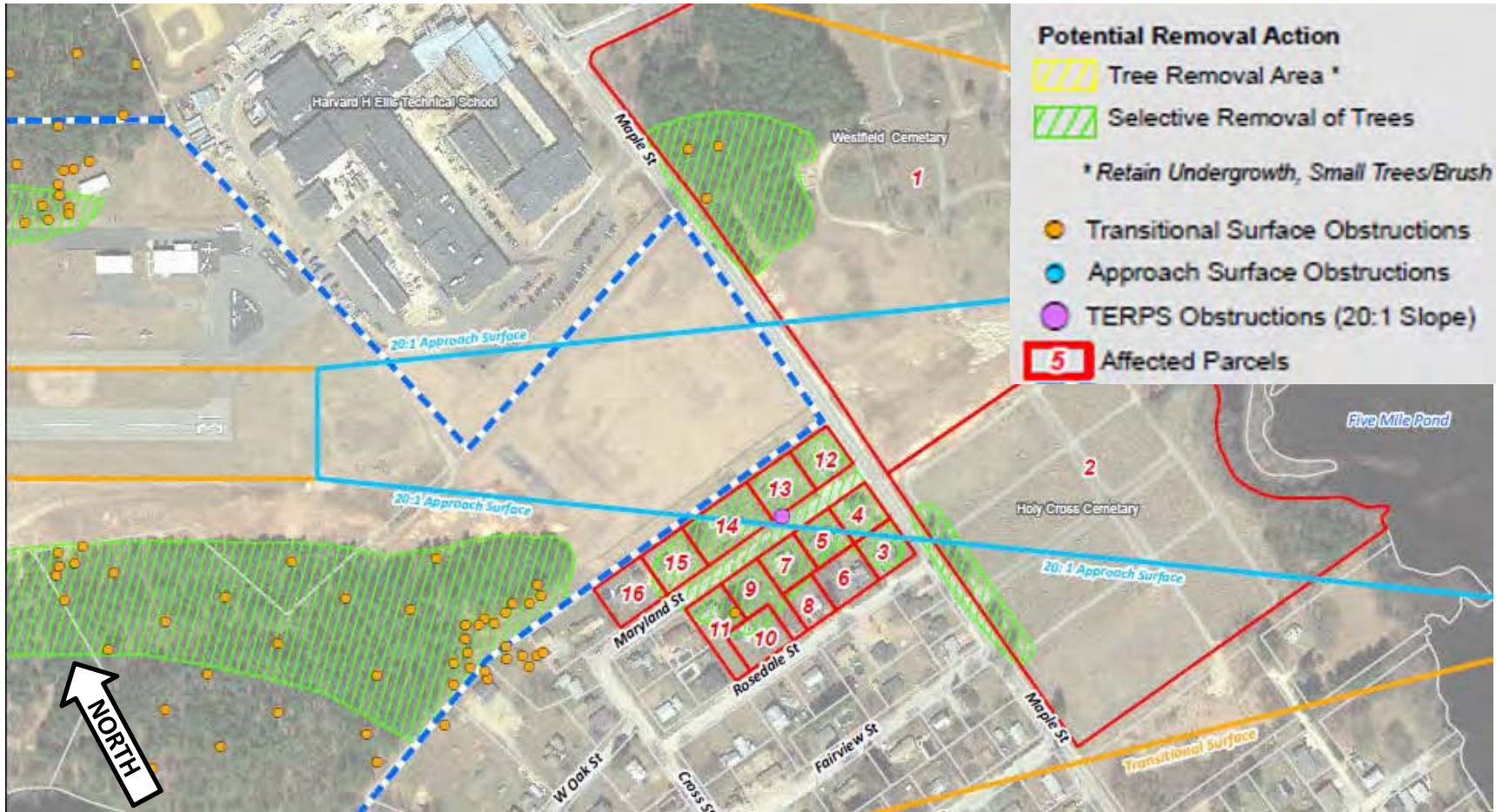
## Advantages

- Clears the critical obstructions
- Satisfies federal design standards and assurances
- Improves safety for people and property on the ground surrounding the airport
- Reduces impacts to environmental resources
- Reduces the number of affected property owners
- Streamlines the project schedule and reduces costs

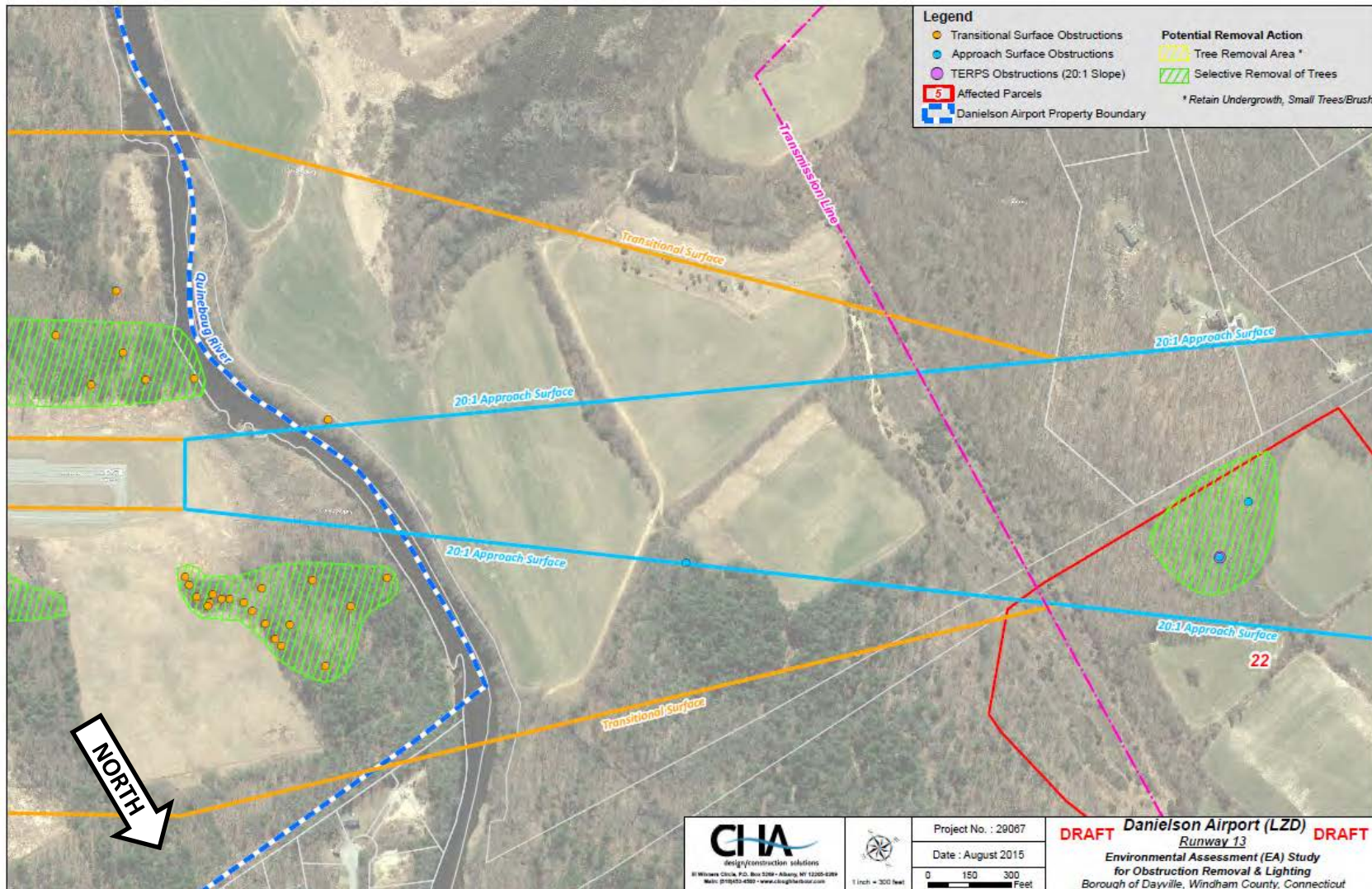
## Disadvantages

- Potential impacts to wetland, biological, habitat, or species of concern remain present
- Easement are required with property owners
- Less critical obstructions will remain
- Outer Part 77 surface are not protected with obstruction lighting

# Runway 31



# Runway 13



# Recommended Alternative

## Modified Obstruction Removal Alternative

- The CAA and FAA have identified this alternative as the most practical solution.
- Balances airport safety with environmental considerations, minimizing cost, and park and private property disturbance.
- Technique of tree removal is described as ‘selective removal or thinning’

# Selective Thinning

- Selective Thinning includes removal of tall trees, with retention of small trees & brush
- Stumps and roots are retained
- Cut logs & branches can be removed or left in place

✘ = Removal of Tall Trees (Obstructions)



# Selective Thinning Example



# Affected Environment & Environmental Consequences

Consistent with the FAA guidelines, the following impact categories addressed:

- Air Quality
- Compatible Land Use
- Construction Impacts
- Parks and Recreational Facilities (Section 4(f))
- Farmland
- Fish, Wildlife, and Plants
- Floodplains
- Hazardous Materials and Solid Waste
- Historical, Archeological and Cultural Resources
- Light Emissions and Visual
- Natural Resources and Energy Supply
- Noise
- Socioeconomic Impacts
- Water Quality
- Wetlands





# Affected Environment & Environmental Consequences

- Key Issues:
  - Land Use/Social
    - Private Property
  - Threatened & Endangered Species
  - Visual
  - Wetlands



# Private Property



# Private Property

- Tree Clearing on Private Property Requires:
  - Negotiations with property owners
  - Purchase of Easement based on Fair Market Value
  - Voluntary Sale of Easement to CAA
- Thereafter CAA is responsible for:
  - All permits / approvals
  - Tree removal activity
  - Repairs to lawns and clean up



# Threatened and Endangered Species

- Threatened Species
  - Northern Long-eared Bat
  - Broad-winged Hawk
  - Wood Thrush and Worm-eating Warbler

- Biological Survey may be required
- Seasonal Restrictions on Cutting



*Northern Long-eared Bat*



*Broad-winged Hawk*



*Worm-eating Warbler*

# Visual - Runway 31

- Selective tree removal will change the viewshed.
  - Particularly in summer during ‘full leaf’ conditions.
  - Less natural shade and corresponding additional sunlight.
- Tree removal includes stump removal, top soiling and reseeding.
- Significant visual impacts are not anticipated.



# Visual - Runway 31

Residential Area with Recommended Selective Tree Removal

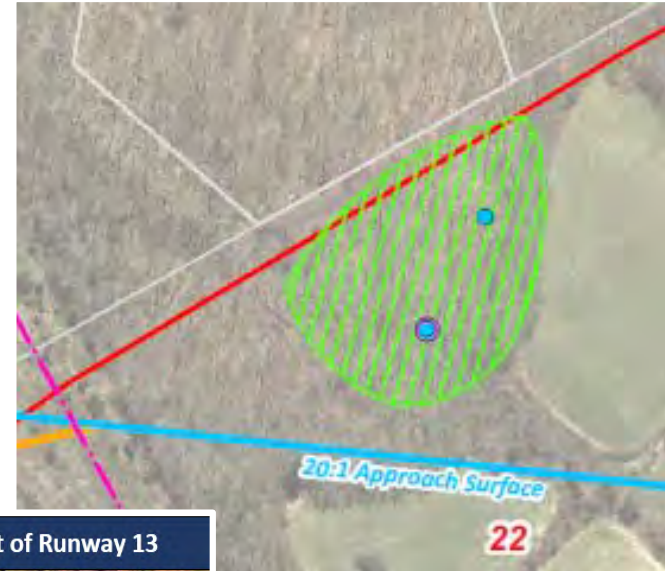


Trees located on Residential Lots (adjacent to Airport)

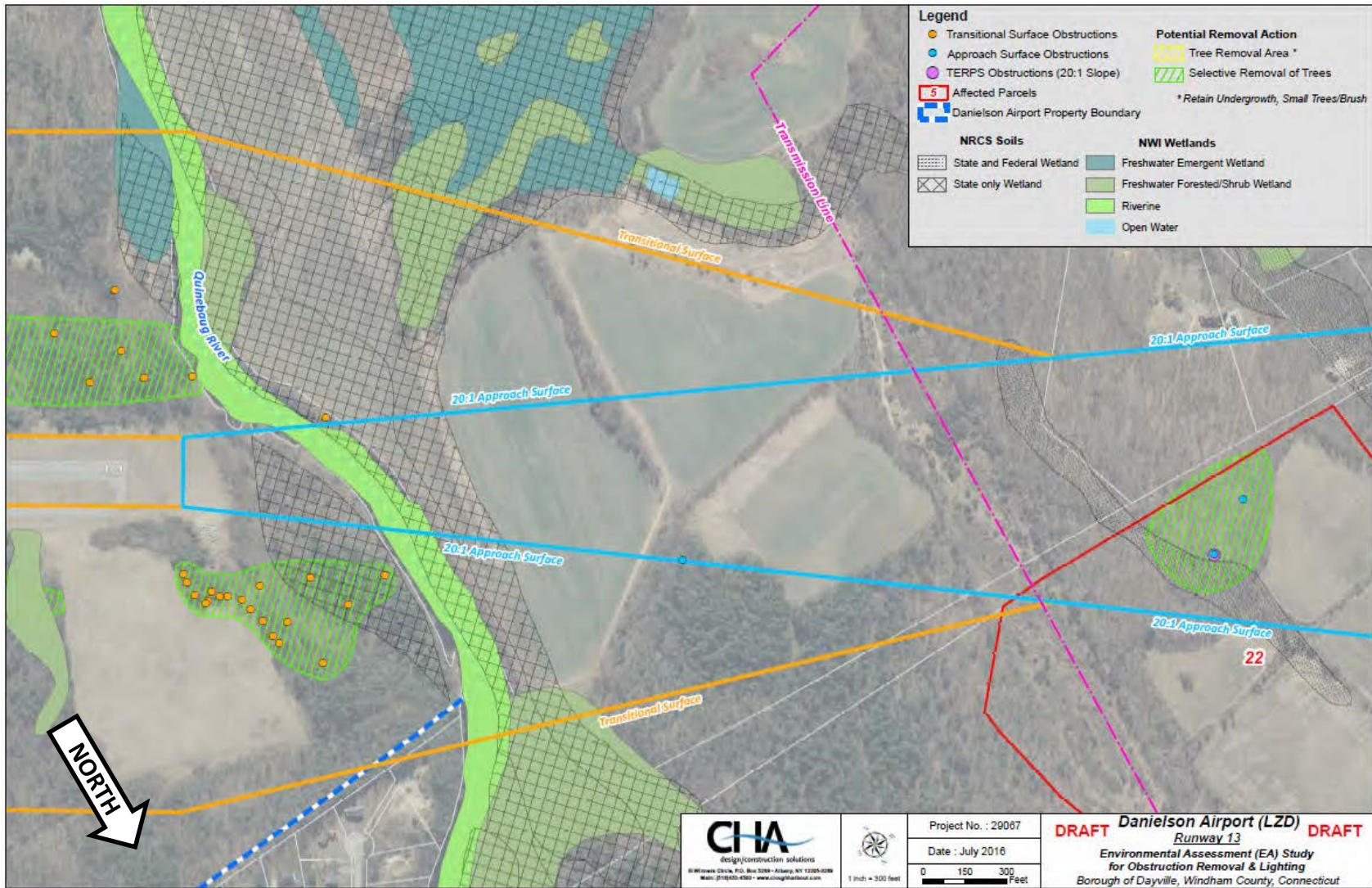


# Visual - Runway 13

- Parcel 22 selected for tree thinning
  - Approximately 500 feet from the nearest residence.
  - Consist of dense woodlands with no nearby development.
  - No visual impacts anticipated.



# Wetlands-Runway 13

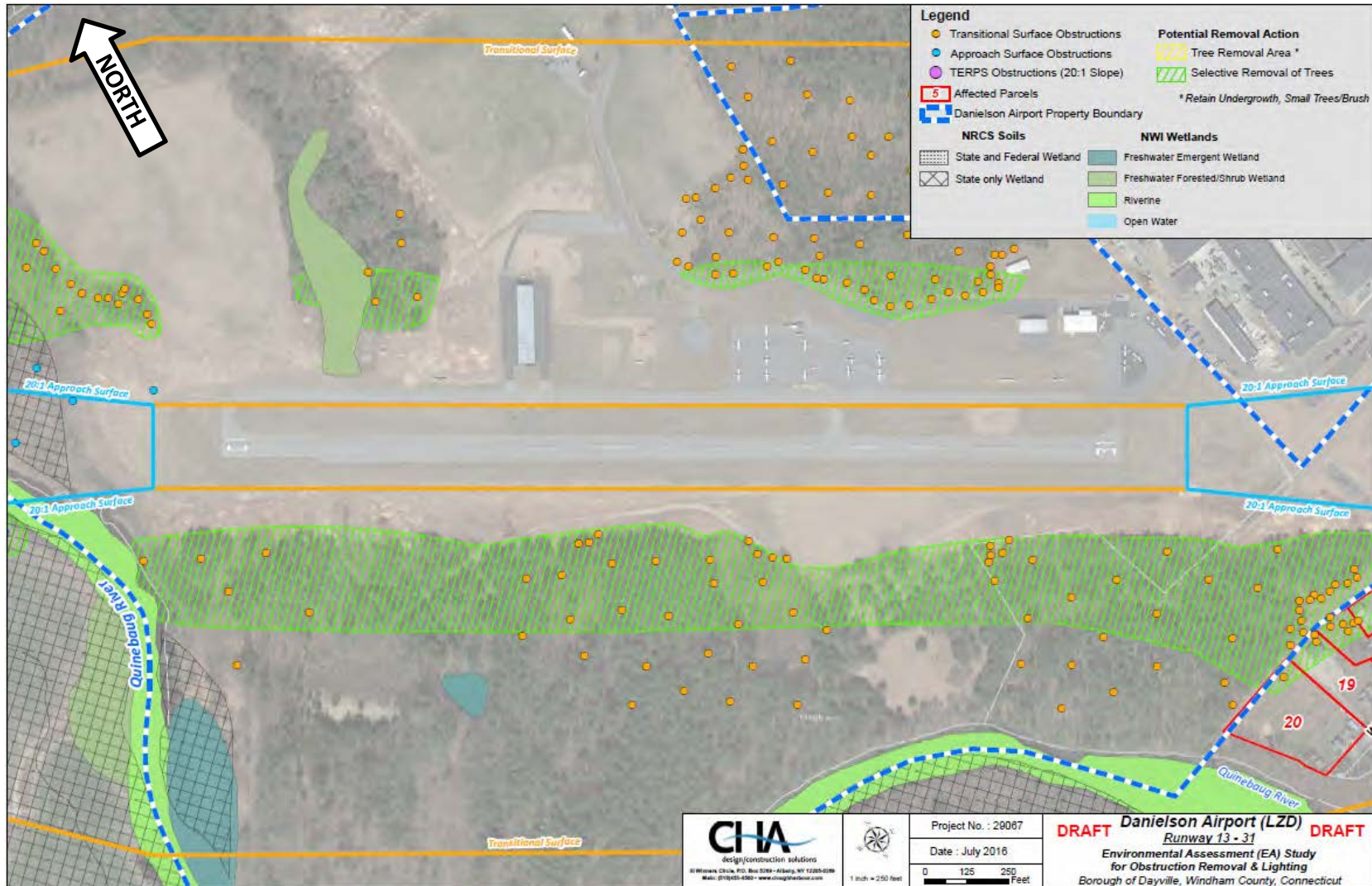




# Quinebaug River



# Wetlands-Runway 13 and 31



# Project Outcome & Next Steps

- Collect & Review Comments
- Prepare Final EA/EIE
  - Action: Publish a Finding of No Significant Impact (FONSI)
  - Action: Publish a Record of Decision (ROD)
- Future Steps:
  - Acquisition of easements from affected property owners
  - Plans & permits of tree removals
  - Tree removals

# Study Information

*Please visit the project website at:*

Danielson Airport (LZD)  
Environmental Assessment (EA) for Obstruction Removal and Lighting



- Home
- Project Meetings
- Project Documents
- Links
- Contact
- FAQ



## Project Information

The Connecticut Airport Authority (CAA) has conducted a detailed study to evaluate existing obstructions that penetrate the federally protected airspace. These obstructions are primarily trees located near runway ends or located on small hills surrounding the Airport. As a follow-up study, the CAA is reviewing the potential impacts of tree removal, and selective clearing and/or thinning in areas the area that contain airspace obstructions. Objects that penetrate these surfaces are classified as airspace obstructions, and should be removed to safely accommodate approaching and departing aircraft.

To accomplish this, the CAA is conducting an Environmental Assessment (EA) under federal and state procedures to identify affected properties and any potential environmental issues of removing trees and/or installing a pole-mounted red obstruction lights. No actual tree removal or construction activities are pending at this time; just the required evaluation.



This study is being performed by Clough Harbor Associates LLP (a subsidiary of CHA Consulting, Inc.). The study is being conducted for the Connecticut Airport Authority (CAA), referred to by the FAA as the "Sponsor." The lead agency for the EAs will be the Federal Aviation Administration (FAA).

<http://danielsonairport.caa-analysis.com/>



# Study Information

***Project EIE Notice posted on CEQ  
Environmental Monitor Online  
Portal – January 13, 2017***

***Please provide comments by  
March 3<sup>rd</sup>, 2017***

<http://www.ct.gov/ceq/site/default.asp>



## ENVIRONMENTAL MONITOR

The official site for project information under  
the Connecticut Environmental Policy Act

January 13, 2017

### EIE Notices

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

#### **1. Notice of EIE for the Connecticut Airport Authority (CAA) – Off-Airport Tree Obstruction Removal at the Danielson Airport**

**Municipality where project is proposed:** The Airport is located in Town of Killingly approximately 25 miles west of Providence, RI and 41 miles east of Hartford.

**Address of Possible Project Location:** The airport office is located at 288 Christian Street, just east of the Quinebaug River.

**Project Description:** Preparation of National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) environmental document as required to evaluate the potential impacts associated with tree obstruction removal in areas on, and surrounding the Danielson Airport. The evaluation addresses obstruction removals associated with Federally-defined airspace surfaces surrounding the airport needed for the continued safe operation of aircraft. Objects that penetrate these surfaces are

# Questions and Comments?

Please provide comments by **March 3<sup>rd</sup>** to:

Colin Goegel

Connecticut Airport Authority

334 Ella Grasso Turnpike, Suite 160

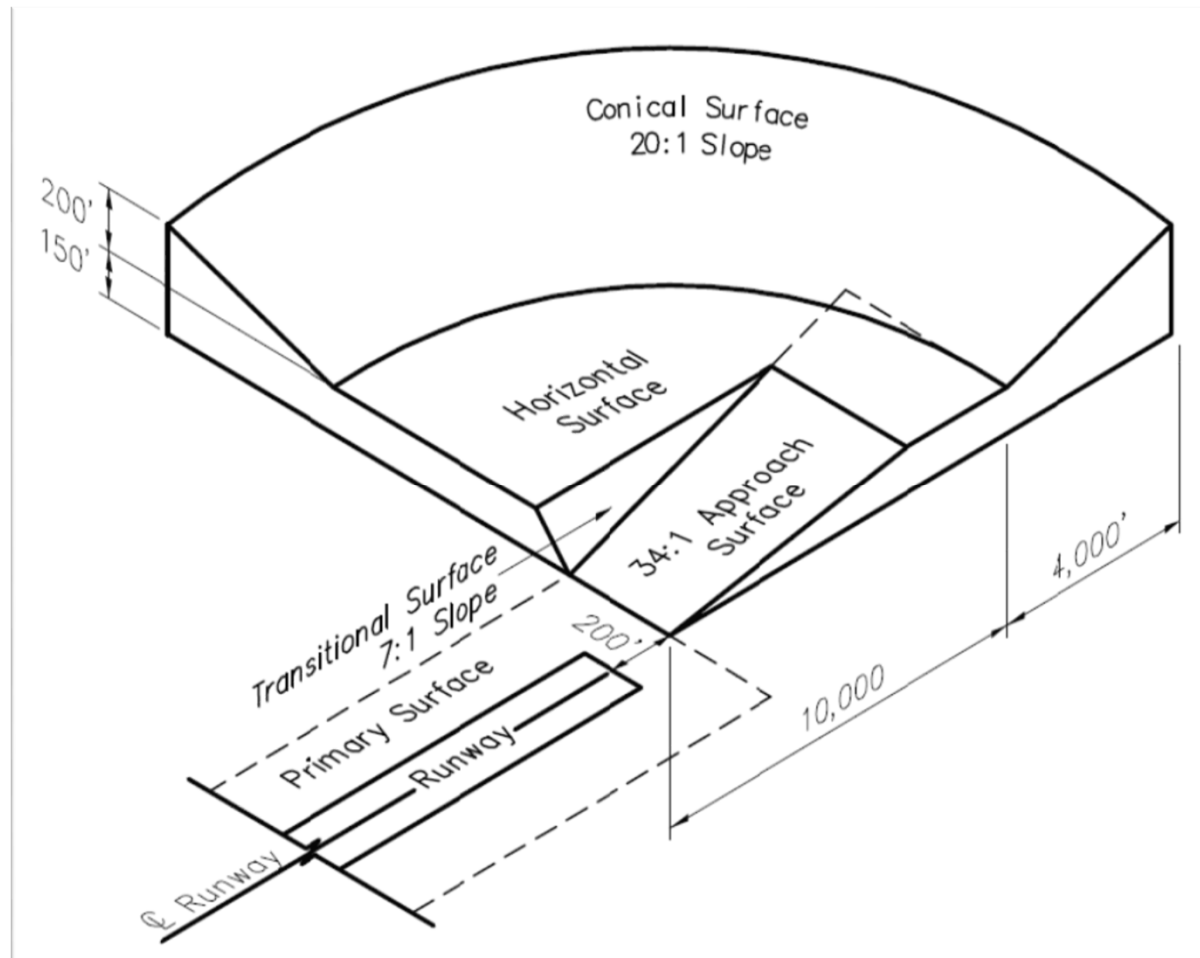
Windsor Locks, CT 06096

[CGoegel@ctairports.org](mailto:CGoegel@ctairports.org)

<http://danielsonairport.caa-analysis.com/>

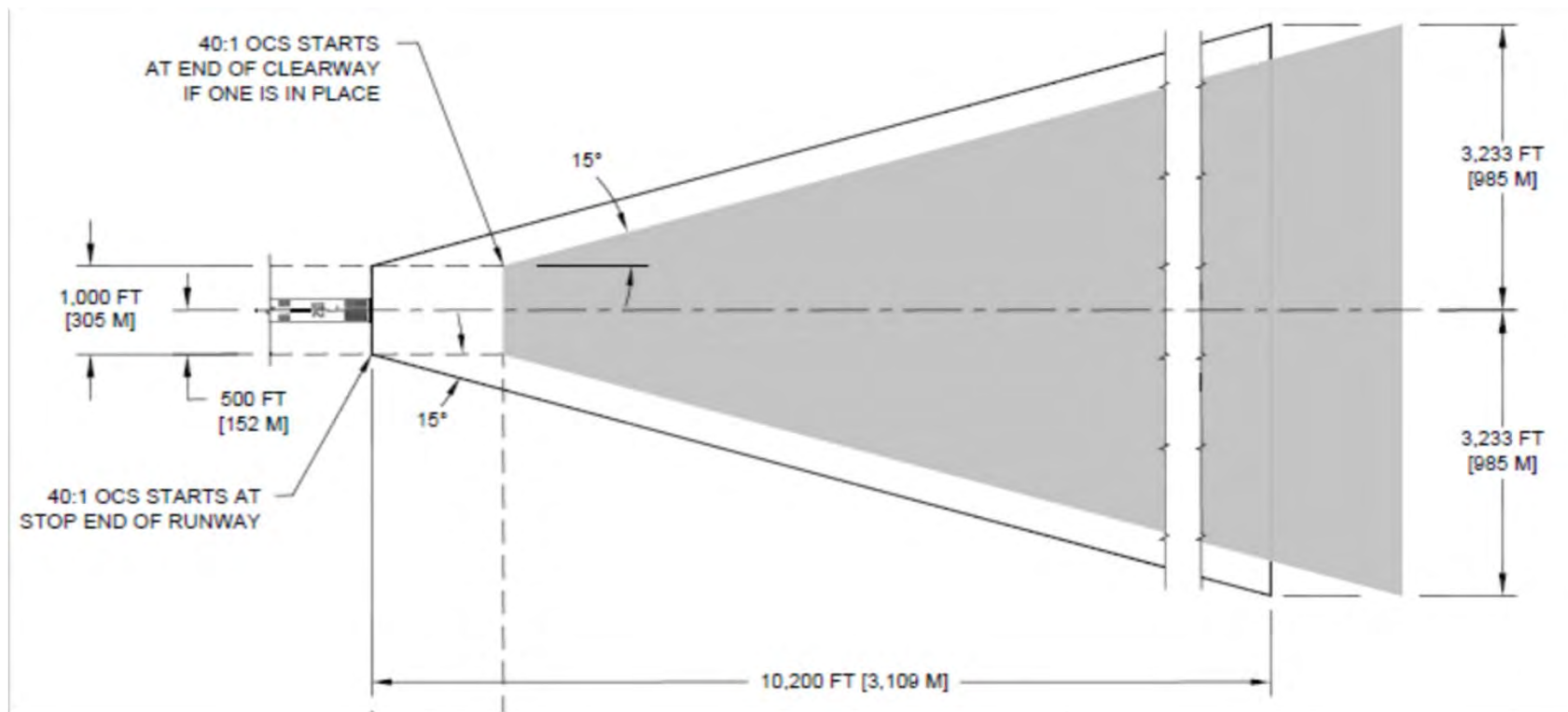
# Federal (FAR Part 77) Navigable Airspace

- Imaginary Surfaces surrounding the Airport, for Obstruction Identification



# FAA Airport Design Standards

- Threshold (Approach) Surface, per Advisory Circular 150/5300-13A







## APPENDIX E COMMENTS/RESPONSES



CT DEEP provided comments on the Draft EA/EIS for the above referenced project on March 3, 2017. The majority of DEEP comments are directed towards minimizing potential impacts to the Quinebaug River. Many of the responses are tied to activities that will occur in the future, during the design and permitting process.

For the convenience of the reader, both the comment and response are provided below.

**Comment** (3<sup>rd</sup> paragraph): Page 3-5 notes that FAA recognizes that off-airport clearing “is often impractical due to environmental impacts” and has defined a different approach surface, the Threshold Surface, to be utilized in such circumstances. The steeper slope of the Threshold Surface results in fewer penetrations, which should lead to reduced clearing.

The modified obstruction removal alternative, using this threshold surface criteria, has been chosen as the proposed action. However, tree removal on the banks of the Quinebaug River, which are the areas of concern to the Department, are within the transitional surface, laterally beyond the approach surface. They are also on airport property. The document does not identify if any lesser safety criteria apply to transitional surfaces or whether they would apply to on-airport property.

**Response:** *Transitional Surface penetrations are not required to be removed by FAA Design Standards, but efforts to eliminate these obstructions, where practical, remain a required objective for all public airports. In practice, the FAA does consider Transitional Surface penetrations to be lesser safety criteria; however, that is not specifically stated in the federal regulations. Per the concerns of DEEP for protection of the banks of the Quinebaug River, CAA can avoid transitional surface tree removal in those locations of the airport property.*

**Comment** (5<sup>th</sup> paragraph):

Page 3-5 also notes that “transitional surface obstruction clearance should be considered after approach surface obstructions are addressed,” implying a lesser urgency for such obstructions. With regard to the Quinebaug River, section 4.2 discusses its inclusion in the Quinebaug & Shetucket Rivers Valley National Heritage Corridor and section 5.17 describes the value of riverbank vegetation, in general. Page 5-17 does state that “a concerted effort will be made to retain trees along the banks of this resource helping to maintain the stability of the riverine shoreline, and shade the banks and water column to the extent practicable.” The Department agrees and would like to emphasize the importance of such efforts.

Preserving vegetation along the banks of the Quinebaug River should be a primary factor in developing a tree removal plan. In accordance with the Inland Fisheries Division Riparian Corridor policy, the Department recommends that every effort be made to maintain a 100-foot wide natural undisturbed riparian buffer adjacent to these waterbodies. See link for a copy of the policy: [Riparian Corridor Policy](#). A significant riparian buffer adjacent to the river regulates water temperatures and minimizes sedimentation into the river.

**Response:** *As stated above the EA does recognize the importance of maintaining vegetation along the Quinebaug River. Based on a review of existing objections and FAA requirements, every effort will be made to meet the guidelines of the [Riparian Corridor Policy](#) and avoid tree removals within a 100-foot wide undisturbed vegetated buffer adjacent to the Quinebaug River. As the project advances into the permitting phase, more detail regarding which specific trees are to be removed and the methodology used for their removal will be thoroughly coordinated with the CT DEEP and other regulatory agencies.*

**Comment** (7<sup>th</sup> paragraph): In discussing potential impacts to wetlands, the document describes a number of tree removal methods. The Land & Water Resources Division recommends that, after NEPA review better defines the areal and quantitative extent of proposed tree removal, the CAA arrange a pre-application meeting to discuss which techniques would best be employed at specific locations to minimize potential wetland impacts.

**Response:** *Agreed. These activities will take place during the initial stages of the design and permitting effort.*

**Comment** (8<sup>th</sup> paragraph): With regard to bats and breeding birds, page 5-9 states: “Based on other airport obstruction removal projects, direct impacts to these species may be avoided via use of seasonal restrictions (e.g., no tree cutting from May through August when these species are known to breed in New England, or other period as determined by regulatory agencies).” In order to assure protection of these species, the Department recommends that this restriction be extended: from April 1 through September 30.

**Response:** *Agreed. Cutting restrictions will be extended to include April 1 through September 30.*

**Comment** (10<sup>th</sup> paragraph): Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects, such as those undertaken by CAA, disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. The SWPCP must include measures such as erosion and sediment controls and post construction stormwater management. The construction stormwater general permit registrations can now be filed electronically through DEEP's e-Filing system known as ezFile. Additional information can be found on-line at: Construction Stormwater GP.

**Response:** *Agreed, all required permits will be obtained for this project prior to removals.*

The Connecticut Fund for the Environment provided comments on Draft EA/EIS for the above referenced project on March 7, 2017. Many of the concerns overlap with the concerns of the CT DEEP outlined in the above correspondence.

**I. The Draft EA/EIE Does Not Adequately Address the Full Extent of Potential Impacts to Wetlands and the Quinebaug River Watershed or Potential Impacts to Threatened and/or Endangered Species**

A. Due the close proximity of the Quinebaug River to the Danielson Airport, various types of wetland are endemic throughout the proposed project area. Although the Draft EA/EIE indicates that tree removal will occur in some wetland areas as part of the preferred alternative, it is difficult to discern the exact extent of wetlands that will be impacted if the preferred alternative is carried out as currently envisioned. Indeed, as the Draft EA/EIE notes, CAA has not taken any steps to formally delineate the extent of wetlands within the project area, instead relying on ground observations made in the course of site visits.<sup>1</sup> Relying only on personal observations rather than precise mapping of wetlands is insufficient to ensure that affected wetlands are both properly identified and ultimately protected during project implementation. In particular, the wetlands in the northern expanse of the project area flank the Quinebaug River and are thereby ecologically linked to that waterbody.<sup>2</sup> The Quinebaug River is currently listed as an impaired waterbody under section 303(d) of the Clean Water Act and has been recommended for delisting. As the river's water quality is on the rebound, no action should be taken that risks the river relapsing into impairment. Wetlands provide a critical ecosystem service by filtering out and trapping otherwise harmful pollutants and sediments.<sup>4</sup> Accordingly, harmful impacts on wetlands in the project area will in turn lead to further degradation of water quality in the Quinebaug River. Precise delineation of affected wetlands is therefore of paramount importance in preventing adverse impacts resulting from the preferred alternative.

*Response: As stated on page 5-17 of the EA/EIE- During the permitting phase of the project, coordination with the United States Army Corps of Engineers (ACOE) and the CT DEEP will be conducted, to provide the plan details and process to avoid wetland impacts. It is anticipated that a Section 401 Water Quality Certification and Section 404 Permit will not be required, based on planned means and methods including winter tree removal.*

*In addition as also stated on page 5-17, Coordination with the CT DEEP Inland Water Resources Division (IWRD) will be completed to determine any requirements to satisfy the Connecticut Inland Wetland Protection Act.*

B. The Draft EA/EIE also notes that implementation of the preferred alternative will likely require CAA to obtain wetland permits and approval from the Connecticut Department of Energy and Environmental Protection ("DEEP"). Although obtaining such permits is further along in the regulatory process, CFE urges CAA to begin coordinating with appropriate DEEP staff as soon as practicable, assuming CAA has not already begun to do so. Effective communication and coordination with DEEP at the current early stage of the project will prevent any unexpected circumstances from arising further on down the line, at which point CAA will have already irretrievably committed resources. Likewise, CAA should solidify and make firm decisions on some of the other contingencies present in the Draft EA/EIE. For example, the document notes that in regard to those trees that are removed in wetland areas, CAA "may" leave the felled trees in place.<sup>5</sup> CAA should provide a firm answer and explanation as to why or why not such trees will ultimately be left where they fall. As fallen trees provide critical habitat for numerous species, such information would obviously be important to members of the public

to consider when evaluating the preferred alternative's ultimate impacts on wetlands.

*Response: Coordination with DEEP was initiated in 2015 when the Notice of Scoping for the project was published in the Environmental Monitor. The CT. DEEP provided scoping comments in July 2015. In addition, DEEP has reviewed and commented on the Draft EA/EIE in particular as it relates to wetlands and the Quinebaug River. All means and methods of removal will be approved by the DEEP and any required permits obtained prior to any tree removal activities. Based on discussions with DEEP, CAA will schedule a pre-permitting meeting at DEEP offices following completion of the EA, but before initiating any formal permitting activities.*

C. The final EA/EIE must also commit to deeper, site specific analysis of potential impacts to threatened and endangered species. The current draft analyzes these impacts primarily in terms of generalities about overall habitat types and species that have the potential to be present based on historical range. Although the Draft EA/EIE indicates that site visits to identify potentially affected species occurred during August, the document further explains that the proposed tree removal would preferably occur during the winter months. As such, an August site visit is of little utility in identifying those species that may be presented when tree removal would actually occur. CAA should undertake a site visit to identify affected species during the time period at which the actual project is proposed to occur.

*Response: Information from DEEP and the USFWS is typically used to identify important species and/or habitats that may be present in the vicinity of a project. The information supplied by these agencies is not precise (usually a one mile radius). A biologist uses a combination of desktop data, aerial mapping and field visits to determine if the specific site conditions on the project site match the needs of the identified species (cover type, food, breeding requirements). This process was employed during the completion of this EA/EIE.*

*As stated on page 5-9 of the Draft EA/EIE, direct impacts to forest/woodland dependent species of conservation concern identified by state and federal agencies can likely be avoided through restriction of tree removal activities to seasonal periods when these species are not present. The document proposed no tree cutting from May to August to avoid the breeding season. The DEEP requested that this restriction be extended from April 1 to September 30; which will be reflected in the final EA/EIE. As a result, cutting restrictions will limit direct impacts to any migratory or breeding species that could frequent the area. As part of the pre-permitting meeting with DEEP, the need for additional site reviews, or formal biological surveys will be discussed.*

## **II. The Draft EA/EIE is Imprecise as to the Exact Extent of Tree Removal and Contains No Information on CAA's Plans to Coordinate and Educate Property Owners About Tree Removal on Private Property.**

A. The Draft EA/EIE provides conflicting estimates of the exact acreage of land that will be affected by tree removal conducted pursuant to the preferred alternative. At various points throughout the document, the affected acreage provided varies between several figures including six acres, 46 acres, and 95 acres. This lack of specificity makes it difficult to determine the full extent of planned tree removal and greater clarity in this regard would allow the public and affected landowners to draw more informed and helpful conclusions from CAA's proposal.

*Response: The calculations for selective removal were presented in two formats which created confusion and resulted in some overlap (on and off-airport and approach and transitional surface). A review of these calculations has resulted in the following: off-airport tree removal= 12 acres; on-airport removal = 32 acres, for a total 44 acres of selective removal. Of this area, approximately 15% are within the approach surface, with the remainder in the transitional surface.*

*Notification letters were sent to all property affected owners (one in 2015 and one in 2017 immediately prior to the Public Informational Meeting). Several owners attended the public meeting where the general process was discussed. Note that as a state/federally funded project, all requirements of the Uniform Act are applicable, which protect the rights of affected owners. The EA has been reviewed and adjustments made in the text to provide consistency.*

- B. The Draft EA/EIE contains scant detail about those trees on private, residential property that will be removed under the preferred alternative. Naturally, given that many of these trees will be located in the yards of private residences and property owners will be attached to them, CAA must be as forthright and clear as possible in developing any plans to remove trees on private land. As CAA is likely aware, recent tree removal alongside Connecticut's roadways has proved a flashpoint for controversy that catalyzed citizen action around issues of tree removal on private property. CAA should commence coordination with Killingly municipal officials and the town tree warden as soon as possible in order to fully engage the local community and ensure that any citizens whose properties may be affected have ample notice of proposed removal and an opportunity to contest removal.

*Property owners of affected parcels, property owners adjacent to affected parcels and municipal officials in each town where removals (which included Killingly) could possibly occur were sent written correspondence in June 2015 notifying them of the project. Property owners were again notified by mail on February 1, 2017 of the Public Information Meeting and each Town was contacted by telephone and email regarding the public meeting. The meeting was also advertised in the local paper and in the environmental monitor.*

*As discussed on page 3-3 of the EA/EIE any tree removals on residential and other private parcels, would require that CAA acquire a permanent 'avigation' easements prior to any tree removal activities. Avigation easements refer to a permanent conveyance of airspace, from a property owner to the airport, granting the airport the right to overfly the property and remove obstructions within a defined airspace surface. This process involves licensed appraisals to determine fair market value, negotiation with property owners, and acquisition of the perpetual rights to remove existing tree obstructions and prevent future obstructions. This process was discussed at the public meeting, and included in the meeting minutes.*

### **III. The Draft EA/EIE Contains No Information Regarding Climate Change or the Climatological Impacts of Widespread Tree Removal**

- A. CFE is also concerned that the current Draft EA/EIE contains no analysis or evaluation regarding climate change and the importance of trees in reducing atmospheric carbon dioxide levels. Anthropogenic climate change is doubtless the greatest environmental challenge of the present time and every EA, EIE, and EIS should evaluate how any proposed project or action has the potential to contribute to—or diminish—the effects of the climate change. Furthermore, the current proposal for the Danielson Airport is but one of several tree removal projects that CAA



has proposed at various airports through Connecticut. The Draft EA/EIEs issued for these other projects also contained no analysis of climate change in relation to the proposed tree removals.

*Response: FAA and DEEP do not have specific policies or guidelines to evaluate the impacts of tree removal as it relates to climate change. FAA desktop reference 1050.1F addresses climate change as it relates to creation of CO2 emissions. At the federal and state level, climate change impacts are now being reviewed with respect to projects with developments and facilities that result in additional CO2 emissions. This project will remove tall trees, but will not produce CO2 emissions.*

*At the conclusion of this project, the remaining vegetation will continue to grow including both trees and understory. As such, area areas will remain vegetated and wooded, with substantial less environmental effect than if the project was to include pavement and development of the area. Federal standards to not address tree removal itself as a potential significant impact on climate change.*

