



Stantec Consulting Services, Inc.  
136 West Street, Northampton, MA 01060-3711

December 29, 2022  
File: 179450287

**Attention: Ms. Bianca Beland**  
CT Dept. of Energy and Environmental Protection  
Regulatory – East Region  
Land and Water Resources Division  
Bureau of Water Protection and Land Reuse  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127

Dear Ms. Beland,

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project  
CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

This document contains our Response to Comments (RTC) pertaining to a permit application filed by the Connecticut Airport Authority (CAA). The CAA has requested a permit pursuant to the Inland Wetlands and Watercourses Act (IWWA; Connecticut General Statutes (CGS) Sections 22a-36 through 22a-45) and associated regulations (Regulations of Connecticut State Agencies Sections 22a-39-1 through 22a-39-15) for proposed work within jurisdictional wetlands resulting from the removal of obstructions to navigable airspace at the Hartford-Brainard Airport (HFD) and associated easement properties.

The IWWA permit application was submitted to the CT Department of Energy and Environmental Protection – Land and Water Resources Division (CT DEEP) on April 13, 2022 per the IWWA filing requirements pertaining to quasi-public agencies of the State of Connecticut (see Section 22a-39-4.4 of the IWWA Regulations). “Section 15-120bb(a) of the Connecticut General Statutes names CAA a public instrumentality and political subdivision of the state created for the performance of an essential public and governmental function. Pursuant to Chapter 12, Section 1-120, CAA is classified as a quasi-public agency subject to the requirements found in Chapter 12”. Thus, the CAA has been working directly with the CT DEEP on IWWA permit application instead of the local municipal inland wetland commissions.

During the application review process, the CT DEEP issued a public notice to receive public comment on the application. The notice was issued on November 30, 2022 and identified December 27, 2022 (5PM) as the end of the comment period. During this period, the CT DEEP held a public informational hearing on December 15, 2022 that included presentations by the CAA and the CT DEEP staff containing detailed information about the application and the project. As a part of the public hearing, public comment was received and recorded.

The combined written and verbal comment received by the CT DEEP during the specified comment period was evaluated for relevance to the IWWA and associated regulations, with particular focus on Sec. 22a-39-2. “Definitions”, Sec. 22a-39-4.1. “Regulated activities to be licensed”, and Sec. 22a-39-4.2. “Regulated activities”. This process is specific to wetland-related impacts and the ability to permit the project per the

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current IWWA regulations. As the IWWA permit process requires compliance with the CT Endangered Species Act, comments pertaining to the project's impacts on state-listed species were also considered relevant and addressed. Comments received but deemed to be irrelevant to the IWWA permit application were noted accordingly in this RTC document. The document format includes a listing of the comment in chronological order followed immediately by a response from the CAA based on the project design, information from the permit application, and/or information provided during the public hearing. No "new" information is provided in this RTC, simply clarification of information previously provided to and reviewed by the CT DEEP as part of the permit process. Note that several comments suggest that the proposed airspace obstruction removal project represents an "expansion" of the airport with a purpose of "increasing flights" at the facility. We continue to emphasize that the proposed action is an airspace maintenance effort to retain existing flight patterns and runway minimums currently established for the airport. The actions do not provide for a change in the runway classifications at HFD.

We hope these materials are suitable for the CT DEEP to finalize their evaluation of the wetland-related issues of the proposed vegetation management at HFD. Thank you for your assistance with this important public safety project. Please contact us with any questions.

Sincerely,

**Stantec Consulting Services, Inc.**



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**Randall P. Christensen** M.S.  
Senior Environmental Scientist  
Phone: 413387 4508  
randy.christensen@stantec.com

Attachment: CT DEEP Public Notice

c.  
CT DEEP – Janice Deshais (via email)  
CT DEEP – Jeff Caiola (via email)  
CAA – Robert Bruno (via email)  
CAA – Colin Goegel (via email)  
CAA – Molly Guyer (via email)  
Stantec file

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
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## **Comments and Responses**

1. Email Comment Thu 12/1/2022 2:55 PM

Title: 12/15/22 Hearing - Application #202204934-IW

From: Bryan Wolf [bwkw1998@gmail.com](mailto:bwkw1998@gmail.com) (and Kim Wolf)

*I would like to submit my personal public comment regarding application #202204934 – IW. My name is Kim Wolf, my husband Bryan and I live in Old Wethersfield. I also work for the Town of Wethersfield. I am the Town's Historic District Coordinator; I have been in this position for about five years. During this time, I have seen first-hand the great care and concern that our historic district commissioners have given to our Town. They are charged with maintaining the visible appropriateness for Old Wethersfield structures, the aesthetics, as directed by state statutes. Our commissioners are experienced volunteers that make sure Old Wethersfield remains a beautiful, visually-appropriate historic district. Hours of their time each week are donated to assure that the district is beautifully maintained, not only for the homeowners and business owners in the district, but also for tourists and visitors to see architecture and historical details that are not available to see in other areas nearby. The Old Wethersfield historic district is the largest and the oldest in this part of the country. Our homeowners and business owners take great care and concern to maintain properties that are historically accurate and/or updated in a manner that is respectful to the time period of the home or business and also to the neighborhood.*

*In regard to this application, it only seems appropriate that we follow the same care and concern for our surrounding land areas as well. Removing and cutting the trees and nature that add to the beauty and uniqueness of Old Wethersfield would be inappropriate and irresponsible, not to mention it would lower our property values and destroy the living spaces for our wildlife that rely on the protection and stability of the trees and plantings. Removal and alteration of the landscape would cause disruption to the ecosystem's balance. Thriving trees keep the soil stable, absorb flood waters, and provide habitats. We have seen bald eagles, hawks, fox, coyotes, deer, woodchucks, beaver, birds, squirrels, and probably many more. My husband's late grandmother, Eleanor Buck Wolf worked her whole life to protect the Cove area and the creatures at her doorstep. She wrote books about Old Wethersfield and the Cove; her home was located at 400 Hartford Avenue overlooking the water. Preservation of the Cove area mattered to her.*

*Following in Eleanor's footsteps, as we are lifelong Old Wethersfield residents as well, we are against allowing low-flying planes to continue to fly over Old Wethersfield because it is obnoxious, unhealthy, and it's unnecessary. It's time for it to stop. Planes from the Hartford airport fly too low, they are disruptive, and many do not follow over the River as required. We don't need to change the landscape of our Town to accommodate more flight traffic.*

*This area is an important part of our history and our future. Please leave our beautiful ecosystem alone. Don't cut the trees. Don't expand the airport.*

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

### CAA Response to Comment 1

The commenter mentions the project aesthetics relative to the “Old Wethersfield” section of one of the involved municipalities of the project. The CAA presented in the public hearing that the forested areas involved with this project were previously cut in the 1980s and have since regrown to their present condition thus forest management has been a characteristic of the airport environment since its development in the 1930s. The CAA has carefully planned the current project to ensure minimization of the number of tree targets to be addressed, and the extent to which each will be reduced in height. A review of the project plans clearly demonstrates this commitment to minimization of tree removal and height reduction. There is a clear attempt by the applicant to balance the Federal Aviation Administration regulatory requirements of airspace maintenance with the sensitive ecological conditions of the work area. The proposed work ranges from the ground-level removal of trees in-close to the runway ends (where the protected airspace surface elevation is lowest) to the hand pruning of the upper branches of trees further out in the landscape where the airspace elevation is higher. A project alternative was the ground-level removal of all target trees to maximize the longevity of the project, which was dismissed due to the sensitive ecological conditions of the work areas. This effort by the CAA to work within the environmental regulations by identifying and minimizing potential wetland impacts will result in the need for more frequent maintenance of the work areas since live, growing trees will remain within the runway approach surfaces after the project. Note that significant impact minimization was achieved in the project planning phase by requiring only the most critical airspace surfaces to be cleared for existing conditions at HFD. Obstructions to the transitional surfaces of the runways will remain at the Airport due, in part, to the ecological sensitivity of the area.

Additionally, the proposed vegetation management will not result in the eradication of the tree targets. The floodplain tree species that dominate the work areas are known for their aggressive regrowth from cutting; even those targets that are cut to ground level. Evidence of this regrowth capability is present within the project limits in the form of multiple-trunked trees. In fact, the vast majority of trees within the mechanical management zone of the project consist of previously cut floodplain tree species (primarily silver maple) with multiple trunks emanating from the previous trunk cut line. It is anticipated that this will again be the result of the proposed cutting of trees with this project. This aggressive regrowth, combined with the protection and preservation of the non-target vegetation (smaller trees, shrubs and groundcover) will allow the work areas to remain in a densely vegetated state. Some plantings are also included in the project.

With regard to the commenter’s reference to wildlife habitat concerns we offer the following. The subject work within the floodplain forest was presented to the CT DEEP (Natural Diversity Database) staff responsible for the protection of state-listed rare species for assessment of the habitat modifications relative to the critical habitat characteristics of the various life stages of the subject species. Issues were identified by the CT DEEP staff that required project modifications to avoid impacts to these species, including bald eagle protection. These modifications, including strict project timing requirements, limits of mechanical removal near waterways, the control of invasive plant species and the need for revegetation of the riverbank, were addressed to the satisfaction of the CT DEEP staff. Furthermore, the limiting of “flush cut” tree removals in favor of “snag” cut removals in the mechanical cutting zone further reduces the changes to wildlife habitat on the site. The CAA specified a significant part of the 33.8-acre work area to include hand cutting only, which will have virtually no impacts on wildlife habitat. These measures have been included in the project to minimize impacts to wetland functions and values, including wetland-related wildlife habitat. The CAA has proposed these measures in the IWWA permit application and the CT DEEP will evaluate these measures for their adequacy relative to the IWWA regulations.

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2. Email Comment Fri 12/9/2022 3:53 PM

Title: DEEP permit to allow for the removal, topping, and pruning of trees which pose immediate obstruction hazards to Hartford-Brainard Airport....

From: Dr. Arnold L. Goldman drrne@comcast.net

*To Whom It May Concern,*

*With respect to the proposed DEEP permit to allow for the removal, topping, and pruning of trees which pose immediate obstruction hazards to Hartford-Brainard Airport, I urge approval of the permit.*

*The trees have grown up into the flight path and create a danger as well as require an alteration of flight path which can be unsafe*

*Regardless of any future changes in the use of the land that the airport occupies, the danger is real and is present now, and the tree trimming should go forward in the interest of safety to those engaged in flight as well as those on the ground. This is a normal maintenance task at every airport in the country and it should not be regarded as something unique to Brainard nor as any sort of political tactic.*

*Please approve this necessary tree work.*

CAA Response to Comment 2

The CAA has developed a project “purpose and need” statement for the IWWA permit application currently pending with the CT DEEP; this information was a significant part of the presentation made by the CAA at the CT DEEP public hearing on December 15, 2022. The Federal Aviation Administration (FAA) has established a regulatory framework for public use airports requiring airspace maintenance. The CAA has reviewed the condition of the airspace using the assessment methods prescribed by the FAA. The results of the assessment agree with the commenter that the approach surfaces are obstructed and require immediate attention. The CAA also agrees with this commenter that this is an airport maintenance task, and not an action promoting a change or expansion of runway use. Airspace maintenance is a primary task of airport management throughout the country and will continue to be an important component of airport planning at every public use airport.

The results of the airspace obstruction analysis were made a part of the IWWA permit application and were also a part of the public hearing presentation. The CAA believes that the project “purpose and need” has been well established and documented in the IWWA permit application package.

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

3. Email Comment Sun 12/11/2022 3:25 PM

Title: CAA tree cutting

From: Mary & Frank Sena

*As residents of Wethersfield, we are strongly opposed to the cutting by the CAA of the 33 plus acres of designated conservation land-Folly Brook Nature Reserve and Wethersfield Cove south of Folly Brook. Besides the environmental damage and loss of wildlife habitat, this cutting will allow for the possibility of airport runway expansion which will lead to larger planes and more noise disturbance for the residents of Old Wethersfield. The 1.5million dollar feasibility study by the CRDA will not be finished until late 2023.This study is backed by officials of both Hartford and Wethersfield. Absolutely no cutting should be allowed until the results of the study are known.*

CAA Response to Comment 3

The ecological sensitivity of the Folly Brook Natural Area (FBNA) and the IWWA regulatory requirement of addressing the FBNA conservation easement are acknowledged by the CAA. As a part of the project planning process, the CAA coordinated with The Nature Conservancy (TNC) in the review of the project relative to the special conditions of the 1990 conservation easement placed on a portion of the property requiring airspace obstruction removals. These 1990 easement conditions are contained in the property deed including the designation of TNC as the steward of the property. The CAA conducted meetings and a site visit with TNC representatives in evaluating the project relative to the “tree cutting plan” of the 1990 easement. The project was modified as a part of the coordination with TNC and concluded in July 2022. The project was found to be in conformance with the conservation easement and associated “tree cutting plan” by the responsible TNC representatives. Compliance with conservation easements and restrictions within the project limits is a condition of the IWWA regulations. Suitable documentation of compliance with the FBNA easement, including a record of coordination with TNC, was provided to the CT DEEP as a part of the pending permit application. These materials can be found in Attachment 8 of the IWWA permit application.

The commenter suggests that the project “purpose and need” includes a runway expansion leading to a modification of the runway usage and associated noise contours. Note that the purpose and need has been clearly stated in the IWWA permit application and in the public hearing materials. The project will maintain the airspace as it currently exists and will not alter the runway classification or allow for future expansion. The work will support the current runway usage but will improve the safety of air operations by removing airspace obstructions.

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4. Letter Comment 15 December 2022 (TRANSMITTED BY ELECTRONIC SUBMISSION)

Title: Re: Connecticut Airport Authority Application No.: 20220493-IW

From: Sean M. Collins, AOPA - Eastern Regional Manager

*The Aircraft Owners & Pilots Association (AOPA) is the world's largest aviation membership organization representing the general aviation interests of 3,122 in the state of Connecticut. On behalf of these members, AOPA supports approval of the Connecticut Airport Authority (CAA) application [No.: 20220493-IW] to remove hazardous tree obstructions threatening the Hartford-Brainard Airport.*

*The Hartford Brainard Airport (HFD) is listed in the National Plan of Integrated Airport Systems (NPIAS) and has accepted federal airport improvement program (AIP) funding as recently as 2015. As a condition of accepting these grants, the state is bound by Title 49 U.S.C. §47107, which outlines a set of obligations known as grant assurances. An airport sponsor under such obligations is required to operate the property in accordance with strict safety guidelines intended to protect the flying public and those on the ground. Maintaining obstruction-free approaches to runways is a critical component of ensuring safe operations.*

*General aviation airports like HFD are an incredible resource for business growth and economic development. Business leaders from every industry rely on airports to increase efficiency, productivity, and accessibility for their business. Airspace and approach zone obstructions, including unmitigated vegetation (tree) growth, can jeopardize the safety of operations at these airports. Regrettably, officials from Hartford have stood in the way of prudent safety measures that serve to support this important business activity, forcing the CAA to reduce usable runway lengths by displacing the thresholds for Runways 02 – 20 by more than 900 feet in total. While the operation of light aircraft is tentatively safely retained through this action, business-oriented aircraft operations can be restricted. Each day these threats are not resolved, the vegetation and the risk to safe aircraft operations continue to grow.*

*While some community members have raised concerns regarding the anticipated loss of vegetation leading to increased erosion along the Connecticut River, the FAA issued a finding of no significant impact in the 2017 Environmental Assessment (EA). The analysis found that any potential impacts can be reasonably mitigated to avoid significant socioeconomic and environmental impacts. Therefore, in keeping with our mission of promoting safety, AOPA supports the DEEP permit approval to commence with the required obstruction clearing.*

CAA Response to Comment 4

The CAA is in general agreement with this commenter. The CAA has developed a project “purpose and need” statement for the IWWA permit application currently pending with the CT DEEP; this information was a significant part of the presentation made by the CAA at the CT DEEP public hearing on December 15, 2022. The Federal Aviation Administration (FAA) has established a regulatory framework for public use airports requiring airspace maintenance. The CAA has reviewed the condition of their airspace using the



**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

assessment methods prescribed by the FAA. The results of the assessment agree with the commenter that the approach surfaces are obstructed and require immediate attention. The CAA also agrees with this commenter that this is an airport maintenance task, and not an action promoting a change or expansion of runway use. Airspace maintenance is a primary task of airport management throughout the country and will continue to be an important component of airport planning at every public use airport.

The results of the airspace obstruction analysis were made a part of the IWWA permit application and were also a part of the public hearing presentation. The CAA believes that the project "purpose and need" has been well established and documented in the IWWA permit application package.

The CAA acknowledges the commenter reference to the outcome of the National Environmental Policy Act – Environmental Assessment process completed by the Federal Aviation Administration (FAA). The FAA did issue a Finding of No Significant Impact (FONSI) upon review of a planning-level review of the environmental impacts related to obstruction removal at the Airport. The FONSI contained conditions which the CAA was required to address during the design phase of the project. The CAA has addressed most of those conditions and continues to pursue the final required environmental permit for the project (the IWWA).

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5. Email Comment 12/15/2022

Title: (none)

From: Elizabeth Pirro

*Thank you for hosting tonight's hearing. As a Wethersfield resident who values our town, wooded areas, cove, and beautiful historic Old Wethersfield, I join all who spoke against the current plan. I am very much in favor of waiting for the results of the airport study.*

CAA Response to Comment 5

HFD has been constructed and maintained as a public use airport and has been substantially funded by the Federal Aviation Administration (FAA). Grants issued by the FAA for airport improvement projects contain grant assurances requiring airport operators/management to comply with FAA regulations and design criteria. Such compliance ensures continuity in operation and design at airports across the country, with public safety as the ultimate objective. The CAA, as the designated authority for the Airport is subject to these grant assurances and will continue to diligently pursue compliance through proper channels. Such diligence includes the pursuit of necessary permits and approvals for maintenance and improvement projects. The CAA will continue to perform their duties as established by the Connecticut General Statutes as long as HFD remains a public use airport. Any studies by others of the future use of the Airport is irrelevant to the everyday operation and safety compliance duties mandated by statute to the CAA.



Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

6. Email Comment Fri 12/16/2022 4:01 PM

Title: Public Comments: Application No.: 202204934-IW Applicant: Connecticut Airport Authority

From: Cindy Jacobs <cindy.jacobs724@gmail.com>

*Thank you for the opportunity to comment on the CAA proposed removal/topping/pruning of 33.8 acres of trees located near Brainard Airport.*

*As a resident of Wethersfield CT, I oppose the CAA proposal as excessive and unnecessary for the operation of Brainard Airport.*

*First, as a state environmental agency, your primary responsibility is the stewardship of our state natural resources and protection of our wildlife. There is no compelling reason to justify the excessive removal, topping or pruning of these trees. Brainard Airport has operated successfully for many years with this wooded area intact. The CAA proposed tree removal/topping/pruning creates excessive disturbance of the acreage and increases the risk of inviting invasive species into a fragile wildlife area.*

*Second, maintaining these 34 acres of trees makes an important contribution to the quality of life and commercial interests in Wethersfield. This acreage provides an important noise buffer from airplanes for the citizens, visitors and businesses in our town, especially in the historic district of Old Wethersfield. Alteration of this wilderness by removal, topping or pruning these trees would benefit a few persons associated with Brainard Airport but would be detrimental to many citizens who live and work in our town and the economic lifeblood of Old Wethersfield.*

*Third, any alteration of this wilderness is premature. Currently, a regional study is underway, which will consider alternative uses to Brainard Airport. Keeping the 34 acres of trees intact makes sense while alternative land uses are still under study.*

*Fourth, I am concerned that the CAA proposed excessive alteration of 34 acres of wooded land provides an open door for the expansion of Brainard Airport, which would result in greater detriment to citizens and businesses in Wethersfield.*

*Please take the sensible action by ruling against the CAA proposed removal, topping and pruning the 33.8 acres of wooded land located near Brainard Airport.*

CAA Response to Comment 6

The commenter expresses concern regarding the potential for the project to introduce invasive plant species. The CT DEEP (Natural Diversity Database staff) had a similar concern when reviewing the project relative to state-listed rare species. Their concerns resulted in the development of an invasive species management plan for the project limits. This includes post-management inspection of the site for invasive plants and the control of those plants while enhancing the growth of native species. The invasive species management plan is contained in Attachment 17 of the IWWA permit application.

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The commenter suggests that the subject trees provide a noise buffer between the Airport and Old Wethersfield. While there is indeed a perception that vegetation can reduce decibel levels between a noise source and a reception, actual analysis suggests that only dense, continuous and wide vegetative barriers are capable of any noticeable reduction in receptor noise levels. In general, the ability to view the noise source (aircraft) adds to this perceived "increase" in decibel levels. The master plan analysis for HFD of noise levels using the most up-to-date analysis procedures prescribed by the Federal Aviation Administration suggests no change in decibel levels in the Old Wethersfield vicinity in the near term. Loss of the screening vegetation, though unfortunate, is a necessary maintenance process for the CAA to address FAA-mandated safety concerns regarding airspace penetrations.

Studies pertaining to vegetation and transportation noise levels are few, but one by the Federal Highway Administration (from their FHA Noise Barrier Design Handbook) explores the potential for vegetative barriers. In their conclusion, the FHA suggests

"Shielding by trees and other such vegetation typically only have an "out of sight, out of mind" effect. That is, the perception of highway traffic noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents (i.e., "out of sight, out of mind"). However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 5 m (15 ft) in height, 30 m (100 ft) wide and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation area may provide up to 5 dB(A) of noise reduction."

For air traffic noise, the vegetative barrier problem is even more complex since the angle between the source and receptor has a vertical component that is typically lacking in the cited FHA text. While loss of the trees is an unfortunate result of the project, the CAA has designed the project to retain vegetation that does not threaten the airspace. Only the most critical airspace has been subjected to the proposed obstruction removal project. Significant tree stands will remain between Old Wethersfield and the Airport.

The comment includes a reference to delaying airspace maintenance due to on-going land use studies. HFD has been constructed and maintained as a public use airport and has been substantially funded by the Federal Aviation Administration (FAA). Grants issued by the FAA for airport improvement projects contain grant assurances requiring airport operators/management to comply with FAA regulations and design criteria. Such compliance ensures continuity in operation and design at airports across the country, with public safety as the ultimate objective. The CAA, as the designated authority for HFD is subject to these grant assurances and will continue to diligently pursue compliance through proper channels. Such diligence includes the pursuit or necessary permits and approvals for maintenance and improvement projects. The CAA will continue to perform their duties as established by the Connecticut General Statutes as long as HFD remains a public use airport. Any studies by others of the future use of the Airport is irrelevant to the everyday operation and safety compliance duties mandated by statute to the CAA.

The commenter suggests that the project will result in an expansion of the airport. Note that the purpose and need has been clearly stated in the IWWA permit application and in the public hearing materials. The project will maintain the airspace as it currently exists and will not alter the runway classification or allow for future expansion. The work will support the current runway usage but will improve the safety of air operations by removing airspace obstructions.

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## 7. Letter Comment

Title: (none)

From: Amy Morrin Bello, State Representative - 28th District

*I am writing today to express my strong opposition to the proposed tree cutting at Brainard Airport. This proposal would remove, top, and prune over 33.8 acres of trees in state inland wetlands which pose immediate or future obstruction hazards, including approximately 16 trees south of Folly Brook despite assurances that it would only be a few. It appears only one of these trees is actually an obstruction.*

*From an environmental standpoint, the removal, topping and pruning of trees poses a loss of habitat for wildlife, erosion of the riverbank, and tree cutting debris which will enter the CT River and pose concerns for the water flow in and out of the Wethersfield Cove. The Cove has been the site of years of remediation for water safety and this would potentially be a step in the wrong direction for the maintenance of the water quality.*

*I'm also very concerned with the lack of public input as well as the lack of input from relevant state agencies that could provide valuable insight in how this plan may create significant environmental issues.*

*If the airport wishes to remove trees in order to improve safety and visibility, then I encourage them to hear public and expert input in order to reach the most sustainable solution to the problem they are addressing.*

### CAA Response to Comment 7

The commenter refers to the pruning of trees on the Wethersfield-owned property on the south side of Folly Brook. These particular trees were identified as being within 5-10' of the airspace surface based on the 2019 leaf-on aerial photogrammetry collected for the project; this condition was presented on Slide 24 at the public hearing. Since the collection of the tree-top data, three full growing seasons have passed with an associated height increase of the vegetation within the study area. It is common practice to implement a minimum safety factor in the tree height data based on a host of variables including age of the data, vegetation type and relative age of the vegetation. In the case of deciduous floodplain trees within a relatively crowded condition, the top branch leaders would be expected to continue to maximize sunlight capture through vertical growth (similar trees in an open environment would tend more towards a horizontal growth and a more rounded form). Given the observed conditions of the subject trees, the use of a 5-10' safety factor to determine pruning needs was deemed warranted. This also provides for some level of project longevity avoiding the need for frequent airspace removal projects in sensitive areas. By managing target vegetation to below the airspace surface, some years of growth of the managed vegetation can occur without a re-obstruction of the airspace. Thus, the maintenance funds are being expended to generate some years of unobstructed airspace to promote safe flight operations. Conversely, a project that manages vegetation to the exact airspace elevation may be obstructed during the following growing season, achieving no project longevity and little airspace improvement.

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The Wethersfield-owned property has been identified for pruning only. The subject trees will be climbed, and the top leaders of the tallest trees will be cut using property pruning techniques that promote survivability of the tree. Branches dropped to ground level are specified to be hand-cut to sub-3' lengths and scattered in the vicinity of each tree. Scattering the limited debris prevents a mulching effect on the lower vegetative layers thus minimizing the ancillary impacts of the pruning action.

With regard to the commenter's reference to wildlife habitat concerns we offer the following. The subject work within the floodplain forest was presented to the CT DEEP (Natural Diversity Database) staff responsible for the protection of state-listed rare species for assessment of the habitat modifications relative to the critical habitat characteristics of the various life stages of the subject species. Issues were identified by the CT DEEP staff that required project modifications to avoid impacts to these species, including bald eagle protection. These modifications, including strict project timing requirements, limits of mechanical removal near waterways, the control of invasive plant species and the need for revegetation of the riverbank, were addressed to the satisfaction of the CT DEEP staff. Furthermore, the limiting of "flush cut" tree removals in favor of "snag" cut removals in the mechanical cutting zone further reduces the changes to wildlife habitat on the site. The CAA specified a significant part of the 33.8-acre work area to include hand cutting only, which will have virtually no impacts on wildlife habitat. These measures have been included in the project to minimize impacts to wetland functions and values, including wetland-related wildlife habitat. The CAA has proposed these measures to the CT DEEP as a part of the IWWA permit application and the CT DEEP will evaluate these measures relative to the IWWA regulations and determine their adequacy relative to those regulations.

Management of wood debris generated by the project has been the subject of significant study during the project planning process. The CAA has been limited in site access due to the presence of the flood protection levee system that separates the airport from most of the obstructing trees. The access over the levee by machinery has been constrained to a once-in, once-out condition by the City of Hartford. Mechanical tree removal (the "flush-cut" and "snag-cut" zones) includes the removal of downed timber using a crane to lift the debris over the levee. The snag cuts leave significant trunk sections of the target trees standing as either habitat and/or for regrowth. The topping and pruning areas are off-limits to mechanical access and thus on-site management of debris is proposed. The debris is limited in scope and is to be reduced in such a way that pieces will be sub-3' and widely scattered. Such debris can be floated by floodwaters but is of a size to be of reduced concern relative to the larger diameter trunk sections and/or entire trees. Small diameter, short sectioned upper branching is not known for causing debris jams of the type mentioned by the commenter. The CAA will have full-time inspection of the contractor to ensure compliance with the debris reduction specification.

Regarding the opportunity for public input into the planning process for this project we offer the following. The CT DEEP has commented on this issue in a previous reply to a project comment (email of 11/15/22 from Janice Deshais to Cynthia Greenblat). In their reply, the CT DEEP expressed the following:

- *The individuals affected by this proposal have had numerous opportunities to receive public information or to interact with the CAA about its proposed work, including opportunities since 2017. The CAA has conducted significant public outreach concerning this project, which has included public hearings and meetings in Hartford, Wethersfield and Glastonbury. This outreach includes recent efforts. Hearings and meetings*

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

- *have been publicly-noticed, have been open to the public, and have included the opportunity for public comment.*
- *The Notice of Tentative Determination posted on the DEEP website on October 12, 2022, specifically advised that “[b]efore making a final decision on this application, the Commissioner shall consider written comments on the application from interested persons. Written comments on the application should be directed to Bianca Beland via electronic mail to [bianca.beland@ct.gov](mailto:bianca.beland@ct.gov) no later than thirty (30) days from the publication date of this notice.” This announcement did not prohibit anyone interested in the application from making comments, nor did it imply that members of the public could not comment.*
- *If an interested member of the public has not seen this specific plan, it has been available on the CAA website since November 9, <https://ctairports.org/airports/hartford-brainard/planning-engineering/>. The plan will be also presented and explained at the December 15 public hearing. That is the purpose of the hearing.*
- *If any vegetation management plan is part of this application, information on that plan will be part of the CAA presentation on December 15. The Comment Response Document will also respond to any relevant comments on such a plan.*

*Interested members of the public have had the chance to learn about and comment on this project for a significant amount of time. The specifics of this project are set out in the application which has been posted on the CAA website since November 9. The public may make comments on the 15<sup>th</sup> and may submit written comments until the 22<sup>nd</sup>. This period for written comments is typical for most hearings, which are part of a process that must balance the need to inform the public with the right of applicants to apply for a permit to conduct regulated work.*

Additional coordination with State and Federal agencies has also been conducted by the CAA, resulting in modifications to the project plans and specifications to address each agency’s needs. Coordination with the U.S. Army Corps of Engineers, CT Office of Dam Safety, the Greater Hartford Flood Control District, the Metropolitan District Commission, and The Nature Conservancy has been completed during the project design process which was initiated with multi-agency site visits on November 23, 2020 and April 6, 2021. More than 2 years of design planning has been expended on this one project, which was preceded by two years of planning level interaction through the National Environmental Policy Act process. Four years of agency review process to address known, existing public safety issues is a definite concern to the CAA, who is charged with the safety of the flying public at this facility.

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

## 8. Letter Comment

Title: (none)

From: Rhea Drozdenko River Steward, Connecticut River Conservancy

*I am writing on behalf of the Connecticut River Conservancy (CRC) to submit comment regarding the Connecticut Airport Authority's (CAA) application 202204934-IW for permit to conduct certain activities regulated by CGS §§ 22a-36 to 22a-45, inclusive (the "Inland wetlands and Watercourses Act"), pursuant to CGS § 22a-39. CRC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River and its watershed. Protecting and restoring riverbanks is a main goal of our organization – and we have restored over 130 acres of floodplain along over 75,000 feet of river shoreline since 2011. At CRC, we believe that the CAA's proposed activity of removal, topping, and pruning of trees over 33.8 acres of inland wetlands is a step in the wrong direction; but, if it is required for safety – we want to ensure that it is done in the most environmentally friendly way possible.*

*First, I want to acknowledge the CAA for hearing and listening to the concerns of citizens and environmental groups back in 2017. In particular, I am grateful to see that they have reduced the number of acres affected by these activities from over 40 to just over 30. That will make a big difference, and I appreciate the efforts to prevent unnecessary removal. I understand the need for airport safety, but the safety of our inland wetlands is also important to our ecosystems – so thank you for considering both.*

*Riverbank trees and shrubs are vital to improved water cleanliness, more stable riverbanks, and better fish and wildlife habitat for our rivers. Native trees filter polluted runoff and provide a buffer zone between our streams and land use. We are concerned that tree removal may lead to erosion along the Connecticut riverbanks, and that by removing native trees – there is a risk of letting non-native species thrive.*

*After reading through the Permit Application and Environmental Assessment, my team provides the following recommendations:*

- Whenever possible, leave shorter trees where they are. The riverbanks of the Connecticut River are home to Silver Maple, Eastern Cottonwood and Sycamore trees – all of which provide habitats, filter water runoff and stabilize the banks. If they are under 20 feet - we ask the CAA to let them stay.*
- Plant native shrubs and small trees wherever the large trees are cut. Removing large trees will create an open space very susceptible to the spread of non-native species – including multi-flora rose which is already present on the site. Depending on the site conditions – there are native wetland species like Shrub Willow (*Salix* species), Silky Dogwood (*Cornus ammonum*) or upland species such as Viburnum (*Viburnum* species) and Common Elderberry (*Sambucus canadensis*). These species do not grow very tall and would provide important food and shelter for numerous pollinators, birds, and other native wildlife, and would help protect the area from further non-native plant spread.*
- We insist that the CAA not plant any non-native trees or non-native shrubs in the area. In addition, they should only plant species appropriate to the habitats being planted.*



**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

- *We urge the CAA to uphold their agreements with all landowners and to operate in compliance with local and state regulations.*

#### CAA Response to Comment 8

The Connecticut River Conservancy has developed several science-based, wetland-related questions and comments regarding the project in their letter. Each of their bulleted comments is addressed below.

With regard to the protection and preservation of non-target (low) trees within the work areas, the CAA will act to protect the sapling, shrub and groundcover layers within the mechanical removal zones. This “non-target” vegetation will help to revegetate the mechanical work areas following the management effort. In the non-mechanical (hand labor) work areas, non-target vegetation will be completely preserved, including a strict 30’ zone along the bank of the Connecticut River where no equipment is allowed.

The commenter suggested plantings to enhance riverbank protection. The project already contains a planting plan for those work areas within 100’ of the riverbank. Plantings will include live stakes of native floodplain vegetation that is already present on the site including black willow, bank willow and both silky and/or red-twig dogwood. These species are known to readily grow from live stakes. Furthermore, it is anticipated that more than 75% survivability of mechanically-managed trees will result from the project. Silver maple in particular will resprout from cut stumps, particularly in a floodplain environment where moisture conditions are optimal for this species.

Regarding the comment on invasive species; no non-natives are included in the plan. The current planting plan includes site collection of the live stakes so that the same ecotype of the proposed planting species will be retained in the project areas. The planting will be subject to full-time inspection by biologists experienced in the collection and planting of native vegetation through the live stake/sticker method. Furthermore, the project includes an invasive species control plan involving two follow-up control periods of invasive plant species using a variety of target-specific techniques. Post-project reporting to the CT DEEP is a requirement of both the planting plan and the invasive species control plan.

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#### 9. Email Comment 12/16/2022

Title: December 16, 2022 Testimony for December 15 Public Hearing via Zoom

From: Stephen G. Socolosky, Socorv7a@gmail.com

*I am in FULL SUPPORT of the CAA's permit application to conduct tree work in the runway approach areas, specifically the approach areas to Runways 2, 20, 11, and 29, at the Hartford-Brainard airport, in order to comply with the FAA's regulatory safety requirement that no obstructions penetrate the defined navigable airspace. Please see the two illustrations below from CAA's DEC 2017, 575-page Report (see original email for the illustrations).*

*While this process has taken far too long, it is very clear that we now have a VERY reasonable*



**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

*solution and the tree work MUST begin immediately!*

*Chair of the Great Meadows Conservation Trust, Mr. Jim Woodworth, testified and submitted a proposal for planting new trees that are both slow-growing and low-growing, and that are strong enough to maintain the riverbank. The planting of such trees along with removing those trees which penetrate the FAA's defined navigable airspace, will not only create the safe environment that the FAA requires, but will offer a long-term solution before trees become an issue in the future again - perhaps beyond 30 years.*

*As President of the Experimental Aircraft Association (approx. 200,00 Members worldwide) local Hartford Chapter 166, BASED AT BRAINARD AIRPORT, we have a vital role in educating the future of aviation through our Young Eagles Program where we offer young people a free flight in a small aircraft and follow up with many other incentives such as a free online Private Pilot course, tree Membership into our Chapter to help build a real airplane (in Hangar 2, Home of the RV-12), along with Mentorship to navigate any area of aviation!*

*I am also a high school Technology Education teacher for the past 23 years and am a Member of CT Aerotech's (Aviation Maintenance Technician School at Brainard) advisory committee, which promotes their valuable program!*

*Since 1998, I have been a Member of the Aircraft Owners and Pilots Association (AOPA) and for the past seven years, I've been the Airport Support Network (ASN) volunteer for Brainard Airport. As the ASN volunteer, I support and promote Brainard Airport in a variety of ways, such as this testimony.*

*I have been flying out of Brainard Airport since 1992, as a Private Pilot, and have experienced the threats to close Brainard Airport by the SAME FEW PEOPLE, who hide in the shadows. However, those who explore beyond the unsubstantiated public rhetoric, will easily find the SAME FEW PEOPLE, who are simply motivated by their own greed.*

*Finally, I would like to express my FULL SUPPORT for this permit application to proceed with the tree work and urge all involved to MOVE QUICKLY to get the work done in the next few months!  
Thank you!*

#### CAA Response to Comment 9

The CAA is in general agreement with this commenter. The CAA has developed a project "purpose and need" statement for the IWWA permit application currently pending with the CT DEEP; this information was a significant part of the presentation made by the CAA at the CT DEEP public hearing on December 15, 2022. The Federal Aviation Administration (FAA) has established a regulatory framework for public use airports requiring airspace maintenance. The CAA has reviewed the condition of their airspace using the assessment methods prescribed by the FAA. The results of the assessment agree with the commenter that the approach surfaces are obstructed and require immediate attention.

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

The commenter references a vegetation management plan that was presented during the National Environmental Policy Act process by staff of the Great Meadows Land Trust. This plan was reviewed and was found to be consistent with the typical approach to airport vegetation management at many airports throughout the country. Note that typical vegetation management projects at airports are based on a Vegetation Management Plan (VMP) which seeks to promote low-growing vegetative communities of native plants which respect environmental considerations while avoiding growth into the protected airspace. A VMP analyzes the protected airspace elevations throughout the airport while concurrently assessing the present plant communities (dominant species, mature heights, soil conditions, etc...). The document then prescribes the target plant community and a long-range plan (typically 5-7 years) to achieve the desired result through a combination of mechanical and chemical vegetation control methods. A VMP typically requires extensive mechanical removals of undesirable species in the first year, followed by various maintenance efforts to protect and enhance the target low-growing native plants while eliminating regrowth of the taller natives and the invasive plants. In the case of HFD, development and implementation of a VMP of this scale was not feasible given that the work is to occur primarily on easement parcels where the easement language differs between easement parcels and provides strict limitations on the vegetative targets that can be removed, and the means/methods of removal. Additionally, the rare species issues along with the extreme limitations placed on the CAA regarding equipment access and wood removal has further complicated the VMP approach to the project design. To rapidly achieve the necessary permits to complete this work, a more subdued removal project has been designed which addresses immediate airspace needs. A negative aspect of this approach is that the project longevity will not be that of a true VMP approach to the airspace obstruction issue. Stantec staff have developed VMPs for more than 20 airports over the past 25 years and believe strongly in this approach to managing airspace obstruction issues. However, given the number of barriers to a true VMP approach faced by the CAA at HFD, along with the extent of airspace penetrations already present in the runway approaches, the present design is a reasonable design compromise at this time.

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#### 10. Public Hearing Testimony Thursday 12/15/2022

From: Cindy Greenblatt

Editor's Note: Given the length of this particular testimony and the number of questions/comments posed, the responses are provided following each pertinent comment/question. This format differs from that of the previous responses. For clarity, the testimony is provided in italics while the response is provided in normal font.

*I have been a member of the Hartford Brainard Noise Advisory Commission since 2016 and attended the public hearings in Wethersfield on this plan in 2017. I begin tonight by saying that safety is a priority for me. At the last quarterly meeting of the Advisory Commission in October, the airport admins shared data on monthly flights. We were assured that Brainard airport is safe to use, and the number of operations verified that. However, my safety concerns are not just limited to airport operations. I am also concerned about the loss of habitat for birds, animals and plants, the health of the community and the long-term implications of this deforestation for the region. So, how can we look at this application and license and address ALL the safety concerns? There are several interrelated aspects of this permit that could be modified to achieve that.*

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

1. *The 20-year project lifespan presented in this permit application has resulted in a massive capture of trees that are not even obstructions. Trees are being identified to be cut at 15' below the obstruction plane. Perhaps this might be justified in different circumstances, but these lands are floodplains, conservation lands, and lands managed by the Nature Conservancy easement. There are 35 trees in Wethersfield that are not obstructions, do not need to be cut and shouldn't be.*

CAA Response: The airspace analysis was provided in slides 10-18 of the public hearing presentation and in Attachment 14 of the IWWA permit application. The airspace analysis used a target of 15' below the protected airspace surface to map potential obstructions; these are shown as white tags in the analysis. In designing the vegetation management project, the engineer then included all blue tags (5-10' below the airspace elevation) and the green tags (0-5' below the airspace elevation) to determine the limits of each management area. White tags (10-15' below the airspace surface) were included for pruning only when they were in closer to the runway end and were a species that were proven to be capable of obstructing the airspace at a particular location. Note that all white tags are not included in the project (see slide 25 of the public hearing presentation). Careful consideration was given to each vegetation management area and the lower trees within those areas. Trees 10-15' below the surface were included only where field analysis revealed probable near-term obstruction. Note that the airspace data is now three years old with significant growth occurring during this time period. It is reasonable to expect tree growth during that period where formerly white tagged trees are now closer to obstructing the airspace.

2. *The consequence of this massive capture of trees has created a very real problem which is not addressed in this permit. Many of these trees are in the Nature Conservancy easement and will be hand pruned and topped. By rough count there will be 102 trees cut. The plan is to cut up the top, limbs and branches into smaller pieces and scatter them on the floodplain floor. This is described as common practice. What is completely ignored is the reality of the area: the common practice of the CT River is to flood north to south every year. This is well known and indisputable. The proximity of Folly Brook and the Wethersfield Cove make it not only hypothetically possible-it makes it plausible-that what will happen is that this debris will be swept into the Cove, the Folly Brook channel, and the CT River. The impact, as you should expect, will be harmful to the environment and to the passage of boats in the channel and to the river. A similar plan in 1990, impacted the CT River as far as Haddam.*

CAA Response: The project specifications require the contractor to dice project limbs generated by topping/pruning into sub-3' sections. Additionally, the wood generated by the topping/pruning portion of the project is of a smaller diameter, consisting of only the upper limbs and not the larger trunk sections. Inspection of the floodplain over the past three years revealed significant natural wood debris from the site and upstream sources each year; a naturally occurring event that will persist with or without the project. Our specifications have included the removal of all mechanically generated debris using a crane to lift the cut trees over the levee. With these measures, the project is not anticipated to exacerbate the Wethersfield Cove problem of annual, river-generated wood debris from the significant upstream wooded floodplain acreage that extends through a 4-state area.

**Reference:** Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)

3. *This permit does not require enough trees to be planted to replace the ones that are being removed. These trees are critical for oxygen, habitat, and temperature control. Recent research has shown that even a one-to-one replacement of trees can no longer be considered adequate as mature trees process far more in the carbon exchange.*  
CAA Response: Trees managed as a part of the mechanized removal portion of this project are anticipated to regenerate from the intact root systems as has occurred with past projects and is clearly evident on the site. Silver maple, the dominant floodplain tree of this project area is capable of sustaining significant damage, typical of the floodplain environment, and to continue growing. The topping/pruning portion of the work is not expected to generate any tree mortality and only minimal impacts to the micro-climate of the site. The mechanical portion of the work has been minimized to the extent practicable while achieving the public safety objective of the project. The replanting included in the project is not to replace trees, but to enhance the riverbank zone with species that are better suited for bank stabilization while remaining below the airspace elevation (black willow); the CT DEEP has approved this plan. The completely vegetated site will remain in that condition in the post-project era, as has occurred with prior airspace management projects at HFD. No long-term loss of vegetative cover of the site will result from the project.
4. *The DEEP permit in an attempt to protect the floodplain requires particular ground conditions and temperatures. The permit is too vague on the implementation of this crucial wetland protection. Should it specify the number and type of environmental monitors or certified forest practitioners required?*  
CAA Response: The project includes a full-time inspection team to ensure compliance with the project specifications and the permit conditions.
5. *How would a member of the public voice their concerns? There is no established protocol for the public to contact DEEP about permit issues and other concerns*  
CAA Response: Contact the CT DEEP Land and Water Resources Division using the permit name and ID number provided in this RTC document for voicing project-related concerns during vegetation management at HFD.

**QUESTIONS:**

1. *Could the number of trees affected be reduced by restricting the trees ID'ed as obstructions to 5' or 10' below obstruction plane instead of the present 15'?*  
CAA Response: The white tags on the airspace analysis plan sheets that represent objects 10-15' below the airspace elevation were used to highlight potential problem areas. These were then further refined based on field inspection to limit the number of these lower trees scheduled for management. A close inspection of the airspace analysis (slide 25 of the public hearing presentation and Attachment 14 of the IWWA permit application) clearly reveals that only a portion of the lower "white" tags are scheduled for management, and only for topping/pruning where full survivability is anticipated. The CAA has exercised great caution in setting the management limits for this project at the cost of project longevity. Further reduction of management effort could lead to the failure to achieve a clear airspace for the existing runway conditions.
2. *Could you increase the number of trees planted to offset the effects of deforestation?*  
CAA Response: Full regrowth of trees from the mechanical "flush cut" and "snag cut" removal area is anticipated, as has occurred with previous vegetation management at HFD. The dominant

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

species in the mechanical management zone is silver maple which has a strong regrowth potential from root systems. No mortality of the topping/pruning trees is anticipated. Given the low mortality of trees in the management area and the competitive advantage of the tree regrowth from the mature root systems will severely limit the survivability and the impact of introduced tree stock. The natural regrowth of the managed area will revegetate the site. Note that the site contains a complete and dense groundcover layer that will be preserved by the winter removal timing of the project.

3. *Will a licensed, independent environmental monitor be in place before any tree cutting?\**

CAA Response: A qualified CAA representative will be present at the site during the entire work period. This representative will be fully versed in the project specifications and the permit conditions.

4. *Will the environmental monitor (certified Forest Practitioner) be empowered to green light or red light the work based on the DEEP temperature/frost requirements?*

CAA Response: The full-time CAA representative has the authority to stop or modify the work based on field conditions relative to the permit requirements. Permit conditions will include minimal frost conditions on the site to protect soils. This representative also has the authority to implement the project's flood contingency plan.

5. *Who is responsible for monitoring the permit requirements for temperature/snow/frost layer?*

CAA Response: The full-time CAA representative has the authority to stop or modify the work based on field conditions relative to the permit requirements, which includes site frost conditions. This representative also has the authority to implement the project's flood contingency plan.

6. *What is the protocol for the public to make contact about permit issues and concerns?*

CAA Response: Contact the CT DEEP Land and Water Resources Division using the permit name and ID number provided in this RTC document for voicing project-related concerns during vegetation management at HFD.

7. *Are there fines for violations of the permit?*

CAA Response: The CT DEEP will determine penalties for violations of the permit.

8. *Who would be legally responsible for the dredging of Folly Brook, property damage, or damage to the Cove as a result of massive woody debris deposited in the floodplain?*

CAA Response: As no project-related blockage of Folly Brook is anticipated from the minimal project input of diced, small diameter wood debris from the hand labor portion of the project, this question is considered irrelevant to the purposes of this RTC document.

9. *Why wasn't Inland Wetlands or the Conservation Commission in Wethersfield notified of the permit application before DEEP?*

CAA Response: The IWWA permit application was submitted to the CT Department of Energy and Environmental Protection – Land and Water Resources Division (CT DEEP) on April 13, 2022 per the IWWA filing requirements pertaining to quasi-public agencies of the State of Connecticut (see Section 22a-39-4.4 of the IWWA Regulations). “Section 15-120bb(a) of the Connecticut General Statutes names CAA a public instrumentality and political subdivision of the state created for the performance of an essential public and governmental function. Pursuant to Chapter 12, Section 1-120, CAA is classified as a quasi-public agency subject to the requirements found in Chapter 12”.

**Reference:** Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)

Thus, the CAA is legally responsible to consult the CT DEEP on IWWA permit application instead of the local municipal inland wetland commissions.

10. *Why wasn't a proper Environmental assessment done on the five acres of Wethersfield land added to the project after the FONSI was granted?*

CAA Response: The CAA did communicate with the FAA regarding the original FONSI issued on August 1, 2017, by the FAA for the HFD Obstruction Removal NEPA Environmental Assessment (Final Version issued December 2017). In our post-EA review with the FAA in March/April 2022 the updated plans and easement needs were discussed resulting from the updated obstruction analysis. The FAA evaluated the current state of the project supported the original FONSI on March 31, 2022. Note that the obstruction analysis was updated after the FONSI was issued which is the prime reason for the slight change in the acreage of vegetation management. Throughout the EA, only an approximate acreage was used to define the project alternatives as provided in the below citations from the EA.

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

Runway 2 – Approximately 20 acres of tree removal from within the Threshold Surface and Approach Surface Areas and additional selective removal in the Transitional Surface Area. All from within the adjacent 80-acre floodplain forest.

Runway 20 – Approximately 7 acres of tree removal from within the Threshold Surface and Approach Surface Areas and an additional selective removal in the Transitional Surface Area. All from within the adjacent 80-acre floodplain forest.

Runway 11 – A few scattered tree removals from adjacent commercial properties

Runway 29 – Three acres of tree removal and selective tree removal from within the Threshold Surface Area, Approach Surface Areas, and the Transitional Surface Area within the adjacent 80-acre floodplain forest adjacent to the dike”.

“This alternative would result in approximately 30 acres of tree removal and selective tree removal on 7 individual parcels, compared to 74 acres for the Full Obstruction Removal Alternative. This alternative also avoids tree clearing in residential areas, including Old Wethersfield”.

The estimates turned out to be quite accurate, since the preferred development alternative of the EA stated an approximate 30 acres of management, and the final, detailed calculated area is 33.8 acres. Additionally, a review of the planning-level mapping contained in the EA shows the vegetation management areas that were anticipated for the project and thus evaluated for environmental impact. The final design has substantial compliance with those planning-level management areas on both sides of the CT River. Only in the Runway 29 approach is there a small area of tree pruning necessary on the east side of the river that was not included in the EA. This pruning of approximately 40 trees on the east side of the river within the RW29 approach has since been evaluated in detail by the CT DEEP for both wetlands and rare species impacts and found to be compliant with the associated regulations.



**Reference:** Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
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Of importance is that the final, detailed project design followed the “modified development alternative” of the approved EA limiting the vegetation management work to those protected airspace surfaces that were deemed critical during the obstruction analysis evaluation. The present design does not include the wider Part 77 surfaces which would have involved over 70 acres of vegetation management. The design is consistent with the intent of the EA and FONSI and the slight changes in management area do not represent an expansion of the project or cause impacts to new environmental impact categories. Rather, the slight change in area represents the expected change in project-related calculations as a project goes from the planning to the design stage.

11. *The FONSI was issued in August of 2018. Why wasn't a written reevaluation conducted as required by the FAA?*

CAA Response: See the responses provided for the above comment.

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#### 11. Public Hearing Testimony Thursday 12/15/2022

From: Amy Morrin Bello,  
State Representative  
28<sup>th</sup> District

Editor's Note: A verbal summary of a submitted letter was provided by Rep. Morrin Bello during the public hearing. The comments from the letter are address in Item #7 of this RTC document and can be found on page 11.

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#### 12. Public Hearing Testimony Thursday 12/15/2022

From: Cynthia Greenblatt

Editor's Note: A verbal summary of a submitted letter was provided by Ms. Greenblatt during the public hearing. The comments from the letter are address in Item #10 of this RTC document and can be found beginning on page 17.

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**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

### 13. Public Hearing Testimony Thursday 12/15/2022

From: Thomas Regan-Lefebvre

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

Comments regarding aircraft operations over Old Wethersfield. (not pertinent to the IWWA permit application)

*Comments regarding the status of the airport.* (not pertinent to the IWWA permit application)

*Comment requesting an additional meeting for additional information.*

*Comment regarding tree cutting on the East Hartford side of the river.*

**CAA Response:** The opportunities for public input and for obtaining project information were summarized by the CT DEEP in an email of 11/15/22 from Janice Deshais to Cynthia Greenblat. The commenter is referred to the response for Comment 7 on page 12 of this RTC document for information regarding the opportunities for public input and information.

Tree management on the East Hartford side of the Connecticut River was found to be necessary as a result of the airspace analysis, the methods and results of which were provided during the public hearing presentation. Only hand pruning of the trees in East Hartford are proposed, with maximum expected survivability of those tree targets. We believe the selected management method to be the least impactful for that particular vegetation management area and provides adequate sensitivity for the protected environmental resources in that area including wetlands and state-listed rare species. No long-term impacts from the pruning operation in East Hartford are anticipated from this minimal management effort.

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### 14. Public Hearing Testimony Thursday 12/15/2022

From: Rhea Drozdenko - River Steward, Connecticut River Conservancy

**Editor's Note:** A verbal summary of a submitted letter was provided by Ms. Drozdenko during the public hearing. The comments from the letter are address in Item #8 of this RTC document and can be found beginning on page 14.

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**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

#### 15. Public Hearing Testimony Thursday 12/15/2022

From: Jack Hale – Chair City of Hartford Tree Advisory Commission

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*My concern is that there is not. There has not been an opportunity to get questions answered. And that goes right back to the beginning of this business in 2017 like hearings that occurred. We're held on the same basis as this. People would talk and we could make statements. But we couldn't get any answers to questions. So, in order to move this process along in a reasonable way with the input of citizens, there needs to be some way for us to get answers.*

**CAA Response:** The opportunities for public input and for obtaining project information were summarized by the CT DEEP in an email of 11/15/22 from Janice Deshais to Cynthia Greenblat. The commenter is referred to the response for Comment 7 on page 12 of this RTC document for information regarding the opportunities for public input and information. This RTC document and the public hearing materials address many of the questions posed by concerned citizens as well.

*...we've got this planting plan using willows and dogwoods, maybe other stuff that's a an improvement over what the project looked like 5 years ago but I notice that the density of planting varies from one part, one area to another, and I don't see any explanation of why that is, or what the thinking is that would be good to know about.*

**CAA Response:** The plantings involve the installation of vegetation live stakes and stickers only within 100' of the Connecticut River per the detail in Table 1. This will be conducted after one full growing season following obstruction removal (Year 2) with a success assessment and replanting in Year 4 as needed. We will use Year 5 for our success assessment year. Plantings are anticipated to be problematic, as the existing native groundcover layer and the anticipated rapid regrowth of cut trees will easily outcompete introduced vegetation.

Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)

**Table 1: Live stake/sticker planting ratios and totals for the various removal method zones within the 100-foot vegetated river buffer at the Runway 2, 20 and 29 ends at HFD**

Removal Method Zone	Total Area of Zone	Tree Stake Density	Shrub Stake Density	Project Totals
Manual Topping	74,331 SF	1/1000 SF	1/500 SF	74 Tree Stakes 148 Shrub Stakes
Mechanical – Snag Cut	225,606 SF	1/500 SF	1/300 SF	448 Tree Stakes 751 Shrub Stakes
Mechanical – Flush Cut	23,046 SF	1/200 SF	1/100 SF	115 Tree Stakes 230 Shrub Stakes
Total Buffer Zone Plantings 3 Runway Ends		<b>637 Tree Stakes 1,129 Shrub Stakes</b>		

*If the CAA is waiting for their permit from CT DEEP. Are they going to be able to do this project this year? I haven't heard anything about what the expectation is as far as the time period for CT DEEP to grant the permit.*

CAA Response: Receipt of a permit from CT DEEP in mid-January 2023 will allow for completion of the vegetation management work this year presuming some period of favorable site conditions. Given the known airspace obstruction condition it is urgent that the work be completed as soon as possible.

*Another issue is that Hartford requires a permit in order to cut any trees on public land. they have the airport authority has not requested a permit. And I'm curious. Maybe Bianca knows this. whether the state permitting preempts the city requirement.*

CAA Response: The state of Connecticut, in recognizing the primacy of the federal and state governments in dealing with airports and aeronautical activities, preempt local zoning and other regulations where airports are concerned. The purpose of this is to allow the entity with state authority over the airports—for years the DOT and now the CAA—to, among other things, maintain safe airport approach lanes by restricting the height of trees and other structures on land in those approach surfaces so that safe flight conditions are not endangered. Refer to section 15-91 of the General Statutes of Connecticut. The City of Hartford's own Zoning Regulations also recognize the primacy of aeronautical authorities, in this case the CAA, and airport zoning regulations to restrict the height of trees and other structures on land in airport approach surfaces. Refer to Section 3.0. D. (1). The CAA is vested with the primary authority to determine the safety of the aircraft approach lanes, and this includes determining which trees need to be trimmed or removed.

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

*I'm also concerned about the flooding impact. We know that that area is going to flood, and we know that all else sticks are going to float so it'll have some effect there, and I want to know what people think it is about that.*

CAA Response: The project specifications require the contractor to dice project limbs generated by topping/pruning into sub-3' sections. Additionally, the wood generated by the topping/pruning portion of the project is of a smaller diameter, consisting of only the upper limbs and not the larger trunk sections. Inspection of the floodplain over the past three years revealed significant natural wood debris from the site and upstream sources each year; a naturally occurring event that will persist with or without the project. Our specifications have included the removal of all mechanically generated debris using a crane to lift the cut trees over the levee. With these measures, the project is not anticipated to exacerbate the Wethersfield Cove problem of annual, river-generated wood debris from the significant upstream wooded floodplain acreage that extends through a 4-state area.

*Then if we're assuming a 10-year maintenance revisit (of the airspace project). We need to know what they're (the CAA) is going to do.*

CAA Response: The CAA will routinely assess the protected navigable airspace conditions at HFD and determine compliance with the FAA regulations and design criteria. When conditions warrant, the CAA will plan and design additional obstruction removal efforts. Appropriate coordination and permitting will be conducted by the CAA for each project based on the magnitude and location of each airspace obstruction removal and maintenance project.

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## 16. Public Hearing Testimony Thursday 12/15/2022

From: James Woodworth – Stewardship Chair Great Meadows Land Trust

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*...the replanting plan. I haven't seen it. Evidently, it's out there, Mr. Hill. You've seen it. I have not even seen it, but I am a stewardship chair with the Great Meadows Conservation Trust and have a great deal of interest. I've walked the area numerous times, and so I know it's out there. I know I've seen those so that tree you showed Mr. Christiansen with the (multiple-stemmed) growth. It was cut 40 years ago as a stump cut, and now it's 40 years tall and again the same question; what's going to happen at 10 years? And I'm disappointed that you're not trying to make the transition from the fast-growing maple, silver maples to willows, or some other species that aren't going to grow so fast. But again, it would be nice to have to see that that planting plan, and then have those questions answered.*

CAA Response: Mr. Woodworth's testimony at the public hearing, and other input he's provided over the planning phase of the project is much appreciated since it recognizes the need for a more comprehensive approach to vegetation management at airports to minimize the need for follow-up projects as the same

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

vegetation regrows into the airspace. Vegetation management plans or VMPs are the typical approach to airport vegetation management at many airports throughout the country. Note that typical vegetation management projects at airports are based on a Vegetation Management Plan (VMP) which seeks to promote low-growing vegetative communities of native plants which respect environmental considerations while avoiding species that grow into the protected airspace. A VMP analyzes the protected airspace throughout the airport while concurrently assessing the present plant communities (dominant species, mature heights, soil conditions, etc...). The VMP then prescribes the target plant community and a long-range plan (typically 5-7 years) to achieve the desired result through a combination of mechanical and chemical vegetation control methods. A VMP typically requires extensive mechanical removals of undesirable species in the first year, followed by various maintenance efforts to protect and enhance the target low-growing native plants while eliminating regrowth of the taller natives and the invasive plants.

In the case of HFD, development and implementation of a VMP of this scale was not feasible given that the work is to occur primarily on easement parcels where the easement language differs between easement parcels and provides strict limitations on the vegetative targets that can be removed, and the means/methods of removal. Additionally, the rare species issues along with the extreme limitations placed on the CAA regarding equipment access and wood removal has further complicated the VMP approach to the project design. In an effort to obtain necessary permits to complete this work, a more subdued removal project has been designed which addresses immediate airspace needs. A negative aspect of this approach is that the project longevity will not be that of a true VMP. Stantec staff have developed VMPs for more than 20 airports and believe strongly in this approach to managing airspace obstruction issues. However, given the number of barriers to a true VMP approach at HFD, along with the extent of airspace penetrations already present in the runway approaches, the present design is a reasonable compromise at this time.

We note that the planting plan is available in Attachment 14 of the IWWA permit application but is summarized in Table 1 of the CAA Response provided for comment 15 on page 24 (above). The plan is limited in scope to a 100-foot zone bordering the riverbank and is intended primarily to promote bank stability through the expansion of black willow growth on the site (willow root structure is superior for soil stabilization over the typical silver maple form). Stump regrowth will be primarily responsible for the revegetation of the mechanical work areas, while little (if any) revegetation is needed in the topping/pruning zones since little change in the plant community is anticipated in those management areas.

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## 17. Public Hearing Testimony Thursday 12/15/2022

From: Jennifer Regan-Lefebvre

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*So, I am a resident in Old Wethersfield, and I am opposed to any tree cutting, and, in fact, any concession that expands branded airport or gives it more room to maneuver. And that's because I don't believe that CAA is an honest broker. The summer one afternoon. It was a weekday. I was sitting outside. I counted 14 planes flying over my house in Old Weathers Field. In the space of*

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

*45 minutes reported this to the FAA. I don't mind the occasional plane flying over my house. So, this is not just simple nimbyism that I'm annoyed by the noise. What bothers me is that if HFD were following the rules, they wouldn't be flying over that route. So, I feel that they have been dishonest with us, and that they're not enforcing the rules that are already in place. I think there's a very strong community interest in maintaining trees and discouraging air traffic in this part of Connecticut. It is an area of great natural beauty. It's an area of great biodiversity, and it's an area of historic value and because I don't trust CAA to enforce its existing rules. I don't see why we should be permitting them to carry out this devastation to our woodlands. Thank you*

CAA Response: (No response provided; comments are not pertinent to the IWWA permit application)

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#### 18. Public Hearing Testimony Thursday 12/15/2022

From: Lindsey Rutka – Hartford Jet Center

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP. This particular testimony was quite muted in the audio recording and thus difficult for transcription.

My name is Lindsey Rutka with the Hartford Jet Center and am also a pilot at HFD for many years. I know the tree issues. This airport gets used a lot for medical transport, by Homeland security and we have a lot of students that are training for pilots and then go back out into the world. To have a harmony of environmentally challenging site with (the airspace) and tree trimming (is difficult). The few of us that have walked that site many times can appreciate the need to trim of trees and have equal (environmental) harmony and to keep the safety of the students and first responders.

CAA Response: This commenter was generally understanding of the airspace issues posed by the tree growth around HFD and in support of maintaining the airspace while balancing the environmental sensitivity of the area. The commenter expressed the many types of users at HFD.

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#### 19. Public Hearing Testimony Thursday 12/15/2022

From: Martha Kaneely (sp?) - Wethersfield

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

I just want to echo the comments especially of Representative Morrin Bello, and Cindy Greenblatt regarding the environmental impact of the tree cutting and the fact that this is such a long term

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

plan when there is a plan in play and an effort at the State level to examine the viability of HFD, or and whether it should be decommissioned, and the clear voice of Hartford in this, in saying that they do wish the airport to be decommissioned. And so, to make such a long term have a such a long-term impact on the floodplain forest, when there is this there is so much in flux with the airport. I was disappointed during the CT DEEP presentation I heard a lot about regulations. I heard nothing about a focus on environmental justice and Hartford is an environmental justice community. The airport itself represents an environmental injustice. It is of a bygone era that when there was nothing thought of placing an airport between a community and its greatest natural shared resource. Our greatest natural shared resource the Connecticut River. CT DEEP talks a lot about rectifying environmental and justice, but in order to that's just talking to talk, you gotta walk. You actually have to listen, to marginalize communities, communities of color, and to elevate those voices in this discussion and have respect for what they are saying, and let them help guide this process, which clearly has not happened to them. So, I oppose the plan as it is written, and would ask for the common sense measures, of course. Short-term safety, selective pruning and trimming of the trees, but we do not need these long-term decisions to make right now.

**CAA Response:** HFD has been constructed and maintained as a public use airport and has been substantially funded by the Federal Aviation Administration (FAA). Grants issued by the FAA for airport improvement projects contain grant assurances requiring airport operators/management to comply with FAA regulations and design criteria. Such compliance ensures continuity in operation and design at airports across the country, with public safety as the ultimate objective. The CAA, as the designated authority for HFD is subject to these grant assurances and will continue to diligently pursue compliance through proper channels. Such diligence includes the pursuit or necessary permits and approvals for maintenance and improvement projects. The CAA will continue to perform their duties as established by the Connecticut General Statutes as long as HFD remains a public use airport. Any studies by others of the future use of HFD is irrelevant to the everyday operation and safety compliance duties mandated by statute to the CAA.

Impacts to the forested floodplain and wetlands of the Connecticut River have been quantified in the IWWA permit application, and these impacts have been (and are being) considered by those environmental agencies and staff responsible for assessing such impacts relative to the regulations that have been established for each environmental statute. From the National Environmental Policy Act, through the Federal Clean Water Act, Connecticut Endangered Species Act and the Connecticut Inland Wetlands and Watercourses Act, this project has been assessed and modified as needed to achieve substantial agreement with the impact thresholds and limitations set by the various regulations and agencies.

The CAA has properly submitted application materials and coordinated with the designated staff to avoid, minimize and mitigate natural resource impacts resulting in the current project which achieves the overall objective of public safety (as established by current FAA regulations and design criteria) with environmental protection (as established by the various environmental protection agencies). The resulting project is not optimal for the CAA and the users of the Hartford-Brainard Airport, as it is not optimal for those agencies and citizens that do not support maintenance of the airport. The plan is a balance between sets of competing interests and is an attempt to balance these interests through the required permitting and coordination processes that have been established through Federal and State statutes (and associated regulations). While unpalatable to many, the project is addressing a demonstrated public safety issue that has been proven through sound engineering analysis using a methodology prescribed by a federal agency. The airspace geometry has been set by aeronautical engineers through FAA regulations and is dictated by the FAA to airport management around the country. The maintenance of this airspace is a requirement of



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those entities that manage public use airports and is not subject to interpretation or negotiation. It is under these requirements that the CAA has sought to maintain the airspace and runway conditions at HFD.

Harford and East Hartford are indeed Environmental Justice (EJ) communities as identified by the most recent EJ mapping performed by the CT DEEP. For Federally funded airport projects, the FAA has established impact thresholds for many protected environmental resources as a part of their National Environmental Policy Act (NEPA) regulations as found in FAA Orders 5050.4b and 1050.1f. Where significant impacts to a particular category are (based on the FAA's significance thresholds), then the EJ communities are to be considered for any disproportionate impacts. A review of the NEPA Environmental Assessment (EA) (and resultant Finding of No Significant Impact or FONSI) found no exceedances of protected environmental resource categories and thus no violation of their EJ regulations. The FAA found, through their review and approval of the EA, that the impact categories (particularly wetlands and natural communities) could be suitably mitigated to stay within allowable impact thresholds. Furthermore, the approvals of the more detailed project plans by CT DEEP substantiates the FAA's NEPA findings. Even at the State level, the impacts to wetlands, floodplain and wildlife (include state-listed species) are within acceptable levels when minimization and mitigation measures are applied. The CAA maintains that through these established procedures, the matter of avoiding disproportionate impacts to EJ populations has been satisfactorily addressed.

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## 20. Public Hearing Testimony Thursday 12/15/2022

From: James Sanchez – Hartford City Council

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

Thank you, ma'am. I appreciate it and thank you for all the presentation from the CAA and also from Bianca and the CT DEEP.

I'm a Hartford City Councilman and I am the chair of the planning economic development and housing, and this resolution for the aviation easement went through my committee. I reluctantly had this passed but we did amend the easement with 3 or actually 5 options. And it's not options. It's restrictions. With that, said I would like to thank everyone here who understands that the dynamics of what the airport may be in the near future. We have 1.5 million dollars that has been allocated to have an airport feasibility study completed for the Brainard Airport, so that we can best use it for our community and the region in a better way. Now, with that said, I am saying that, and I will echo everyone, especially Jack Hale, we have no understanding of what plans are completed (for the project). Or what plans are out there to address this (airspace) issue. Now, someone here mentioned about certain trees. There are several trees that are under the flight path that have no reason to be cut down. Now I like to see a plan where they can identify the specific trees that are in the flight path so that we can make sure the pilots are in the safe zone for landing and takeoff. My issue here is that where are those plans? They have not been shared at

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

all and that's a real concern. It's my experience with the MIRA facility as well and I know this has nothing to do with the MIRA facility. But Jennifer said it right, there is no accountability here when it comes to the CAA and identifying themselves and being accountable for what they're doing, or what they're sharing, and the information they're sharing is actually limited. So, I would implore that the authority has the CAA share every single plan with all the stakeholders that's involved. I appreciate your time. Thank you. I appreciate your time, and I appreciate everyone that spoke up. Thank you.

**CAA Response:** The concerns of Councilman Sanchez regarding the availability of project-related information and documents is only partially addressed by our response to similar concerns expressed by others and included in this RTC document. We refer the Councilman to our response to Representative Morrin Bello (see Comment #7 on page 12 of this document) regarding available information and public input. The commenter is directed to the CAA website for copies of the NEPA Environmental Assessment, the IWWA permit application, and the CT DEEP public hearing presentation materials pertaining to the proposed removal of airspace obstructions. These materials provide the full context of the project from the planning phase (2017 NEPA Environmental Assessment) to the most current project plans (the public hearing materials). Included with the public hearing package and the IWWA application are plans showing the obstruction analysis in both plan view and cross-section. The cross-sectional data is particularly educational in that it shows the obstructing trees relative to the elevation of the critical airspace surfaces at HFD. We have found the cross-sections to be quite helpful in demonstrating the purpose for the project to those members of the public that have no background in aviation. We urge members of the public to access the CAA website at <https://ctairports.org/airports/hartford-brainard/planning-engineering/> and download these materials. This RTC document will also be placed on this website after 12/29/22.

At the City level, the CAA has been working with the City of Hartford DPW on the design of the obstruction removal project since our initial site visit with DPW staff on April 6, 2021. Detailed plans and information on the preliminary design were provided to the DPW and Greater Hartford Flood Commission in March, 2022. The GHFC process was subject to a public notice and public meeting and continuous coordination with DPW staff occurred between the application submission date and the present day. Concurrently with the GHFC process, the CAA was working with the City on the review and modification of the Airport easement language to negotiate a suitable solution for updating the easement. The easement process was managed by City officials with full access to CAA management. The easement process offered another avenue for information regarding the Airport and the project. Any request by a City official for information would have been acted upon by the CAA. We remain available for any questions you may have.

Councilman Sanchez recommends delaying airspace maintenance until the completion of land use studies involving the Airport. HFD has been constructed and maintained as a public use airport and has been substantially funded by the Federal Aviation Administration (FAA). Grants issued by the FAA for airport improvement projects contain grant assurances requiring airport operators/management to comply with FAA regulations and design criteria. Such compliance ensures continuity in operation and design at airports across the country, with public safety as the ultimate objective. The CAA, as the designated authority for HFD is subject to these grant assurances and will continue to diligently pursue compliance through proper channels. Such diligence includes the pursuit or necessary permits and approvals for maintenance and improvement projects. The CAA will continue to perform their duties as established by the Connecticut General Statutes as long as HFD remains a public use airport. Any studies by others of the future use of HFD is irrelevant to the everyday operation and safety compliance duties mandated by statute to the CAA.

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Regarding the analysis and selection of airspace obstructions for management, we reiterate the response from several commenters involved with this process. The HFD airspace analysis was provided in slides 10-18 of the public hearing presentation and in Attachment 14 of the IWWA permit application. The airspace analysis used a target of 15' below the protected airspace elevation to map potential obstructions; these are shown as white tags in the analysis. In designing the vegetation management project, the engineer then used included all blue tags (5-10' below the airspace elevation) and the green tags (0-5' below the airspace elevation) to determine the limits of each management area. White tags (10-15' below the airspace surface) were included for pruning only when they were in closer to the runway end and were a tree species capable of obstructing the airspace at a particular location. Note that all white tags are not included in the project (see slide 25 of the public hearing presentation). Careful consideration was given to each vegetation management area and the lower trees within those areas. Trees 10-15' below the surface were included only where field analysis revealed probable near-term obstruction. Note that the airspace data is now three years old with significant growth occurring during this time period. It is reasonable to expect tree growth during the past three growing seasons where formerly white tagged trees are now much closer to obstructing the airspace. The photogrammetry is only a snapshot in time, and trees continue to grow after the data are collected. Significant project delays to address permitting must recognize this potential growth of trees into the airspace since the 2019 flight. Past experience with similar projects strongly suggests additional obstructions will be present at the Airport due to additional growth.

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## 21. Public Hearing Testimony Thursday 12/15/2022

From: Clare Meade

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*We heard early on that safety is the fundamental of this plan. I have a comment/question about that on the Wethersfield Noise Abatement Committee. We learned that July, August, September had the highest level of flights ever in the history of recording tracking those flights. Given that number of flights, CAA has supported that, in spite of the quote significant penetration of trees into the airspace which currently exists, if they're able to support those flights at that level. But I understand the downside to waiting until after the (CT State) legislature's study on Brainard, the results of which come in in September, and this this tree work would then be taken care of next year after we know the results of that. Thank you.*

CAA Response: The presence of tree obstructions to the critical approach airspace at HFD has been clearly demonstrated in the IWWA application and in the public hearing materials. The airspace geometry and the definition of airspace obstruction are established by FAA regulations and design criteria and are not subject to interpretation by individual airport management teams. The project "purpose and need" has been well established by the CAA and documented in the IWWA permit application. Removal of the obstructions to these particular airspace surfaces are required by FAA regulation. The CAA, as the designated agency for maintenance and operation of HFD is required to comply with these FAA regulations. Obtaining the

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

IWWA permit is a part of the CAAs due diligence in addressing the regulation and removing the airspace obstructions so the airport may be returned to a proper condition as defined by the FAA.

The comment includes a reference to delaying airspace maintenance due to on-going land use studies. HFD has been constructed and maintained as a public use airport and has been substantially funded by the Federal Aviation Administration (FAA). Grants issued by the FAA for airport improvement projects contain grant assurances requiring airport operators/management to comply with FAA regulations and design criteria. Such compliance ensures continuity in operation and design at airports across the country, with public safety as the ultimate objective. The CAA, as the designated authority for HFD is subject to these grant assurances and will continue to diligently pursue compliance through proper channels. Such diligence includes the pursuit of necessary permits and approvals for maintenance and improvement projects. The CAA will continue to perform their duties as established by the Connecticut General Statutes as long as HFD remains a public use airport. Any studies by others of the future use of HFD is irrelevant to the everyday operation and safety compliance duties mandated by statute to the CAA.

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## 22. Public Hearing Testimony Thursday 12/15/2022

From: Eric Albrecht

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*Good evening. Thank you very much for the opportunity to speak. I'd like to primarily reiterate. I along with Jennifer, am a resident of Old Wethersfield. I can confirm that very frequently see planes going directly overhead. And I understand this is primarily an environmental issue as relates to the CT DEEP (inland wetlands) and the removal of trees. But in addition to the noise that's generated by these planes, my understanding is that the vast majority of these planes utilize engines that burn very high levels of leaded fuel, which you know, within the country we've removed leaded fuel from automobiles, for its safety and brain development impact on children. And yet we have these planes flying over our homes on a regular basis, emitting large levels of leaded fuel, and I haven't heard anyone talk about that, or consider it. But it's something that I think, needs to be addressed particularly as part of an environmental study and that's about all I really wanted to add. Thank you very much.*

**CAA Response:** The use and storage of aviation fuels is conducted at HFD according to applicable federal and state regulations. Compliance with these laws developed by various environmental and transportation government agencies is a requirement of airport management throughout the country and is presumed to be adequately protective of the general public.

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Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

### 23. Public Hearing Testimony Thursday 12/15/2022

From: Gloria McLean

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*I'm just an ordinary citizen who is following the process and reading about it in the Hartford Courant today. As a matter of fact, and I just find it unbelievable that in this present time having lived in Connecticut for 60 years. We are talking about disturbing floodplains forests, cutting down trees, separating ourselves from the Connecticut River, all for the sake of the airport in question. is this really where we should be going? We are already looking back on huge mistakes we have made in the past, such as hiding the Connecticut River from view. we are struggling to correct these mistakes now, and I just don't believe that we should be adding to them. I believe that conservation and preservation, not saving an airport should be a goal, and that.*

CAA Response: Minimization of the project footprint has been a focus of the CAA design for this obstruction removal project. The subject work within the floodplain forest was presented to the CT DEEP (Natural Diversity Database) staff responsible for the protection of state-listed rare species for assessment of the habitat modifications relative to the critical habitat characteristics of the various life stages of the subject species. Issues were identified by the CT DEEP staff that required project modifications to avoid impacts to these species, including bald eagle protection. These modifications, including strict project timing requirements, limits of mechanical removal near waterways, the control of invasive plant species and the need for revegetation of the riverbank, were addressed to the satisfaction of the CT DEEP staff. Furthermore, the limiting of "flush cut" tree removals in favor of "snag" cut removals in the mechanical cutting zone further reduces the changes to wildlife habitat on the site. The CAA specified a significant part of the 33.8-acre work area to include hand cutting only, which will have virtually no impacts on wildlife habitat. These measures have been included in the project to minimize impacts to wetland functions and values, including wetland-related wildlife habitat. The CAA has proposed these measures to the CT DEEP as a part of the IWWA permit application and the CT DEEP will evaluate these measures relative to the IWWA regulations and determine their adequacy relative to those regulations.

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### 24. Public Hearing Testimony Thursday 12/15/2022

From: Judy Keane

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

*I just like to touch on a few of the areas of concern to me and areas that I did not hear a lot talked about. And one of those is environmental concerns is the Folly Brook and the Wethersfield Cove entry are right next to this area, where they're going to be cutting down all these trees and leaving stumps. But it really seems to me, is so much of that debris is going to end up in that waterway. The access to the Wethersfield Cove in the past 15 years, has had many assaults and it cannot stand any more disturbance, and especially from trees and stumps, and whatever being rolled into the waterway.*

*This is an area of Wethersfield where animals and birds have multiplied in the past few years, and I really thought that that was one of the efforts of the environmental commissions in Connecticut to build up the eagles. The numbers of eagles in in our area or within the whole State, but they're doing so well right now in this particular area. Why would we take any chance of disturbing the nests? you know you can't determine where they're going to go. Next, nothing has been said about the aesthetics of all of this when you cut down trees. In the 1990s tree cutting was an absolute disaster and really stripped the riverbanks of all of the foliage.*

*And you know, for we want tourism. We want people to come to Connecticut. There's a whole commission just for that in Connecticut, and they're coming here to look at the trees. They're coming here to see the Fall settings, and we don't want to discourage that. The other thing is that whether in these microclimates might change (from the vegetation management). I have not heard a word about the effect on our climate in that area, and obviously, when you cut down trees. You have openings for sunlight to stream in, and it gets warmer.*

*Trees also absorb sound. We're all in the flight path of a Brainard Airport, which is terrible. The trees, I think, enhance some of the sound barrier for us, and with those gone we'll be hearing everything right away. And, by the way, somebody said something about the tree, the fire pilots will now be able to see the Putnam bridge. I would hope that every pilot flying out of that airport knows exactly where bridge is before they have to see it. You know we're talking about 150 pilots versus a town of 26,000. I think we need to get sensible. And restrict this tree cutting. Thank you.*

CAA Response: The CAA wishes to better describe the tree management adjacent to Folly Brook and the Wethersfield Cove as was presented in the CT DEEP public hearing (the presentation slides are available at <https://ctairports.org/airports/hartford-brainard/planning-engineering/>). The plans shown at the hearing reveal that the outermost limits of the vegetation management include the pruning of the uppermost branches of the target trees that are within the critical airspace. These branches will be accessed by climbers, felled to the ground, and then diced and scattered on the forest floor. The mechanical removal of trees is confined to the areas closer to the runway end. In these mechanical areas, the cut trees are to be removed from the site with the resultant stumps left in place. Regrowth from these stumps will begin the following growing season and will continue. Up to 8' of regrowth should be anticipated from these stumps after two growing seasons. No stumps are to be removed or treated as a part of this project, and nearly full survivability of the stumps is anticipated.

The comment relative to the protection of the active bald eagle nest near the Airport was addressed through coordination with the State eagle biologist. The coordination required setbacks and time of year constraints in the project conditions to ensure the continued use of the nest by the eagle pair. These conditions were forwarded to the CT DEEP staff responsible for issuing the IWWA permit, and they will be made a part of the overall project conditions.



**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

Relative to the noise cancellation trees provide for airport noise, we direct the commenter to Comment #6 on page 9 of this RTC document. Though not a wetland-related issue, we understand the concern and have provided some level of a response accordingly. We wish to emphasize that the project removes only a select area of obstructions within each runway approach surface and that significant stands of trees will remain between the Airport and Old Wethersfield.

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25. Public Hearing Testimony Thursday 12/15/2022

From: Cindy Jacobs

Editor's Note: An email summary of public hearing testimony was provided by Ms. Jacobs in an email to the CT DEEP dated 12/16/2022. The comments from the email summary are address in Item #6 of this RTC document and can be found beginning on page 9.

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26. Public Hearing Testimony Thursday 12/15/2022

From: Molly Deegan

Editor's Note: The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

I am a resident of Hartford, and I also am an employee for public schools. I'm the resident scientist at Mary Hooker Environmental Science Magnet School, and I teach to a population that is 50% Hartford students and 50% of students that live across the Connecticut River. And we of time talk about how our student body is connected based on our shared waterbody. It's kids of all ages, four through 13-year-old students about the watershed, and what impacts what we see. and each year the students identify a problem in their community and propose alternative solutions to the problem and see if they can make a difference in their community.

So, I just want to say thank you very much for your time to explain what's happening as a resident and a teacher, and somebody who's deeply embedded with many Hartford students' lives. I find that their families do not have time to go to things like this, and they are left uninformed and most affected. And as a resident myself, I feel very much opposed to this plan, as there are many things that are glossed over and framed in a fashion so that the people most affected may not really be part of the process. And I find that you know not very respectable way to go about things and I feel as though the glossing over of herbicides is a major concern of mine. If you're putting herbicides near waterways that is going to affect way more than just a plant it's going to affect wherever that herbicide flows into, and the soil is connected to the water. I'm also very



**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

concerned about what eagle nest setbacks based on guidelines means. I feel like that. Do not have much detail, and I would be curious to know more about that. And lastly, I would just like to say that I have a degree in environmental policy and in resource economics, and I am very concerned with equating values of things. So, if there is such a strong need for this case of emergency services. There better be more specific information regarding what those emergency services are, how many people they're servicing, and why the need is so great.

CAA Response: The use of herbicides on this project is limited to the control of the spread of invasive plant species that could occur due to the increased light penetration associated with the partial removal of the tree canopy. The short-term increase in sunlight penetration can benefit some invasive plants that are already present throughout the Connecticut River floodplain and on the project site. The low pressure, low volume, target-specific application of herbicides directly to cut stems will be performed by licensed, trained professionals that are permitted by the State of Connecticut to conduct this work. Furthermore, the control of invasives through herbicide use is a requirement of the CT DEEP Natural Diversity Database staff to protect state-listed plant species habitat present within the project limits. The CAA supports this project condition and will provide full-time supervision of the herbicide application team. The means and methods will be reviewed and approved by the CT DEEP staff prior to the work. Only means/methods will be used on the site that the CT DEEP has used successfully in similar situations. Overall, herbicide use at HFD is limited to the improvement of ecological conditions within the work areas by controlling invasive plant species. Target-specific techniques will be used which minimize over-spraying and minimize the volume of product used for this mitigation purpose.

The bald eagle nest referenced by the commenter was a project concern dating back to the NEPA Environmental Assessment stage of the project (2017). Since that time, the updated project design was submitted to the state eagle biologist for review and comment. Several modifications and conditions were placed on the project by the biologist to ensure protection of the eagle pair. These conditions are a part of the CT DEEP IWWA permit and include controls on the timing of the mechanical control portion of the work and maintaining adequate setbacks from the known nest location.

With regards to the commenters reference to the project's safety "purpose and need" we offer the following; the CAA has developed a project "purpose and need" statement for the IWWA permit application currently pending with the CT DEEP; this information was a significant part of the presentation made by the CAA at the CT DEEP public hearing on December 15, 2022. The Federal Aviation Administration (FAA) has established a regulatory framework for public use airports requiring airspace maintenance. The CAA has reviewed the condition of their airspace at HFD using the assessment methods prescribed by the FAA. The results of the assessment reveal that the approach surfaces are obstructed and require immediate attention. This is an airport maintenance task, and not an action promoting a change or expansion of runway use. Airspace maintenance is a primary task of airport management throughout the country and will continue to be an important component of airport planning at every public use airport.

The results of the airspace obstruction analysis were made a part of the IWWA permit application and were also a part of the public hearing presentation; both of which can be found at <https://ctairports.org/airports/hartford-brainard/planning-engineering/>. The CAA believes that the project "purpose and need" has been well established and documented in the IWWA permit application package.

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**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

## 27. Public Hearing Testimony Thursday 12/15/2022

From: Paula Izard

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*Thank you for this opportunity. I have to admit I'm relatively new to all this. I am a resident of Wethersfield, but I've just learned so much in the past year. So, about this important issue and I have to say I'm in agreement with the majority of speakers here tonight. Just listening to the comments there seems more questions than answers to so many of the concerns raised, and there's been major concerns raised. I think the cutting at this time should be held off until more information is forthcoming to these important questions, and that they are answered because once these trees are cut and removed. There's no going back. So, I thank you for this opportunity to speak.*

**CAA Response:** The commenter is directed to the CAA website for copies of the NEPA Environmental Assessment, the IWWA permit application, and the CT DEEP public hearing presentation materials pertaining to the proposed removal of airspace obstructions at HFD. These materials provide the full context of the project from the planning phase (2017 NEPA Environmental Assessment) to the most current project plans (the public hearing materials). Included with the public hearing package and the IWWA application are plans showing the obstruction analysis in both plan view and cross-section. The cross-sectional data is particularly educational in that it depicts the obstructing trees relative to the elevation of the critical airspace surfaces at HFD. We have found the cross-sections to be quite helpful in demonstrating the purpose for the project to those with limited background in aviation regulations and design. We urge members of the public to access the CAA website at <https://ctairports.org/airports/hartford-brainard/planning-engineering/> and download these materials. This RTC document will also be placed on this website after 12/29/22.

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## 28. Public Hearing Testimony Thursday 12/15/2022

From: Craig Raabe

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*I just want to thank the first 2 presenters. I thought they did a very good job of presenting a balanced and comprehensive proposal for what's going to go on here? I think that the cutting balances properly, the environmental needs and the needs for the airport and the FAA regulations, and it should go forward in that respect. Thank you.*

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

CAA Response: The CAA is in agreement with this commenter regarding the balance of the project design with environmental protection.

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## 29. Public Hearing Testimony Thursday 12/15/2022

From: Chris Kelly – Save the Sound

**Editor's Note:** The following was transcribed from verbal testimony and includes only that portion of the testimony pertinent to the Inland Wetlands and Watercourses Act. Some testimony was summarized and paraphrased for clarity. The original video and audio transcript are available through request to the CT DEEP.

*My name is Chris Kelly. I'm an attorney with Save the Sound. We are a regional, environmental, nonprofit organization, and we operate all throughout Connecticut as well in parts of New York. Save the Sound was involved in this process when the environmental assessment was issued about 5 years ago and issued comments at that time, and this is in many ways sort of a reiteration of that since this project has been brought back to the public fold for the first time in a while. Like what has been brought up with other organizations that spoke tonight our priority safety, and to the extent that you know, environmental damage is required in order to preserve public safety. Those are things which we have always gone along with.*

*I think the issue here, though, as many of the speakers have brought up is that many feel and have felt for a number of years that there hasn't been a sufficiently transparent and accountable process much of what has been discussed here, and the evaluations that have been provided to the public and documents which again was really about half a decade ago. We're also panned at the times, being insufficient and non-transparent. I was part of my own organization's comments at the time that there were a lot of issues in the EA that were not addressed. And it's unfortunate, because those issues can be pointed out, and there may be simple answers that can satisfy the public. But the if there isn't a response to that, then what you have is you foster an atmosphere of distrust, like what you continue to see in this meeting with a lot of the comments.*

*I do appreciate the involvement of CT DEEP Staff, who've been working on this behind the scenes. you know people like the presentation earlier, and you saw the timeline that there were different offices who were involved in helping to create these mitigation measures and establish standards. But what's really important is, even if you have those experts who are involved to the extent that CT DEEP has the authority to dictate those things. that there really is no excuse for they're not being more of a full public process to have a full public input on the plans and the details of the plan. So, they're put out there, and you know, to have a say in the disposition of their own natural resources. I'm a resident of the City Hartford myself. And the City of Hartford owns a lot of the land that the trees are being cut on. So, it really just stands to reason that residents of the City of Hartford should have a say. What happens to the trees that technically are jointly owned by them? If we had an opportunity to have more of a question and answer, or it'd be able to*

**Reference:** Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)

*respond more thorough in a written document. I, for one, would personally appreciate a lot of that as well, I think, with others there'd be a few things that probably address one of them.*

*So, there's been a lot of talk of obstructions to your navigation. I have a bit of background in FAA regulations and law, and what I would like to know is, there's a lot of talk about obstructions. But are there hazards to air navigation? Obstructions vary across the board standard hazards the area navigation, something that the FAA has looked at and actually said that this is a threat to danger that would be really important information to know, because when you throw around in terms of this is for safety, we don't actually know how specifically that applies to these trees.*

*Also, the public process could have included more discussion about how to offset the loss of these trees and the conditions in the wetlands. It's great to include mitigation measures. But by definition, mitigation measures, don't actually mean that we're making up for all the harm that's inflicted. It just means that we're minimizing it, but in reality, it would have been nice to have more of a conversation with the City about what could be planted elsewhere. What could be done to try and balance it out. Thank you very much.*

CAA Response: The concerns of this commenter regarding the availability of project-related information and documents is only partially addressed by our response to similar concerns expressed by others and included in this RTC document. We refer Mr. Kelly to our response to Representative Morrin Bello (see Comment #7 on page 12 of this document) regarding available information and public input. The commenter is directed to the CAA website for copies of the NEPA Environmental Assessment, the IWWA permit application, and the CT DEEP public hearing presentation materials pertaining to the proposed removal of airspace obstructions at HFD. These materials provide the full context of the project from the planning phase (2017 NEPA Environmental Assessment) to the most current project plans (the public hearing materials). Included with the public hearing package and the IWWA application are plans showing the obstruction analysis in both plan view and cross-section. The cross-sectional data is particularly educational in that it depicts the obstructing trees relative to the elevation of the critical airspace surfaces at HFD. We have found the cross-sections to be quite helpful in demonstrating the purpose for the project to those with limited background in aviation. We urge members of the public to access the CAA website at <https://ctairports.org/airports/hartford-brainard/planning-engineering/> and download these materials. This RTC document will also be placed on this website after 12/29/22.

The commenter suggests that citizens of the City of Hartford should have more control over the tree management activities at HFD. The CAA has been working with the City of Hartford DPW on the design of the obstruction removal project since our initial site visit with DPW staff on April 6, 2021. Detailed plans and information on the preliminary design were provided to the DPW and Greater Hartford Flood Commission in March, 2022. The GHFC process was subject to a public notice and public meeting and continuous coordination with DPW staff occurred between the application submission date and the present day. Concurrently with the GHFC process, the CAA was working with the City on the review and modification of the Airport easement language to negotiate a suitable solution for updating the easement. The easement process was managed by City officials with full access to CAA management. The easement process offered another avenue for information regarding the Airport and the project. The 1959 easement language for the Airport required the City to maintain the airspace according to FAA regulations. This maintenance was not conducted, prompting action by the CAA to modify the easement and advance the obstruction removal project. This matter has received significant attention by City management, and only recently has resulted in an update to the aviation easement on City property providing for CAA to conduct the proposed project.

**Reference: Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

The commenter questions the project “purpose and need” relative to the status of the obstructions to be removed in accordance with FAA regulations. As presented in the CT DEEP public hearing, the obstructions to be addressed are within the most critical airspace surfaces at the Airport, occurring in the runway approaches. Transitional obstructions (those airspace penetrations off to the “sides” of the runway environment and defined in Federal Aviation Regulations or FAR14 CFR PART 77 -SAFE, EFFICIENT USE, AND PRESERVATION OF THE NAVIGABLE AIRSPACE ) were assessed and deemed less critical than those in the Obstacle Clearance Surface and the Threshold Siting Surface. Indeed, penetrations of these approach surfaces are deemed the most critical in FAA Order 8260.3E -United States Standard for Terminal Instrument Procedures (TERPS) Revision Issued -September 17, 2020 and FAA Advisory Circular (AC) 150/5300-13B - Airport Design. Chapter 3 of the Airport Design AC provides information on obstacles to the various airspace surfaces and the required actions to address the obstructions. The critical surfaces at HFD that are the subject of this project, only significant and substantial modifications to the runway would provide for allowing the obstructions to remain. These modifications would essentially eliminate the use of the runway for current operations at HFD. Cross-sections of the obstruction analysis provided in the CT DEEP public hearing are helpful in reviewing the obstruction elevations versus the protected airspace. Slides 10-18 are pertinent to this discussion.

Regarding the project’s attempt to avoid, minimize and mitigate impacts to protected natural resources we offer the following. The project has included mitigation for potential impacts resulting from the removal of the canopy layer in areas of the floodplain forest along the Connecticut River and Folly Brook. Measures are also in place to protect state-listed species and wetlands. Mitigation measures included in the project include:

1. The project timing restricted to winter removal to reduce non-target plant mortality and to take advantage of frozen soils to reduce the potential for rutting, erosion and sedimentation.
2. Sensitive removal methods (hand removal) are proposed for those areas where only the canopy section of the target trees penetrates the protected airspace, thus limiting equipment movement on the site.
3. The use of a crane to lift wood debris from the site which will limit equipment movement through the wetland/floodplain and significantly reduce heavy equipment trips through the floodplain forest and over the protected flood control berm (Clark Dike). Heavy equipment movement in wetlands and floodplain is estimated to be reduced by over 60% through the use of the crane lift operation, and thus is potentially the most significant mitigation measure of the project.
4. Protection procedures have been prepared for protection of the state-listed plant species mapped within and adjacent to the work areas. Pre-project marking of plant colonies is to be completed along with education of the work crews. Where protected plants occur within the work areas, and pre-project transplanting plan will be employed to move the plants to adjacent suitable habitat.
5. Adequate setbacks to the active bald eagle nest have been provided based on guidelines developed per the Bald and Golden Eagles Protection Act.
6. A planting plan within a protective 100-foot buffer zone of the Connecticut River will be implemented to promote revegetation of the site.
7. A turbidity monitoring plan that includes a pre-project baseline measurement and during project sampling is included to monitor turbidity and suspended solids resulting from the flooding of the post-management work areas.
8. An invasive plant species control plan will be implemented during a 5-year period following vegetation management.

Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW Response to Comments (RTC)**

30. Email Comment : Tuesday, December 27, 2022 11:47 PM

Title: Please accept this testimony regarding Brainard Airport Tree Cutting

From: Alyssa Peterson <[alyssa.peterson@att.net](mailto:alyssa.peterson@att.net)>

Dear DEEP Representative,

Thank you for extending the time to allow commentary on the CT Airport Authority's REDUCED tree-cutting plan around Brainard Airport. This controversy has gone on far too long -- when there are "winners" on both sides, and we must get this conservation and public safety task accomplished ASAP.

FACT: The quasi-public CT Airport Authority (CAA) was legally required to conduct a public safety investigation and review of obstruction (trees) at Brainard Airport. The process was lengthy, comprehensive, and the resulting report was a healthy compromise: <https://ctairports.org/wp-content/uploads/2020/04/29067-OPM-HFD-EA-FONSI-ROD-2017.12.19.pdf>

FACT: Wethersfield residents were particularly successful during this public process, in limiting the acreage cut as demonstrated in visuals contained within that final report.

FACT: Hartford taxpayers also benefited because despite that we own the subject land and are responsible (\$\$\$) for clearing it per the 1959 deed filed on our land records (attached) -- the CAA is instead footing the bill for this project (over one million dollars).

FACT: The chair of the Great Meadows Conservation Trust, Jim Woodworth, clarified at public hearing(s) that the trees to be cut are NEW GROWTH from the time CT Dept of Transportation unlawfully clear-cut the area around 1990. But even those trees were new growth from prior cutting. There are no old-growth trees surrounding Brainard as understood from a century of aerial photography.

FACT: Mr. Woodworth both testified and submitted a proposal (see attachments) for planting new trees that are both slow-growing and low-growing, and that are strong enough to maintain the riverbank. All elegantly simple solutions. He mentioned a Black Walnut variety as an example.

FACT: I testified and congratulated Mr. Woodworth on such a rational approach. My comments also reflect my positions on Brainard Airport that haven't changed in years. That commentary is included.

FACT: Agendas of the CAA board and its committees reveal they previously took steps to sue our city (Hartford) and Luke Bronin for irrational positions and delays on this public safety project.

FACT: This isn't a legal issue, it's a proactive conservation and public safety issue WITH solutions.



Reference: **Hartford-Brainard Airport Airspace Obstruction Removal Project CT DEEP Inland Wetlands Application #202204934-IW  
Response to Comments (RTC)**

*I'm hoping the CT Dept of Energy and Environmental Protection will issue the permit immediately.*

CAA Response: The CAA is in general agreement with several points made by this commenter. The comment thoroughly documents the process by which this project has been modified to the present design before the CT DEEP. The CAA is hopeful that the modified project is clearly a balance between the environmental regulations and the aviation safety needs prescribed by the FAA and that there's general understanding that the City of Hartford was originally responsible for undertaking this airspace maintenance action per the 1959 easement that was attached to this commenter's email. That the CAA has stepped in to manage the airspace maintenance task has not been widely publicized and is not an important point to the IWVA process. Nevertheless, the airspace obstruction removal project at HFD is based on a regulatory mandate, and the project has been minimized and conditioned to reduce environmental impacts.

The commenter references the Vegetation Management Plan (VMP) concept that was advanced by Mr. Woodsworth of the Great Meadows Land Trust. As previously discussed in several comments in this RTC Document, Mr. Woodsworth's VMP idea is a central concept of airport vegetation management throughout this country. However, the presence of so many barriers to the VMP concept at HFD prevented the development, permitting and implementation of a VMP-type plan in the timeframe necessary to address the immediate obstruction removal need at HFD.

## **Comments and Responses - End**

**Notice of Comment Period**  
**Applicant: Connecticut Airport Authority**  
**Application No. 202204934-IW**  
**Hartford, East Hartford & Wethersfield**

The Department of Energy and Environmental Protection will accept written public comment on the above referenced application filed by the Connecticut Airport Authority for an inland wetlands and watercourses permit associated with the removal, topping, and pruning of trees over 33.8 acres of state inland wetlands which pose immediate and future obstruction hazards to Federal Aviation Regulation Part 77 surfaces, Terminal Instrument Procedures, and Airport Design Standards around Hartford-Brainard Airport to improve public safety and re-establish compliance with Federal Aviation Authority mandates.

**Written comments will be accepted until 5:00 PM on December 27, 2022**, a date which aligns with the Status Conference Summary provided to the Applicant and Petitioner. Written public comments should be submitted to the hearing officer at [janice.deshais@ct.gov](mailto:janice.deshais@ct.gov) or by mail to Janice Deshais, Office of Adjudications, 79 Elm St., 5th Floor, Hartford, CT 06106.

**Publication Date:** November 30, 2022

Approved By:



Brian P. Thompson, Director  
Land & Water Resources Division  
Bureau of Water Protection and Land Reuse

**ADA PUBLICATION STATEMENT**

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