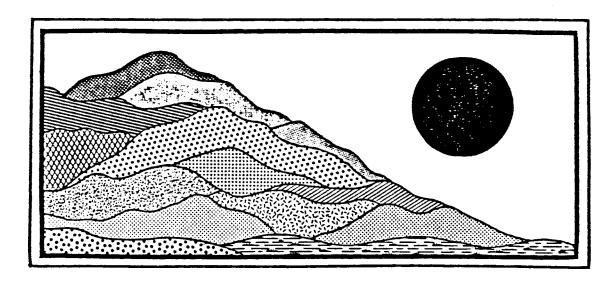
FALCON RIDGE

Stafford, Connecticut

AUGUST 1988



ENVIRONMENTAL

REVIEW TEAM

REPORT

FALCON RIDGE

Stafford, Connecticut

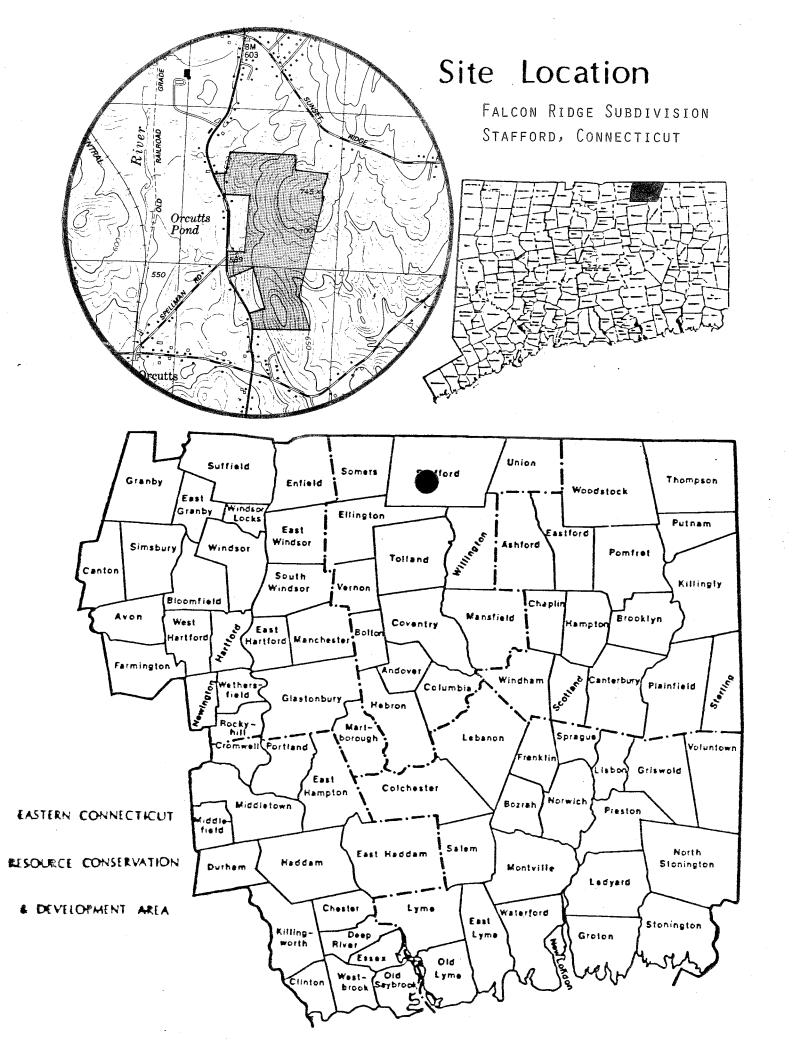
Review Date: JUNE 9, 1988

Report Date: AUGUST 1988



PO BOX 70

HADDAM, CONNECTICUT 06438



ENVIRONMENTAL REVIEW TEAM REPORT

ON

FALCON RIDGE SUBDIVISION STAFFORD, CONNECTICUT

This report is an outgrowth of a request from the Stafford Planning and Zoning Commission to the Tolland Soil and Water Conservation District (S&WCD). The S&WCD referred this request to the Eastern Connecticut Resource Conservation and Development (RC&D) Area Executive Council for their consideration and approval. The request was approved and the measure reviewed by the Eastern Connecticut Environmental Review Team (ERT).

The ERT met and field checked the site on Thursday, June 9, 1988. Team members participating on this review included:

Don Capellaro

Joe Neafsey

Jim Parda

Anthony Sullivan

Elaine Sych

Bill Warzecha

--Sanitarian -

CT Department of Helth

Services

--District Conservationist -

U.S.D.A., Soil Conservation Service

--Forester -

DEP, Eastern District

--Planner -

CT Office of Policy

and Management

-- ERT Coordinator

Eastern CT RC&D Area

--Geologist

DEP - Natural Resources Center

Prior to the review day, each Team member received a summary of the proposed project, a list of the Town's concerns, a location map, a topographic map, and a soils map. During the field review the Team members were given plans and perc test and deep test hole data, and drainage calculations. The Team met with, and were accompanied by the Zoning Enforcement Officer, a Health District employee, the applicant and his engineer. Following the review, reports from each Team member were submitted to the ERT Coordinator for compilation and editing into this final report.

This report represents the Team's findings. It is not meant to compete with private consultants by providing site designs or detailed solutions to development problems. The Team does not recommend what final action should be taken on a proposed project—all final decisions and conclusions rest with the Town and landowner. This report identifies the existing resource base and evaluates its significance to the proposed development, and also suggests considerations that should be of concern to the developer and the Town. The results of this Team action are oriented toward the development of better environmental quality and the long-term economics of land use.

The Eastern Connecticut RC&D Executive Committee hopes you will find this report of value and assistance in making your decisions on this proposed subdivision.

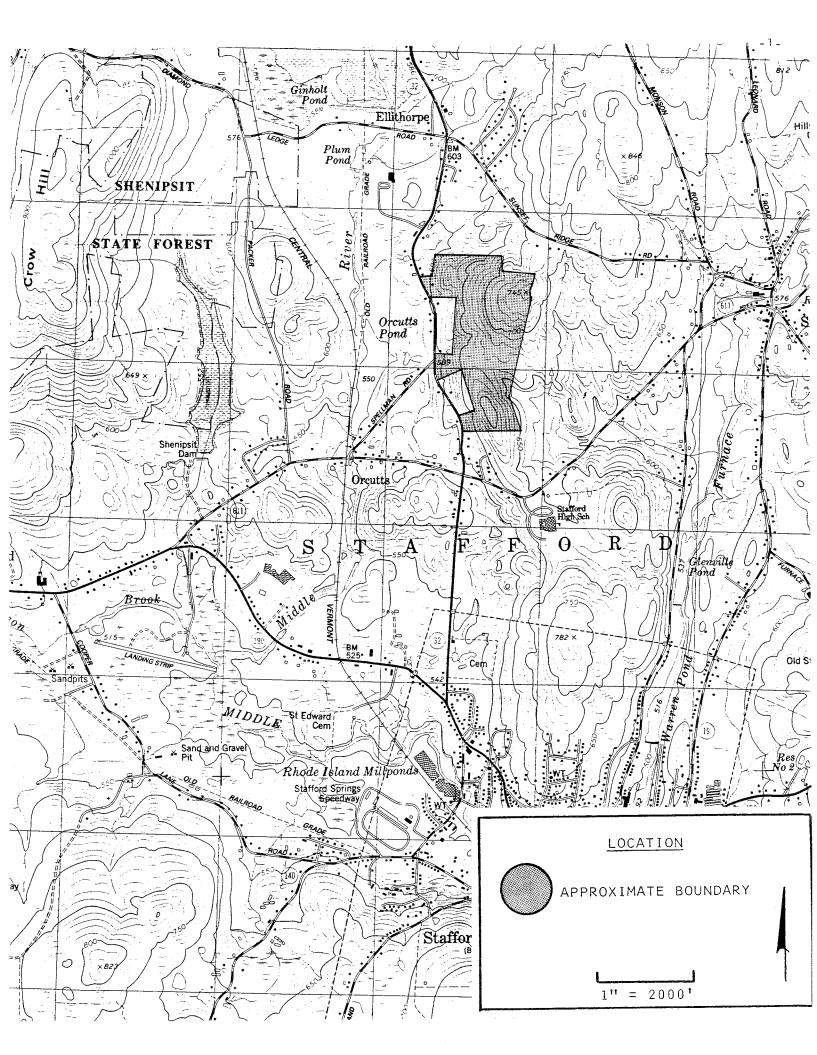
If you require any additional information, please contact:

Elaine A. Sych ERT Coordinator Eastern Connecticut RC&D Area P. O. Box 70 Haddam, CT 06438 (203) 345-3977



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1. INTRODUCTION, SETTING AND TOPOGRAPHY

The proposed 83 lot subdivision site consists of about 120 acres in northcentral Stafford. It is located on the east side of Route 32, about 2 miles north of Stafford Springs Center. The site is bounded on the north, south and east by private undeveloped land. Route 32 abuts the western boundary of the site. Phase I, which includes 11 lots has already been submitted. Preliminary plans were available for the remainder of the site.

The entire site is located in a General Residence AA zone, which allows residential development with minimum lot sizes of 40,000 square feet or about one acre. Lot frontage of 175 feet is also required. The interior sections of the subdivision will be served by a loop road system with several short cul-de-sacs. Only one access point to the property via Route 32 is proposed.

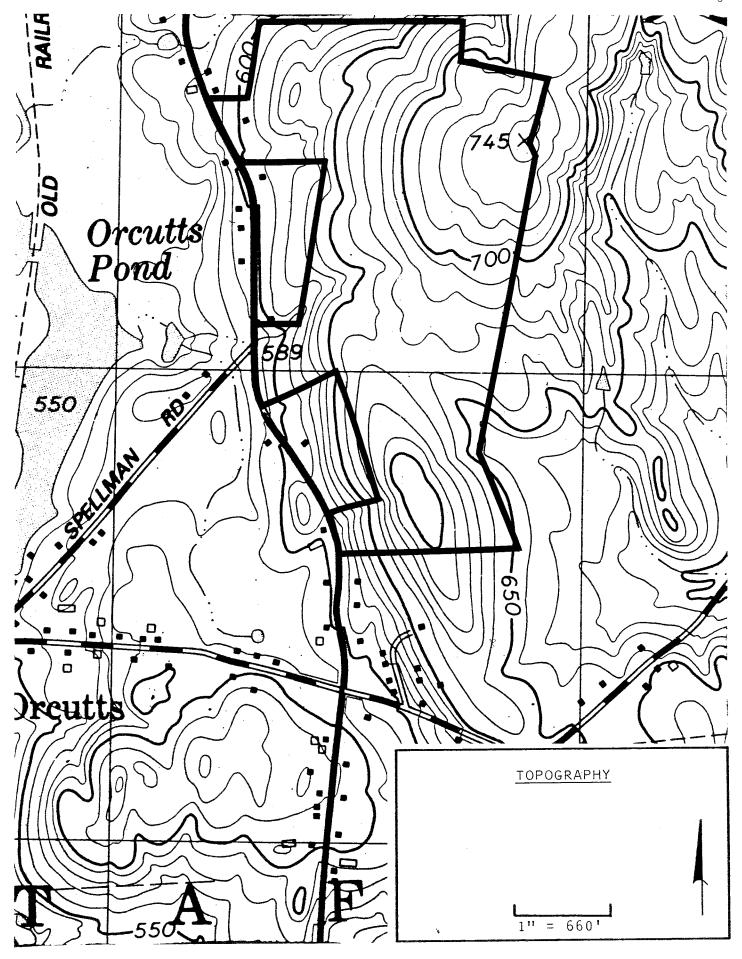
The proposed subdivision site is entirely wooded, consisting primarily of second growth hardwoods with some stands of conifers. Based on available mapping and the Team's fieldwalk, there does not appear to be any major streamcourses on the site. There are several seasonal drainageways that occupy topographic swales within the site and some wetland pockets.

The land surface on the site slopes generally upward from Route 32 to the eastern limits. The slopes are gentle to moderate. Steepest slopes are found in the western limits along Route 32. Site elevations range from a high of about 754 feet above mean sea level at the northeast corner of the site to a low of about 590 feet above mean sea level at the proposed entrance to the subdivision.

2. BEDROCK AND SURFICIAL GEOLOGY

The proposed subdivision site is located within the Stafford Springs quadrangle. A surficial geologic map (GQ- 1216 by M.H. Pease) for the quadrangle has been published by the U.S. Geological Survey. Only a preliminary bedrock geologic map exists for the quadrangle at the present time. The Team's geologist referenced the $\underline{\textbf{Bedrock Geological}}$ $\underline{\textbf{Map of Connecticut}}$ by John Rodgers for the purpose of this section.

Geologic mapping data indicates that bedrock is close to the ground surface in the northeast corner of the property. Depth to bedrock in the latter area is probably 5 feet or less. While the remainder of the site is probably 10 feet or less.



Rogers (1985) identifies two rock types within the parcel; (1) Monson Gneiss and (2) Brimfield Schist. The western half of the site is underlain by Monson Gneiss while the eastern half is underlain by Brimfield Schist. Both rock types are metamorphic rocks which means they have been geologically altered by great heat and pressure. Gneisses are typically medium to coarse-grained rocks characterized by the relatively parallel orientation of mineral grains with massive to platy appearance. During the past, the gneisses have responded to geologic forces within the earth's crust by fracturing and forming distinct open joints. (See Water Supply section).

Schists, on the other hand, are characterized by the abundance and parallel orientation of platy or flaky (mica) minerals and by the ease of parting into thin layers. Unlike the gneisses described above, schistose rocks respond to geologic forces by slipping and folding along foliation (layered) planes. The joints or openings that develop in the schists are generally smaller and discontinuous compared to the gneisses. (See Water Supply section).

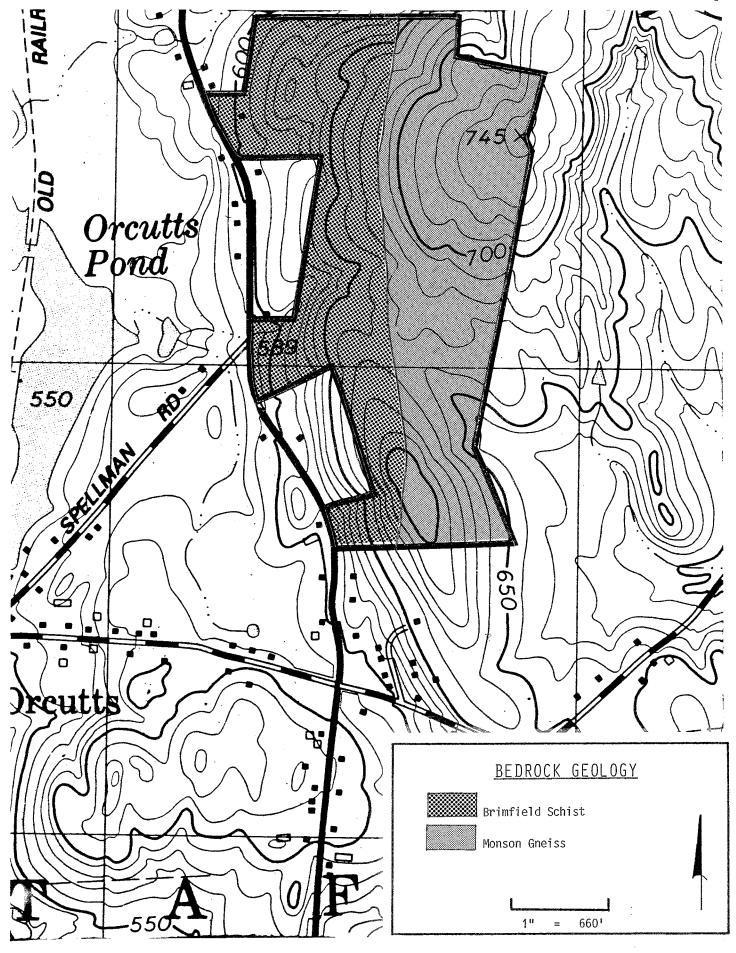
Although numerous large boulders were encountered in several of the deep test holes excavated for the first phase, ledgerock (at about 66" below ground surface) was encountered in only one hole. Shallow bedrock will probably not be a major problem, except for the northeast corner of the site.

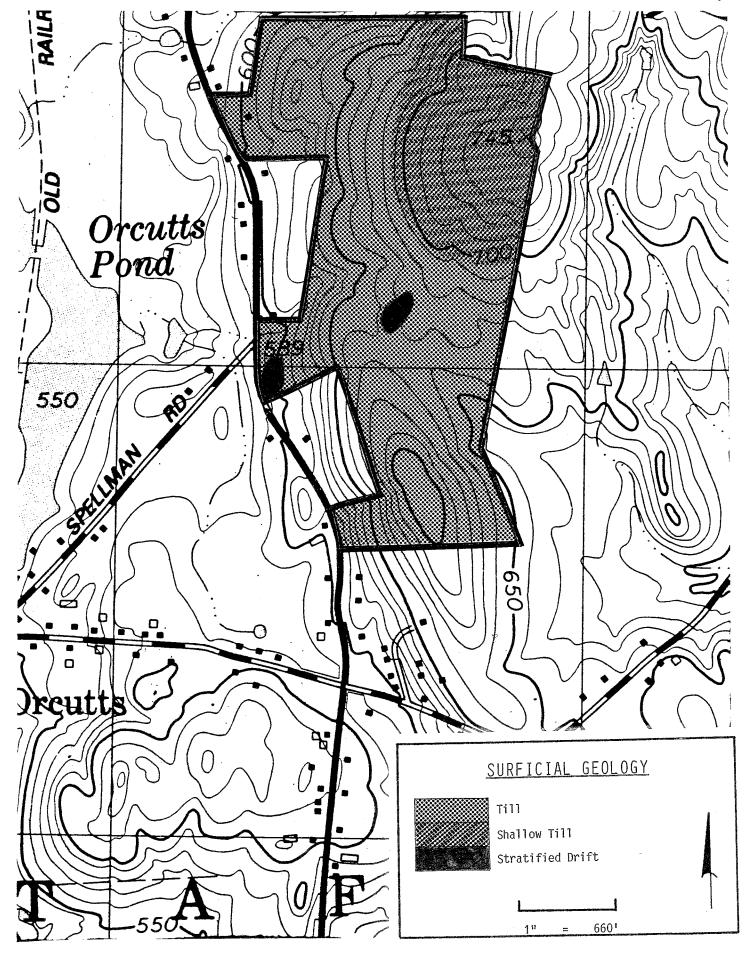
The underlying bedrock is a source of water to many homes in town and will be the principal source of domestic water to houses in the proposed subdivision.

Overlying the bedrock on most of the site is a loose, sandy glacial sediment known as Till. Till is a glacial sediment that was deposited directly from glacial ice. The sediment consists of varying proportions of sand, silt, gravel, clay and boulders. Particles of different sizes are generally mixed together in a complex fashion. According to the soil survey for Tolland County the texture of the till on the site is mostly sandy, stony to very stony and moderately loose. These soils are delineated mainly as Gloucester soils on the accompanying soils map.

It should be noted that two small areas of stratified drift deposits (sand and gravel) occur in the south central part. These deposits were laid down by glacial meltwater. Their areal extent and thickness are not believed to be of great magnitude.

Overlying the till soils on the site primarily along drainageways are regulated inland-wetland soils. Because these soils are wet for part or most of the year, they hold low potential for any type of development.





3. GENERAL SOILS INFORMATION

The information contained in the Soil Survey of Tolland County, CT appears to be adequate for planning purposes. If the Commission requires additional information it is suggested that the applicant retain the services of a qualified private soil scientist to review the information contained in the Soil Survey of Tolland County, CT, examine conditions in the field and provide the Commission with a verified map and up-to-date interpretive information for the site.

4. WETLAND BOUNDARY INFORMATION

It is suggested that the Commission require that the applicant have the wetland boundary information surveyed onto the plan map. The soil scientist should then review and sign a statement on the map(s) certifying that the information is substantially correct. The certification statement should be similar to the following:

"The wetland soils on this site were identified in the field using the criteria required by Connecticut P.A. 72-155 as amended by Conn. P.A. 73-571, Conn. P.Ā. 87-338 and P.A. 87-533. The boundaries of these soils and of identified watercourses are accurately represented on the plot plan."

This statement should be signed by the soil scientist who performed the field work.

If this procedure is followed and discrepancies are found, the Tolland County Soil and Water Conservation District can on request review the submitted information for adequacy.

It is also suggested that the applicant prepare an assessment of wetlands that will be affected by the proposed road crossing and detention basin. The assessment should consider impacts of the proposal on the wetlands as well as comment on the feasibility of any alternatives to the proposal. The Commission can then review this document, and use the information to base a permit decision on. The TCSWCD can on request review the assessment for adequacy.



Soil Conservation Service TOLLAND COUNTY USDA-SCS 24 HYDE AVENUE ROCKVILLE, CT 06066 875-3881



SCALE 1" = 1320'



5. HYDROLOGY

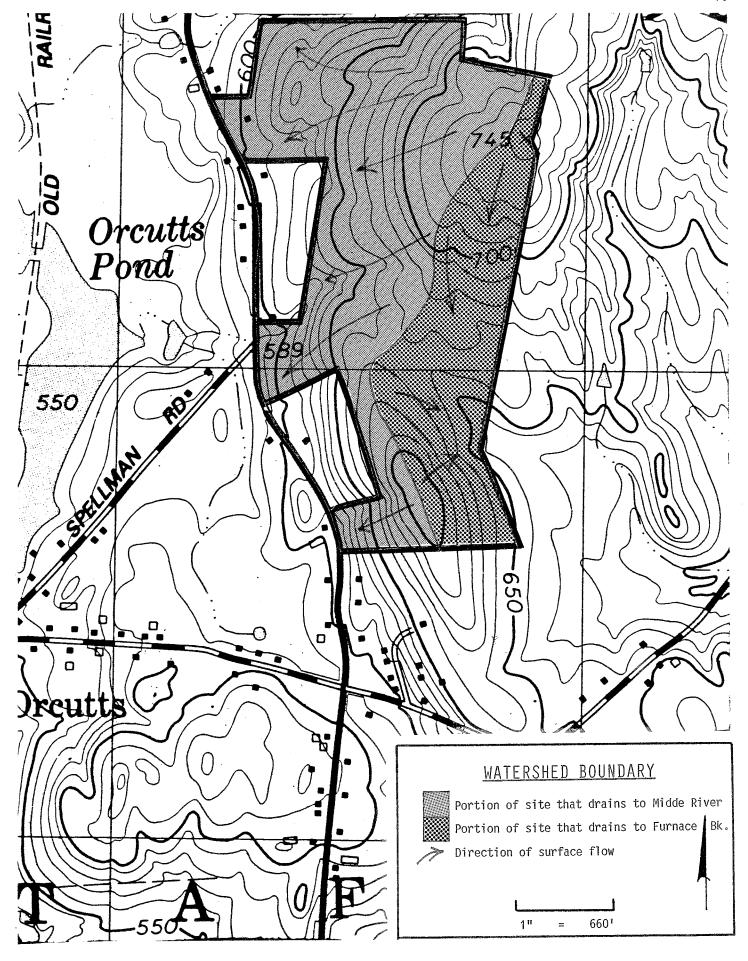
Except for about 42 acres in the eastern part, surface runoff and to a large degree groundwater flows westward toward Route 32. Once it is routed under Route 32, it flows westward to Middle River and Orcutts Pond. Surface runoff in the eastern part is routed to unnamed streamcourses which are east of the site and are tributary to Furnace Brook. The seasonal drainageways within the site act as conduits routing surface waters to the larger streamcourses mentioned above.

Development of the site for residential use would be expected to lead to increases in the amount of runoff shed from the parcel. amount of increases will depend upon the extent of development, the impervious surfaces created and the amount of vegetation removed or preserved. Present plans indicate that road drainage will artificially collected and outletted to drainageways, which, in turn, will route the stormwater to two proposed detention basin sites. The idea behind this plan is to accomplish zero increase in runoff following the development so that flooding problems do not occur and flooding problems to downstream. * One of the two detention basins will be located south of the proposed entrance to the subdivision (intersection Route 32 and Falcon Ridge Road). It does not appear that design information on drainage calculations have been completed for the second detention basin at the present time. Also, its location is not known. It is suggested that the project engineer reference Connecticut's Guidelines for Soil Erosion and Sediment Control for detention basin design, particularly Chapters 8 and 9. Consideration for the maintenance of detention basins, which may trap road sand and silt laden runoff during the following development is very important. Also, an access road for maintenance vehicles should be shown on the subdivision plan. (See Stormwater Detention Basin section).

The two major concerns associated with increased runoff are the potentional for downstream flooding and streambank erosion/gullying.

The developer of the parcel should analyze the lots individually and collectively. The need for detention basins should be based on density, amount of wetlands and associated storage and calculated runoff increases. If detention is warranted, it should be located where its effects would be maximized and its impact on the wetland minimized. It should be noted that a portion of the above mentioned detention basin is

^{*}cont. are not aggravated.



located within a regulated wetland area. As a result, a permit will need to be secured from the Town's Inland Wetland Commission. In reviewing a proposal, the Commission will need to determine the impact that the proposed activity will have on the wetland area. If the Commission determines that the wetland is serving an important hydrologic or ecologic function and that the impact of the proposed activity will be severe, they may deny the activity altogether or, at least, require measures that would minimize the impact. Ideally, if detention basins are required to handle post-development flows, they should be located on upland soils. However, because of topographical constraints in the area, it may not be possible to do this. Finally, all downstream culverts should be carefully examined, particularly those passing under Route 32. Once stormwater reaches the west side of Route 32, it should pose little or no problem because of the storage capabilitites of Orcutts Pond.

The other concern regarding increased runoff is the chance for streambank erosion and gullying. Connecticut's Soil Erosion and Sediment Control Act (P.A. 83-388) requires that the applicant devise a thorough erosion and sediment control plan. Because of the moderate slopes present on the site, the concern for potential erosion becomes apparent. A well managed activity will need to take all necessary measures to contain and filter disturbed water so that it does not cause environmental damage. The best solution for erosion and sediment control is to keep disturbed areas to a minimum. Following the construction of homes in the subdivision, catch basins, which easily fill with road sand, need to be maintained on a regular basis. Subdivision roads should be also be swept, especially in the spring following the road sanding season.

6. STORMWATER DETENTION BASIN

There are several concerns about the proposed detention pond:

- 1. The method used by the consultant engineer to determine peak discharges and total runoff volumes are not acceptable methods recognized by the Connecticut Guidelines for Soil Erosion and Sediment Control 1985. The consultant should refer to Chapter 9 of the Guidelines (page 9-1) for a list of acceptable methods.
- 2. The actual design of the structure should be based on the standard for Detention Basins found on page 8-67 thru 8-98 of the Guidelines. Special note should be made of the requirements for the selection of design storms (page 8-68 5.b.).

- 3. Details of the outlet structure and appropriate cross-sections of the dike should be shown on the plans.
- **4.** An operation and maintenance plan for the structure should be developed and provided to the eventual owner of the facility.
- 5. High groundwater levels in the wetland at the site of the proposed basin will require drainage to provide an adequate storage volume for the stormwater. The existing ground is at elevation 590. The proposed outlet structure has a flow line proposed at elevation 586. The 24" culvert under Route 32 was shown but no flow line elevation was shown. If the basin is located as proposed this culvert will have to be lowered to at least 586 minus the grade required for subsurface drainage. Side slopes of the basin may also require drainage to prevent bleeding and allow for maintenance mowing. The same will be required for the basin bottom.

7. SOIL EROSION AND SEDIMENT CONTROL PLAN

A detailed soil erosion and sediment control plan should be developed and implemented for this site. The plan submitted has several omissions and is too general. The plan should be developed using the criteria contained in the Connecticut Guidelines for Soil Erosion and Sediment Control (1985). The Tolland County Soil and Water conservation District would appreciate the opportunity to review the revised plan prior to final approval.

8. GEOLOGIC DEVELOPMENT CONCERNS

In terms of the proposed residential subdivision, the major hydrogeological limitations found on the parcel includes: 1) areas where bedrock is at or near the surface of the ground (mainly the northeast corner); 2) areas of moderate slopes; and 3) areas of permanent or seasonal wetness (regulated inland wetland soils).

These limitations will weigh heaviest on the ability to provide adequate subsurface sewage disposal systems serving homes constructed in the subdivision, since public sewers are not available. It seems likely that proper planning and engineering can overcome these limitations. According to deep test hole information provided for Phase I, it appears

that conventional septic systems can be constructed for most lots. For the remainder of the site, it is imperative that detailed soil testing be done on each proposed lot. Of concern is the northeast corner where bedrock is inferred to be relatively shallow. Several deep test holes in the area of proposed leaching systems will be necessary with forder to establish a good profile of the bedrock surface and to determine design criteria.

Prior to subdivision approval, the applicant, through his engineering firm, must show that each proposed lot meets the minimum soil standards in accordance with Section 19-12-B103e(a)(3) of the Public Health Code. Each lot should be able to hydraulically disperse the expected discharge from the homes' sewage disposal system into the site's natural soil layers per Section 19-13-B103e(a)(4) of the Code.

The process should be a coordinated effort between the design engineer and the local health district (sanitarian). For those lots that fall under "areas of special concern" identified by the State Public Health Code, plans for the design of the septic system (along with the placement of each on-site well water supply) must be prepared by a professional engineer and submitted to the health district for review and approval by their certified staff.

The final configuration of lots should not be approved until the health district is assured of the feasibility of each lot meeting all of the State Health Code requirements and above listed concerns.

Once septic systems are engineered and approved by the proper authorities (i.e., state and local health department), it is important that the systems be installed properly, according to design specifications, and be properly maintained (e.g., pumped every 3-5 years by the homeowners.

Based on the site plan submitted to Team members, the main access road will need to cross regulated wetland soils in order to gain interior access to the subdivision site. The wetland crossing will be near the intersection of the new road and Route 32. It also appears that other portions of the main access road and individual driveways in future phases will need to cross regulated wetland soils. Wetland crossings are feasible and can be accomplished without much damage to wetlands provided they are properly designed (e.g., culverts are properly sized and installed and permeable road base fill material is used). They should be constructed at least 1.5 feet and preferably two feet above the surface elevation of the wetlands. This will allow for better drainage of the roads and decrease the frost heaving potential of the road. recommended that any road construction through wetland areas be done during the dry time of year with adequate provisions for effective It is strongly suggested that the erosion and sediment control. applicant be required to submit detailed plans for all wetland crossings. The plans would indicate specific site development details, erosion and sediment control measures, fill lines, amount of fill to be placed, the impacts of filling, watercourse channel locations and flow directions, disturbed areas, etc. Approved wetlands activity needs to be closely monitored by Town officials.

Because these soils are classified as inland wetland soils in Connecticut, they are regulated under Public Act 155. Any activity which involves modification, filling, removal of soils, etc., will require a permit and ultimate approval by the Town's Inland Wetland Commission. In reviewing a proposal, the Commission needs to determine the impact that the proposed activity will have on the wetland is serving an important hydrological or ecological function and that the impact of the proposed activity will be significant, they may deny the activity altogether or, at least, require measures that would minimize the impact.

9. WATER SUPPLY

Since public water mains are not presently available to this site, the principal source of water to homes in the proposed subdivision is the underlying crystalline bedrock. Obtaining water from any given bedrock well is dependent upon the number and size of water transmitting fractures that are encountered by the well. The metamorphic rock underlying the site responds to geologic forces by fracturing, folding and forming distinct open joints. If the underlying rock contains and continuous and interconnected fractures joints, then availability of groundwater for domestic uses should be good. Because of the way they respond to geologic forces in the earth's crust (See GEOLOGY section), it seems likely that the chance for obtaining water from fractured gneisses would be slightly better than from the schists.

The yields of a bedrock well cannot be predicted prior to drilling since the size and degree of interconnecting fractures in the rock below the site are unknown. However, experience has shown that the best yields are obtained in the top 200-300 feet of the bedrock surface. In general, well yields decrease with increased depths. Connecticut Resources Bulletin No. 11, which encompasses the site, indicates of 134 wells surveyed, 90 percent yielded 3 gallons per minute or more. Generally speaking, a yield of three gallons per minute is satisfactory for domestic purposes.

In general, private wells should be located to the high side of lots with proper separating distance from on-site sewage disposal systems and other potential sources of pollution, particularly buried fuel storage tanks. Wells must also be properly separated from water impoundments, watercourses and drains and be protected from surface runoff and erosion problems.

Proper well construction and separating distances in accordance with State Public Health Code, Connecticut Well Drilling Board and Town regulations will allow for adequate protection of the quality of bedrock aquifer.

Properly constructed drilled wells cased firmly with steel pipe into the underlying rock generally affords the greatest degree of protection against possible sources of pollution. They will also usually allow for more flexibility in actual site placement compared to shallow dug wells. All types of wells are to be constructed by persons who are state licensed for this profession. Proposed well sites should be inspected by the Town sanitarian before the issuance of a permit of approval to actually construct such well(s). The sanitarian must generally insure that provisions of the State Public Health Code, State Well Drilling Board and local ordinances have been followed.

The natural quality of groundwater should be good. However, in many locations certain rock formations alter the quality of water coming in contact with it. Two of the most common components produced are elevated levels of iron and/or manganese which may afect water quality. Experience has shown that Brimfield Schist is plagued by elevated iron/iron sulfide levels and is often accompanied by a rotten egg odor. As a result it may be necessary to install appropriate water treatment systems in order to reduce concentration to non-objectionable levels.

Groundwater in the area is classified by DEP as GA, which means that it is suitable for private drinking water supplies without treatment.

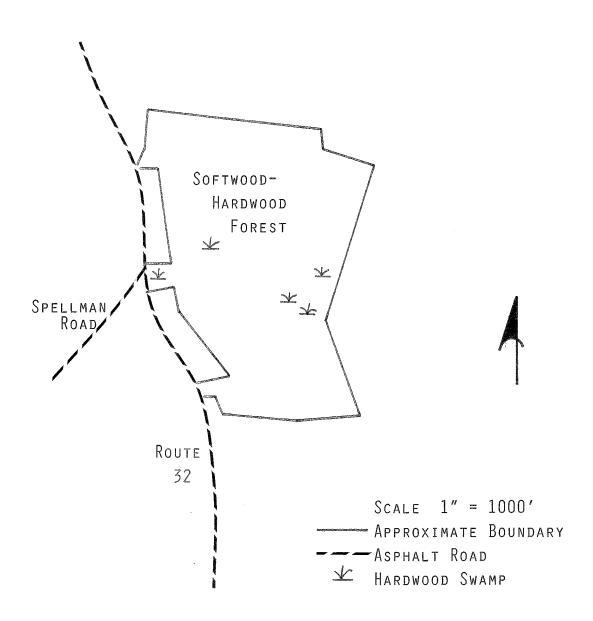
10. VEGETATION

The tract proposed for subdivision is softwood-hardwood forest type. The dominant overstory trees are a combination of scarlet oak, black oak, red oak, white oak, white pine and hemlock in the poletimber and sawtimber size classes. The intermediate overstory is composed mostly of sapling and small poletimber whie pine. There is also occasional hickory, red maple and black birch on site. The understory is predominantly lowbush blueberry, huckleberry and mountain laurel. Occasional low ground with higher soil moisture than the normal dry, sandy loam on the property, will have witch hazel, sweet fern, hay scented fern, and sweet pepperbush. Skunk cabbage and poison ivy occur in a few small areas of hardwood swamp which total less than 10 acres on the 120 acre parcel.

Aesthetic Considerations

Trees are very sensitive to the condition of the soil their root systems grow in. Development practices near trees such as excavation, filling and grading, and soil compactions from equipment disturbs the balance between soil aeration, soil moisture level and soil composition. Disturbances to soil near trees can cause a decline in tree health and vigor and result in mortality in three to five years. Cutting or

<u>VEGETATION MAP</u>



bruising roots with machinery creates breeding areas for root rot fungi which can kill a tree. Trees with cut root systems do not have proper soil holding capacity, wind firmness or water and nutrient absorption ability which results in a decline in vigor and opens the tree for insect and/or disease attack. Mechanical injury to trees from construction equipment can also be associated with mortality. On this property the white pine is subject to fomes root rot and the oaks subject to shoestring root rot from root injury. The pine and hemlock have shallow, spreading, root systems that radiate 70 to 100 feet from the base of the tree. The larger the tree the larger the root system. Construction equipment should not operate and excavation should not occur within 50-75 feet of trees along road edges and around lots cleared for building. Retaining individual trees in houselots is not recommended. Dead trees reduce the aesthetic quality of an area and may become hazardous and expensive to remove when near roads, buildings or utility lines.

Limiting Conditions and Potential Hazards

Windthrow and/or tree breakage (from ice, snow, wind) is a potential hazard on this property. Trees which grow in a forested condition rely on each other for stability and side support. Openings which allow wind to pass through, rather than over the trees will result in uprooting shallow rooted tree (white pine/hemlock) and breakage of weaker trees (tall, slender white pine suddenly opened up to wind and snow).

Overland flow will increase by disturbing highly absorptive forest soils to create houselots, roads, lawns and driveways because the sponge-like effect of the litter layer and humus will be lost. The resulting compaction prevents rain from soaking into the soil surface rapidly as it falls. This causes water to collect and run over the road surfaces or exposed soil of a gravel driveway. The runoff has the potential to build erosive power in short distances of more than 10% slope tear soil loose and cause ruts, siltation, and sedimentation. Avoid exposed soils on slopes both during and after construction.

Management Consideration

Trees that are not growing vigorously due to crowded conditions are most susceptible to further degradation from enviornmental stresses brought on by development, disease, insect infestation and adverse weather conditions. An improvement thinning which would remove undesirable trees, reduce competition for space, sunlight, nutrients and water between the high quality residual trees, will over time, allow trees to improve in health, vigor, and stability. A thinning for timber six to eight years ago did release white pine and allow it to grow, but crowding due to oak competition still exists so that a thinning to remove

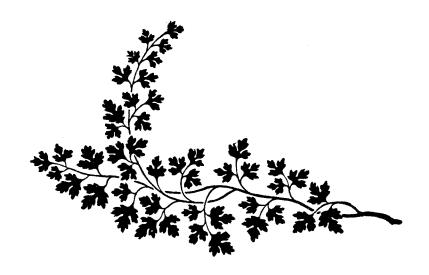
some oak sawtimber and fuelwood prior to development will allow white pine crowns to spread out and roots to stabilize the trees. The poletimber white pine has good potential for growth. Left undeveloped and managed for future timber this forest would provide pine lumber by about 2020 and for the next 50 years following. A private sector forester should be contacted to help with the implementations of the suggested thinnings. Information concerning private foresters is available from D.E.P. Forestry.

11. PLANNING COMMENTS

The Planning and Zoning Commission should consider requesting that the applicant set aside some of this 120 acres for the use of The town. If the zoning regulations presently in use do not allow the Commission to request exactions, such a section should be included as soon as possible. In the case of this subdivision this has importance because the developer will submit sections of this development a few lots at a time. The overall plan for the 120 acres should be proposed to the Commission in order that they can determine if there is any land they want for the Town.

The overall plan should, also, show additional egress and access to the property. An additional access to Route 32 should be provided to ensure safe routes for emergency vehicles. Another access should be planned from the property to at least one of the adjoining properties to ensure proper traffic patterns in the future. This connecting road should be built to the highest road standards that the Town has and as a trade-off with the developer. Some other non-connecting roads could be built to lesser standards.

The present plan suggest that all lots will be as close to the minimum required as possible. In some locations, for aesthetic reasons, it might be in the developer's interest and the Town's interest to have some lots larger. Advantages such as siting on the lot or panoramic views and larger than minimum size houses might make the subidivision more desirable.



About The Team

The Eastern Connecticut Environmental Review Team (ERT) is a group of professionals in environmental fields drawn together from a variety of federal, state and regional agencies. Specialists on the Team include geologists, biologists, foresters, soil specialsits, engineers and planners. The ERT operates with state funding under the supervision of the Eastern Connecticut Resource Conservation and Development (RC&D) Area --- an 86 town region.

The services of the Team are available as a public service at \underline{no} \underline{cost} to Connecticut towns.

PURPOSE OF THE TEAM

The Environmental Review Team is available to help towns and developers in the review of sites proposed for major land use activities. To date, the ERT has been involved in reviewing a wide range of projects including subdivisions, landfills, commercial and industrial developments, sand and gravel excavations, elderly housing, recreation/open space projects, watershed studies and resource inventories.

Reviews are conducted in the interest of providing information and analysis that will assist towns and developers in environmentally sound decision-making. This is done through identifying the natural resource base of the project site and highlighting opportunities and limitations for the proposed land use.

REQUESTING A REVIEW

Environmental reviews may be requested by the chief elected official of a municipality or the chairman of town commissions such as planning and zoning, conservation, inland wetlands, parks and recreation or economic development. Requests should be directed to the chairman of your local Soil and Water Conservation District and the ERT Coordinator. A request form should be completely filled out and should include the required materials. When this request is approved by the local Soil and Water Conservation District and the Eastern Connecticut RC&D Executive Council, the Team will undertake the review on a priority basis.

For additional information and request forms regarding the Environmental Review Team please contact the ERT Coordinator: 203-345-3977, Eastern Connecticut RC&D Area, P.O. Box 70, Haddam, Connecticut 06438.