

**PROPOSED DPW FACILITY
JOHN HORTON BOULEVARD**

**RESPONSES TO PUBLIC COMMENTS RECEIVED AT THE
PUBLIC BUILDING COMMITTEE MEETING ON SEPTEMBER 19, 2022**

- C. The site has a shallow water table and is located on a drainage divide. Concern was noted that Best Management Practices may not mitigate impacts with respect to salt storage and possible releases to the groundwater.

R. This site is characterized by high groundwater. The previously issued Environmental Review Team Report (ERTR) on this site notes that "the upland soils do have a high water table, but that the soils can support both roads and structures noting that the roads will require underdrains and structures will require foundation drains".

With respect to potential contamination from salt, the best management practices to be incorporated both during construction and post construction are for the purposes of avoiding such a release. Storage and handling of salt will be within enclosed structures and performed on impervious surfaces. Stormwater management systems will be designed to prevent pollution by avoiding stormwater coming in contact with other materials and providing impervious surfaces in these areas. Operational practices will include a spill prevention plan to avoid any unanticipated release.

Correspondence received from the Connecticut Department of Public Health (CDPH) in consultation with the Connecticut Department of Energy and Environmental Protection (CTDEEP) stated that "given that the construction, maintenance and operations of the facility are conducted with best management practices, any chance of groundwater contamination associated with the project would not be of significant concern to the Departments."

In addition, in searching through their records, the State has indicated they have not received any reports of ground water or well water contamination from Salt Storage Facilities.

- C. How have historic boundary markers changed since 2016 and 2022?

R. There have been no substantive changes in the conceptual design plan from 2016 to the current plan. We are not aware of any changes in the historic boundary markers during that time.

- C. Additional concerns about potential for salt contamination were noted and a letter from William Warzecha was introduced.

R. Mr. Warzecha is a hydrogeologist previously employed by CTDEEP. His letter discusses concerns about potential impacts to residential properties from road salt emanating from the proposed site development. We are in no way minimizing the concerns raised by Mr. Warzecha. However, some clarifications and responses are warranted.

C = Comments

R = Responses

Comments are summarized to reflect specific concerns presented. Repetitive comments are not included.

Mr. Warzecha discusses impacts on properties downgradient of the project. As a point of clarification, there are only two developed residential lots located topographically downgradient of the project. These are 22 Kinney Road and 78 Kinney Road. Both are on the south side of Kinney Road and approximately 1,400 feet or over ¼ mile from proposed facility. Based on surficial topography of this area, surface runoff from the project will be directed to the existing wetlands on the property to the east and west and ultimately through culverts under Kinney Road. Surface runoff will not be directed towards these properties.

Mr. Warzecha suggests locating the project at a location where groundwater has already been impaired. There is no such suitable site within the Town. The reason for the proposed relocation of this facility is that the existing site cannot physically accommodate the Department's current and future needs.

Mr. Warzecha notes that CTDEEP ranks public works garages as a land use that poses a significant risk to groundwater quality and to domestic wells topographically down gradient of the site. We believe that this reference is applicable to older developed sites that were constructed and operated prior to the current standards; and that this assertion is not applicable to facilities that need to meet current permit requirements and need to incorporate current best management practices. As noted above, correspondence received from the Department of Health in consultation with CTDEEP concerning this project included the following: "given that the construction, maintenance and operations of the facility are conducted with best management practices, any chance of groundwater contamination associated with the project would not be of significant concern to the Departments."

The recommendations that Mr. Warzecha suggested regarding salt storage and handling and truck washing being performed under covered enclosures is part of the project plan and will be incorporated into the design documents. This aspect of the plan has been discussed and presented at public meetings concerning the project.

The Town agrees that baseline testing of residential wells downgradient of the project in the area should be done prior to the start of construction. There is no plan for consideration of extending public water to residences in the area since that would be based on an assumption that wells will be contaminated which is not the case.

C. Why were only two sections of the Plan of Conservation and Development (POCD) discussed in the presentation? The proposal is in conflict with other sections of the POCD. The June 2000 ERT Report sites fractured bedrock and notes the corollary between increased permeability and increased dispersal of contaminants. The questioner refutes the contention that no other suggestions for site were given.

R. The presentation referenced the two sections of the POCD that are directly relevant to this project. Those sections are Municipal Facilities and the Zoning of the Parcel. More information would need to be provided by the questioner as to how they see that the project conflicts with other portions of the POCD in order to provide a response to that comment.

The concern with respect to bedrock geology assumes contaminants will be released into the groundwater which is not the case.

We are not aware of any alternate specific sites having been suggested, with the exception of the existing site on Old Colchester Road, which has been thoroughly studied and found not viable for reconstruction and expansion.

- C. How far will the driveway be from Church Street? What would happen to the existing salt sheds on Old Colchester Road and Salt Box Road? Is Connecticut Water Company confident they can supply amount of water needed?

R. The Driveway entrance is about 1,250 feet or about a ¼ of mile from Church Street. There is an existing gravel entrance pad that can be seen at this location.

Existing salt sheds on Old Colchester Road and Salt Box Road would be eliminated. One central site to service the town will replace these.

A review by the Connecticut Water Company as to water needs for the site and their ability to provide it is currently being conducted. However, it is known that the proposed use of the site has relatively low water demands.

- C. What will the impact on traffic be as there will understandably be many vehicles coming and going from the public works facility to carry out their duties?

R. Traffic impacts will be minimal. Normal hours of operation are 7:00 -3:30 and traffic during that time includes employees coming to and from work and crews going out for their assignments during the workday. An estimate of current activities indicates about 50 vehicle trips per day, which equals about 6 vehicles per hour over that period. It is estimated that 80-90% of the daily traffic will use John Horton Boulevard via Main Street for access and egress to the property. With respect to trucks passing Hebron Elementary School (HES), during a typical day the number will be diminished since the new facility will be relocated further to the north as compared to the existing facility.

In regards to snow removal this can be analyzed by current and future plow truck routes. There are currently 13 plow routes; nine of these typically pass (HES) to reach points north, east, and west. In the future, the only truck that would need to pass HES would be the truck that plows that facility. However, assuming all truck routes leave and return to the facility by the north end of John Horton Boulevard, which is the plan, perhaps two additional routes would pass HES. This would be significantly less than the current condition.

- C. How will the project impact wetlands?

R. Direct impact to wetlands will be limited to the two road crossings for the John Horton Boulevard extension. All other land disturbances are outside of wetland and conservation areas. Erosion controls during construction and best management practices after construction will mitigate impacts to wetlands. Stormwater runoff from developed areas will be treated in accordance with the CTDEEP Stormwater Quality Manual.

- C. Has there been any studies on impact to endangered species?

R. The area has been reviewed with respect to the Natural Diversity Database Areas mapping and there are no State and Federal Listed Species within the project area.

- C. The facility should be kept in its current location in an industrial zone. Kinney Road is a residential neighborhood. Concerns about truck traffic, diesel and gasoline storage, truck washing and a stormwater pond were noted.

R. The current facility is located in a residential zone not an industrial zone. The proposed site on the Horton Parcel is in a commercial (mixed-use) zone. Based on the proposed new building location the closest existing residential house is about 1,300 feet away or about ¼ of mile. Whereas the current building on Old Colchester Road is about 160 feet from the closest residence and there are four residences within 500 feet.

Truck traffic from the proposed facility will, in the majority of the cases, be using John Horton Boulevard heading north to access Main Street. Because of the minimal changes in traffic using Kinney Road no improvements to Kinney Road are needed or proposed.

Fuel storage must be above ground in environmentally compliant tanks with secondary containment. An environmentally compliant truck wash bay will be included in the project and will include drains that will discharge to an oil/water separator and then ultimately into the sanitary sewer system. The stormwater ponds are for the purpose of capturing and treating stormwater runoff and are employed to prevent impacts from them.

- C. Who from the Town will monitor best management practices?

R. There will be one plan that will apply to activities that occur during the Construction Phase and another plan that will apply to the Occupancy of the facility.

The CTDEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities requires that a Stormwater Pollution Prevention Plan be prepared for the project. During the Construction Phase the General Contractor, Construction Manager or the Sitework Trade Contractor are obligated to perform, at a minimum, weekly inspections. These inspections are logged on a form that will be composed by the Civil Engineer. They must be maintained in a Log Notebook readily available within the construction trailer or office. In the case of a pending inclement weather event and upon the cessation of an inclement weather event, these inspections must be performed with the forms being completed. In all cases, any deficiencies that are noted must be addressed immediately. The Civil Engineer is obligated to conduct regular and routine on-site inspections to be sure that every aspect of the Stormwater Permit is being complied with.

The CTDEEP General Permit for the Discharge of Stormwater Associated with Industrial Activity requires that an operation and maintenance plan be prepared with requirements for best management practices after construction. During the Occupancy Phase, monthly inspections are done by the Department. Semi-annual audits are done by an outside engineer. Records must be maintained on site and the site is subject to inspections/audits by CTDEEP at any time.

- C. Statement that the facility on Old Colchester Road is a feasible alternative, that this is Phase I of a larger project, that no other Town has a DPW facility near their Town Center and that the project should be brought to referendum now.

R. As previously discuss and presented, the existing site at Old Colchester Road is not adequate for reconstruction or expansion, even with additional adjacent land added.

The master plan is a long-term conceptual proposal. The current project does not require, nor does it anticipate that other buildings or Town facilities be relocated to this site. It does, however present a concept of how this might be accomplished sometime in the distant future. The overall master plan is subject to review and reconsideration based on the Town's needs and further environmental studies of the land. In addition, assertions being made that the Town is considering in the near future proposing to construct a new Town Office Building and a new Public Safety Building are not correct or accurate. Likewise, the assessment that the costs for the overall plan would be in the range of \$50-million dollars are also not accurate, since the Town has no plans to propose the construction of these other buildings.

The statement was made that no other Town has its Public Works facilities near their Town center, however no data or findings were provided to support this. A recent survey through the University of Connecticut's "listserv", regarding location of public works facilities in the center of towns found that there are many facilities located there. As an example, this is one of the responses that was received: "The Town of Bethlehem's public works department and garage are directly in the center of town. The town hall, library, fire department, and public works garage are all next to each other. Public works has been in the towns center since the 1960's; space and storage tend to be difficult as we are limited to open available land. Being in the center has its advantages during storm events (i.e., creating efficient snow plowing routes and having a central location for dispatching and staging during weather events)." Some of the many Towns that have their Public Works Facilities in or near their centers are South Windsor, Woodbridge and Thompson.

We understand the desire to bring the project to referendum as soon as possible, however, it is imperative that the project design be developed to a point that it can provide all of the information necessary to fully address all concerns and questions. As can be seen by the comments presented at this meeting, there are clearly still questions that need to be fully addressed. Additionally, a detailed project estimate is needed in order to accurately establish a required funding amount to be sought at a referendum. The project design will provide confidence in the amount that is required.

C. The areas considered seem limited due to Hebron's Zoning Laws. Could another site be found and rezoned? Why is there a necessity for public sewer and water?

R. Hebron's zoning laws are established to be consistent with the Town's Plan of Conservation and Development. Any other viable location for this project would be in an area currently zoned residential and intended for that use. While governmental uses are permitted in residential zones, extensive studies have been conducted and an alternative suitable location was not found.

Public water and sewer are critically important to the project. The septic system and well at the existing Old Colchester Road site have been problematic. The 2000 ERT Report noted that "Clearly a central community water supply system in the Town Center is desirable over further proliferations of individual supplies." Sanitary sewers are desired for handling of vehicle wash water which would otherwise need to be stored in tanks, pumped, and hauled off site. Also, public sewers would minimize localized environmental concerns within the project area.

C. What is the cost of the facility? When permit applications are completed can they be posted on the website? Has there been a traffic study? What about cut through traffic from Main Street? Should

previous analyses be redone to reflect that population growth has slowed? Has there been a geotechnical study? If the Town Hall and Firehouse move to this site what will happen to those properties?

R. A detailed construction cost estimate has not yet been prepared but will be as part of one of the many pre-referendum tasks. A conceptual estimate developed several years ago when the project was first conceptualized put the project cost in the range of \$11-\$12 million. However, because of price escalation and current inflated construction costs, that cost is now more likely in the range of \$16-20 million.

Yes, all permit applications and actions will be posted on the Town website.

A traffic study has not been prepared for this project. The Planning & Zoning Commission may request a traffic study as part of their Special Permit/Site Plan review but given the minimal levels of traffic the project will generate, a traffic study is not likely needed.

The Needs Analysis that was conducted for the public works facility is based on the amount of Town owned infrastructure that is needed to be maintained. It is not population dependent and therefore updating previous studies would not yield any substantive changes. Although there has been a slight decline in the Towns' population the amounts of roads and related infrastructure that the DPW has to maintain has not decreased. In addition, as all of the existing infrastructure continues to age, it will require more attention by the DPW and not less.

There have not yet been site specific geotechnical studies. These are typically performed as needed during further design phases.

Relocating the Town Hall and Firehouse to this property are considered in the far distant long range master plan. These actions would require additional studies and their own detailed site plan review. If and when that were to happen, the existing sites would be available for commercial development. However, the future use of the existing sites would be dictated by the Town's Zoning regulations and subject to review and approval by the Planning and Zoning Commission.

C. Since the town has issues with the current site, how can we be sure that the future site will be properly maintained? Why do we need a green for concerts?

R. Most of the deficiencies at the existing site are caused by a lack of usable space, both inside the buildings and on the site. This would be resolved by having a newly constructed environmentally compliant facility with adequate space. Additionally, while necessary repairs to the existing facility will be undertaken, it is recognized that they are only providing temporary and not long-term solutions.

It was thought that this large open area would be a desirable asset because the Town currently lacks a Town Green. The original Town Green was lost when the Department of Transportation redesigned the traffic flow within the center of Town.