



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF ENVIRONMENTAL REVIEW  
79 ELM STREET, HARTFORD, CT 06106  
Tel. 860/424-4109 Fax - 424-4053



December 17, 1996

Mr. Joe Hand  
U.S. Army Corps of Engineers  
Mobile District  
P. O. Box 2288  
Mobile, Alabama 36628-0001

RE: Notice of Scoping - Stratford Army Engine Plant

Dear Mr. Hand:

I am responding on behalf of the Department to the subject notice and would like to thank you for soliciting our comments at this early stage in the preparation of a NEPA document. The notice of this intended action by the Department of the Army has been widely circulated throughout the Department, which includes resource management and environmental quality disciplines, and these comments are a coordinated response.

The preparation of a NEPA document that adheres to the topics presented in the Base Realignment and Closure Manual for Compliance With the National Environmental Policy Act and thoroughly addresses the baseline conditions and resulting impacts of the contemplated action(s) should result in a thorough analysis. The issues that the Department will focus on during our review of the DEIS should generally be satisfied by this analysis, with one exception. The referenced manual is silent on how proposed action(s) comply with federal coastal consistency requirements, as prescribed by 15 CFR 930.37. The review of this coastal consistency determination by the State of Connecticut is the responsibility of the Department's Office of Long Island Sound Programs. I have enclosed a memorandum from Margaret Welch that further describes your coastal consistency responsibilities and the primary issues that must be addressed in this process.

The Natural Diversity Data Base (NDDDB) maps and files for the subject property have been reviewed for the presence of Federally listed endangered or threatened species or species listed by the State, pursuant to section 26-306 of the Connecticut General Statutes, as endangered, threatened or special concern. This review has identified that there are State threatened Atlantic sturgeon (*Acipenser oxyrinchus*) in the vicinity of subject property. Please contact Linda Gunn or Peter Aarrestad of the Department's Fisheries Division at 860/434-6043 (Marine Headquarters, Old Lyme) for further

information on the sturgeon.

The NDDDB includes all information regarding critical biological resources available to Department. This information is a compilation of data collected over the years by the Department's Natural Resources Center and other cooperating units of the Department, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site specific field investigations. Consultation with the NDDDB should not be substituted for on-site surveys, as required for environmental assessments. Current research projects and new contributors continue to identify additional species information, locations of habitats of concern, as well as, enhancing existing data. New information is incorporated into the NDDDB as it becomes available.

The Department's PCB files have been reviewed for the subject property. Our records indicate that a \$586,425 Consent Agreement and Order was issued to AVCO, Textron Lycoming by EPA in 1993. One of the subjects of this action was non-compliance with regulations regarding 19 PCB transformers present at the site. The status of any actions taken to comply with this Order and the continuing presence of such items should be reported. Also, any PCB contamination that may have occurred should be appropriately evaluated.

To facilitate the Department's review of subsequent documents related to this project, please forward six copies of these materials to this Office, and we will provide distribution to other disciplines within the agency. If I can be of any assistance regarding these comments as you proceed with the preparation of the NEPA document, please give me a call at the above number. Thank you.

Sincerely,



Brian J. Emerick  
Supervising Environmental Analyst

Encls (3)

cc: K. Feathers, DEP/PERD  
L. Saliby, DEP/PCB  
D. McKay, DEP/NRC  
M. Welch, DEP/OLISP

M. Sullivan, DEP/OCE  
L. Gunn, DEP/FD  
P. Aarrestad, DEP/FD  
D. Leff, DEP/OAC