

Groton Open Space Association, Inc.

P.O. Box 9187, Groton, CT 06340-9187

www.GOSAonline.org



Colin Goegel, Connecticut Airports Authority,

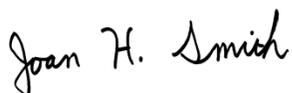
334 Ella Grasso Turnpike, Suite 160, Windsor Locks, CT 06096

Draft Environmental Assessment Report for Groton New London Airport Tree Obstruction Removal
January 24, 2017

Groton Open Space Association (GOSA) recommends that the Connecticut Airports Authority conduct a full Environmental Impact Statement for the proposed Bluff Point project for the following reasons:

- 1) Special Act NO. 76-27 AN ACT CONCERNING THE USE OF LAND AT BLUFF POINT COASTAL RESERVE states that: “no improvement shall be undertaken which does not contribute to the preservation of the natural, scenic, historical or ecological values of the reserve...Living and nonliving resources contained within the reserve shall not be disturbed or removed for other than scientific or management purposes and only upon the approval of the commissioner of the department of environmental protection.” CT DEEP, as the owner of the property, has a mandate to ensure actions are consistent with the act.
- 2) FAA regulations allow for a 20:1 slope on three of the runway approaches. Moving the landing point further away from Bluff Point on runway # 33 would provide for a higher tree clearance and ensure a safe 20:1 approach without having to cut trees on the Bluff Point peninsula. The runway would be essentially shorter for landings, but the full length could still be used for take-offs. This alternative needs further exploration by the CAA.
- 3) The proposed draft plan offers only vague detail about the potential impact from logging practices on flora and fauna and offers nothing about future reforestation efforts. Sensitive ecosystems could be at risk from trucks, heavy logging equipment, clear cutting, erosion, sedimentation and improper debris disposal. There could be impacts to the endangered piping plover if trucks were to traverse the beach habitat to access Bushy Point. A previous logging project on Bluff Point caused harm to wildlife by removing beneficial shrubs and by dumping a three-to-four foot thick layer of wood chips on the forest floor.
- 4) Bluff Point is unique as the last large coastal forest peninsula having stands of mature trees in Connecticut. A **complete environmental impact statement is needed to** identify the exact location of specific rare and endangered plants and animals that could be at risk from the proposed forestry activities. Vulnerable areas also include sand beaches (with endangered piping plover habitat), brackish marshes, freshwater wetlands, coastal wetlands, coastal grasslands, coastal woodlands and special coastal shrub lands resulting from wind and salt spray impacts.

Groton Open Space Association (GOSA) GOSA is a 501©3 land trust and environmental advocacy organization, formed in 1967 to save Haley Farm State Park and Bluff Point State Park and Coastal Reserve. We have an established history in protecting this resource.



Joan Smith, GOSA President