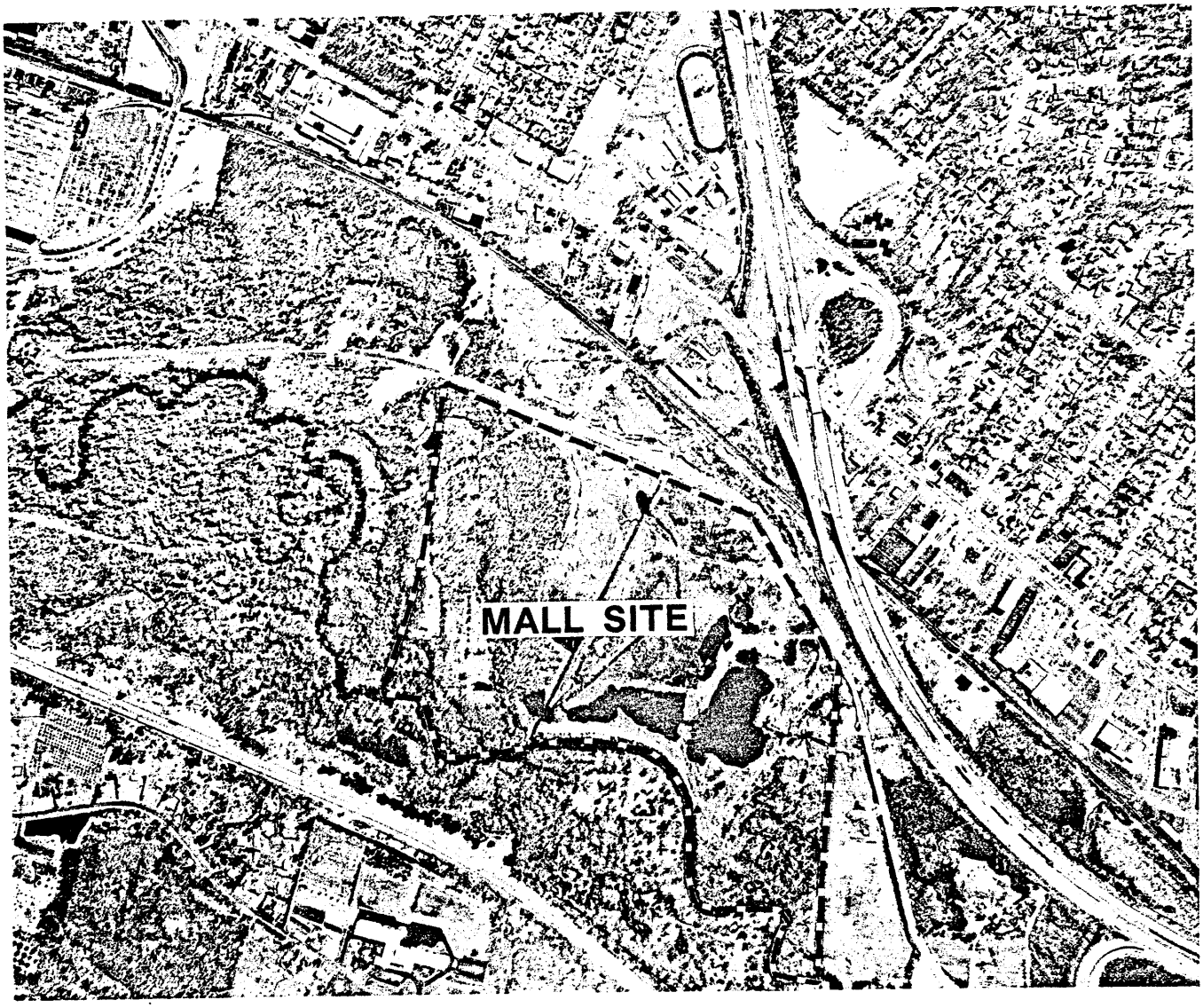
FINAL ENVIRONMENTAL IMPACT STATEMENT

COMMENT LETTERS

Volume 2 Part 2

NORTH HAVEN MALL

NORTH HAVEN, CONNECTICUT



JUNE 1983

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US Army Corps of Engineers
New England Division

ORIGINAL COMMENTS

ON

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR THE

NORTH HAVEN MALL,

NORTH HAVEN, CONNECTICUT

VOLUME 2 ... PART 2

(345-585)

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March 21, 1982

Robert Adler, Division Engineer
New England Division, U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Re: Proposed North Haven, CT Shopping Mall (NEDPL-IP)
Comments on Draft EIS and 404 Review

Dear Mr. Adler:

Enclosed is a copy of a letter I wrote which recently appeared in both the Advisor and the North Haven Post. I request that the Army Corps include in its final EIS responses to the four criticisms of the Draft EIS raised in this letter. Specifically:

1. Please re-assess your assumption of an unmet public need for retail services in view of declining population trends shown in the 1980 Census figures and declines in consumer spending ability pointed to by countless national statistics.

2. Please assess the impact on existing area merchants of declines in sales of 8.5 to 13.2 percent. What percentage of local businesses might be forced to close or to reduce the size of their facilities?

3. Please thoroughly assess the impacts and benefits of alternative uses for the mall site including office and light industry and compare these to the impacts and benefits of a mall. Please re-assess your assumption in the Draft EIS that this site is not suitable for industrial/office use in view of the two new industrial parks being built nearby on similar sites in North Haven.

4. Please note in the final EIS that documents refuting the developer's studies were not included in the Draft EIS and evaluate the adequacy of holding a public comment period on the draft without making this information available to the public. Please include references to the critiques of the developer's studies and your responses to these critiques in the final EIS.

I reiterate my opposition to the proposed North Haven mall. I wish to remind the Army Corps that it is the only body with a mandate to examine the broad and long-term sociological, environmental, ecological, and economic impacts of this proposal. I urge the Army Corps to shoulder this responsibility and to deny the 404 permit to the developer.

Thank you for your consideration in this matter.

Sincerely,

Sandra Aivano

Sandra Aivano
145 Bayard Avenue
North Haven, CT 06518

Statement Presented To the Army Corps of Engineers
Public Hearing, March 16, 1982

Draft Environmental Impact Statement
North Haven Mall
North Haven, CT
March 16, 1982

Accompanying this statement, the citizens of Stop the Mall/CCAG present a copy of the Draft EIS in which we have underlined the statements which are biased in favor of the developer. We assume that your directives in writing the EIS require you to be objective, to accept information from many sources, to evaluate all of this information, and finally to give as impartial a presentation as possible. We feel this has not been done in the Draft EIS.

Instances of bias can be found from the very first page of the document. The Purpose And Need For The Proposal, Section I.1, consists of four paragraphs explaining the purpose of the mall in terms of its supposed public benefits. Only in the last sentence is it mentioned that 'In addition to the public purpose of the proposal, it is recognized that the applicant's purpose for the proposal is to provide goods and services for a profit within the private business sector.' As we feel that profit is the primary purpose of the proposal, it should be presented first and in more detail.

Instances of bias in favor of the developer are found throughout the Draft EIS. This biased perspective is most evident in the concluding statement in the Abstract: 'No significant impacts are expected on upland areas, existing flood conditions, air quality, noise, utilities, community services, water quality, or societal institutions.' We infer from this statement that significant impacts do exist in the other areas covered by the Draft EIS, namely ground water, wetlands, surface water resources, transportation, economics and land use, visual quality, historical and archeological resources, and energy consumption. The fact that you choose to delineate the areas where no significant impacts were found while omitting an equal number of areas where significant impacts were discovered reflects the biased perspective of the report.

We feel that the clearest presentation of our findings of your bias could be made directly in the Draft EIS itself, in the margin next to the biased statements. There you could relate the comments to the text. We request the Army Corps to respond to every marginal comment we have made in this Draft EIS, and to include your responses and the changes they have elicited in your final Environmental Impact Statement.

Presented By:
Sandra Aivano
145 Bayard Avenue
North Haven, CT 06518

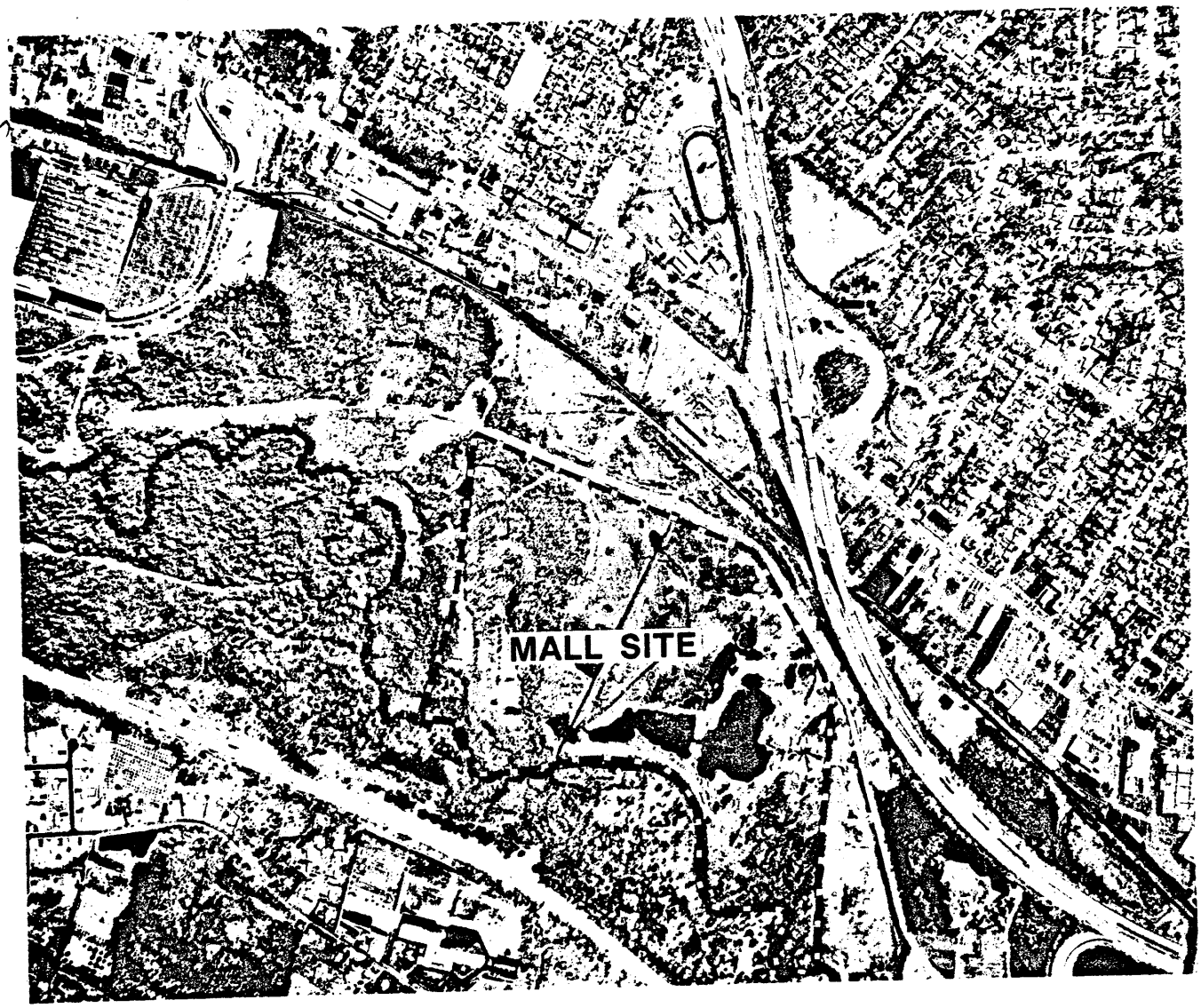
3/4

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Section 404 (b)(1) Review

NORTH HAVEN MALL

NORTH HAVEN, CONNECTICUT



February 1982

US Army Corps
of Engineers
New England Division

DRAFT ENVIRONMENTAL IMPACT STATEMENT
NORTH HAVEN MALL
NORTH HAVEN, CONNECTICUT

Abstract: Mall Properties, Inc., has applied to the Corps of Engineers for a permit to place fill in wetlands and water courses in conjunction with the development of a major regional shopping mall in North Haven, Connecticut. The Corps of Engineers determined that an Environmental Impact Statement was necessary and developed a scope for a draft impact statement incorporating public participation. The Corps requested information from Mall Properties, Inc., and reports were subsequently developed to support preparation of an impact statement. Additional information and comments were offered by the U.S. Department of Housing and Urban Development, U.S. Fish and Wildlife Service, city of New Haven, the Stop the Mall Organization, and other public and private interests.

correct name is Stop the Mall / Ct. Citizens' Action Group

The proposed mall is to be a four "anchor-store" facility with approximately 100 specialty shops and parking for 5600 cars. Evaluations of the retail market have indicated that additional retail shopping is needed in the region and that the mall would be a strong attraction. Conflicting projections indicate that the mall would have a varying degree of impact on other major retail centers in the area; projections for maximum loss to existing retail sales vary between approximately 8.3 percent and 13.2 percent.

Debatable Projections are now questioned

Development of the mall would cause an increase in traffic volumes on local streets. Highways and parkways would be the primary access roads, and their levels of service would not be seriously affected. Some neighborhood residential roads serving as access routes would experience a 15-25 percent increase in traffic (Bishop Street more-so), perhaps causing a drop in one level of service on a few streets. Generally, these roads are State-designated routes and their levels of service would be "C" (signifying generally stable flow with satisfactory operating speeds) or better. Neighborhoods receiving the increased traffic levels may experience some inconvenience, annoyance, and feeling of increased activity. With proposed modifications, traffic should be manageable, with some congestion expected during peak hours, inclement weather and holidays. Development would cause a loss of 25 acres of man-created and natural wetlands, but would not destroy significantly productive habitat. No significant impacts are expected on upland areas, existing flood conditions, air quality, noise, utilities, community services, water quality, or societal institutions.

Manageable for whom? Homeowners?

Why not mention where the significant impacts are

If you would like further information on this statement, please contact:

Mr. Robert E. Adler
U.S. Army Corps of Engineers, NED
424 Trapelo Road
Waltham, Massachusetts 02254
Commercial Telephone: 617-894-2400 (231)
FTS Telephone: 839-7231

ground water
surface water resource
transportation
economics
land use
visual quality
historical
archeological
energy

SUMMARY

Background

Mall Properties, Inc., the applicant, has requested a permit from the Corps of Engineers under Section 10 of the River and Harbor Act of 1899 and Section 404 of the Clean Water Act to place fill material in wetlands and backwater areas adjacent to the Quinnipiac River in North Haven, Connecticut. This Draft Environmental Impact Statement (DEIS) has been developed to review the environmental impacts of the Corps permit action. As such, the DEIS reviews impacts associated with the applicant's proposal, the alternatives for accomplishing the objectives of the proposal, and the "no-action" alternative which would be the situation if the request for a permit were denied.

Purpose of and Need for the Proposal

The applicant's purpose is to promote private sector business engaged in providing goods or services for profit. The public purpose of the proposal is to satisfy a need in the Metropolitan New Haven area for retail shopping that offers a concentration, depth and variety of shoppers goods and merchandise not presently available. The applicant's proposal seeks to serve this retailing need by developing the North Haven Mall, which seeks to provide a combination of four "anchor" department stores and a diversity of specialty stores.

Alternatives

(a) Alternatives Assessment

Several scenarios for accomplishing the objectives of the proposal are considered in this DEIS and include alternative single-site locations (including the expansion of an existing retail center) for a comparable retail center, and the provision of comparable retail services through a combination of two or more locations (again, considering expansion). Also, included was a review of alternative configurations for the proposed mall at the site, alternative uses of the site, and the "no-action" alternative.

The array of reasonable plans to satisfy the retail needs was analyzed and reduced to the following alternatives:

-- the proposed North Haven Mall development, and

-- a reduced scale of the proposed North Haven Mall development; this, however, is not a foreseeable option and has no active developer.

The "no-action" alternative, where a permit from the Corps of Engineers would be denied, would not accomplish the objectives of the

proposal as there are no foreseeable alternatives to providing retail services necessary to satisfy the purpose and needs of the proposal.

(b) Mall Properties, Inc., Proposed Project

Major Factors Considered in Applicant's Planning Process

The major factors considered by the applicant in the planning process included the following: need for retail and service facilities and market feasibility; range, diversity, and concentration of proposed retail services; location with respect to market; transportation access; compatibility with adjacent land uses; economic and environmental feasibility; acceptability to elected officials and residents of the town of North Haven; availability of utility services; and land use constraints such as zoning and proximity to the Quinnipiac River.

NHCC requested in writing for 100' greenbelt

North Haven Mall Proposal

The applicant seeks to develop a regional shopping center in south central Connecticut to be known as the North Haven Mall. The mall's 1.12 million square feet of retail space would be occupied by four major department stores (J.C. Penney, Macy's, G. Fox, and Sears Roebuck) and a combination of small specialty shops, restaurants, and entertainment, service, and recreational facilities. The concentration of retail activities would provide a variety of shopping goods and services, including a wide selection of department store-type merchandise, apparel, and home furnishings.

tell exact committment from store

The proposed North Haven Mall site is located in the town of North Haven, with access to Interstate 91, the Wilbur Cross Parkway, and a secondary highway network. The site is centrally located to serve its principal market area, which includes the municipalities of North Haven, New Haven, Wallingford, Hamden, North Branford, East Haven, Bethany, Woodbridge, Orange, West Haven, Branford, Guilford, Madison, Durham, Middlefield, Meriden, and Cheshire.

The proposed mall site of 117.5 acres lies along the Quinnipiac River in the north central portion of North Haven in a section of the town's commercial/industrial corridor. Although vacant, the site is extensively disturbed from quarrying and mining activities which have stripped and lowered large segments, creating ponds, a drainage ditch and some wetlands.

there was definite proof of long term wetlands core digs described CFE

The proposed retail use of the site is compatible with surrounding land uses. The corridor for which the mall site is proposed is situated adjacent to and served by highway and railroad, and is separated and buffered from residential neighborhoods. It was set aside by the town for commercial and industrial use in the 1960s. Consistent with these planned uses, current zoning allows the development of a regional shopping center at the site. In order to facilitate development of the corridor, the town constructed the Valley Service Road in 1971 as an access road to the site.

In 1974, the town entered into an agreement with the applicant detailing commitments with respect to public service improvements. In 1978 the town's Inland Wetlands Commission granted a permit for the construction of the mall, requiring that no construction extend beyond the Quinnipiac River encroachment line.

no mention of smaller size o project in 1973

All stores and services would be housed in an enclosed mall situated in the approximate center of the site. In addition to the mall, a separate theater building is proposed for the northeast corner of the site. These buildings and parking for 5,600 cars would occupy about 78 acres of the property. No outdoor recreational facilities are planned. A 16.5-acre, fenced-in detention pond is proposed at the southern end of the site. A buffer zone of woods, which is in compliance with the requirements set by the Inland Wetlands Commission, would remain along the Quinnipiac River in widths varying from 75 to 300 feet. No construction is proposed to extend beyond the Quinnipiac River's encroachment line.

Several modifications to the existing transportation conditions have been proposed to provide safe and convenient access to the proposed mall. Access would also be designed for potential use by mass transit buses. In a plan separate from the modifications that have been proposed for the mall, the Connecticut Department of Transportation has proposed widening Bishop Street to upgrade its condition to meet existing demands. This proposal has been the subject of a separate environmental review by the Connecticut DOT and the Federal Highway Administration.

(c) Reduced Scale of Mall Facility

A three anchor-store facility was considered to have the potential of serving a major segment of the retail needs of the region for which the four-store proposal was designed. Construction of a smaller mall would cause slight incremental reductions in the impacts to wetlands, requirements for flood plain fill, and traffic impacts. The majority of effects would still be present.

smaller p. was approv It simply depends how much smaller

A three-store facility would decrease Mall Properties, Inc., development costs by 20 to 23 percent, approximately $6.9 million dollars, for reduced parking requirements and building construction. This would represent a one-time savings to the applicant. A result of a smaller mall would be the continuous long-term reduction in revenues that a four-store facility would generate for the developer. A 25 percent (approximately $21 million annually), or greater, decrease in revenues might occur as a result of reduced sales area and possible lower productivity. The economic/retail effects of a four-store mall would be reduced by $4.6 million in transfer sales within the region and $16.7 million on sales leaving the region or that could be attracted into the region.

Are they expecting a $4 million p year revenu

(d) No Action

Why is ACE trying to satisfy that need?

This alternative would occur as a result of a Corps of Engineers decision to deny a permit for placing fill in waters and wetlands at the proposed mall site. The no-action alternative would not satisfy the purpose and need for which this proposal was made. There are at present no other practicable locations for the applicant to develop a mall, and there are no foreseeable retail proposals that could accommodate the needs in the retail area of the proposed North Haven Mall.

Under the no-action alternative it would be difficult for the town to further its own development objectives by attracting development at this site due to high development costs and, potentially, due to the discouraging atmosphere of regulatory review processes.

ACE cannot assume this

Without development, the southern portion of the site would likely retain its existing use for a sand and gravel mining operation. This use would continue to alter the existing ecological community, but would allow another to replace it. The northern section would remain in town hands in its existing open condition, having been previously altered. The entire site could eventually be altered, but would still have a "natural" resource condition. As a result, this alternative is the environmentally preferable alternative with respect to impacts on natural resources.

Environmental Impacts

(a) Public Benefits of the Applicant's Proposal

not to be assumed there is a need

Retail analysis demonstrates that the proposed North Haven Mall would satisfy the currently unmet public need for retailing services. It indicates that the proposal would reverse the existing substantial leakage of shopping goods expenditures from the New Haven-West Haven Standard Metropolitan Statistical Area (SMSA), to nonmetropolitan retail facilities. These leakages are projected to continue for at least the next decade. It is also projected that the proposed mall would enhance sales inflows to the metropolitan area because of its size and its location near growing suburban communities.

unproven— Regional Stat show decline in population.

Provision of the retail facilities associated with the proposed mall is predicted to enhance the level of merchant competition in the metropolitan New Haven area, which in turn should improve retail services for shoppers and tend to lower prices. The proposed mall would also reduce the number of miles traveled for shopping purposes by approximately 12,000 miles per day. This reduction in vehicular miles traveled would be translated into energy savings and improvements to air quality in the region.

Some seasonal jobs. at low pay scale— Kind of job should be considered here and length of time people [illegible] in those jobs.

Development of the proposed mall is expected to generate approximately $21.1 million in wages for construction industry workers, approximately 45 percent of whom would be from the New Haven metropolitan area. Mall operations would create a net addition of 1,250 to 1,400 permanent jobs,

which would generate $8.2 million to $9.5 million in wages each year. Taking into consideration the multiplier effects used to predict secondary economic benefits, the construction phase of the mall would have a one-time impact of $24.5 million in regional economic activity. Operation of the mall would result in long-term secondary economic benefits of between $20 and $24 million annually, which translates relatively into a potential addition of 1,300 to 1,600 jobs in the metropolitan area.

The town of North Haven would receive significant fiscal benefits from the proposed mall. Local property tax revenues produced by the mall would likely exceed maximum town costs associated with mall-related services by more than $1 million annually. Assuming a continuation of current service levels in the town, this surplus is sufficient to have the effect of reducing the current property tax rate by 6 percent. The town would also achieve a long-term goal of developing a portion of its commercial/industrial corridor.

Secondary development projected to be generated from the mall would occur in this corridor and would be consistent with town plans and zoning. This secondary development is likely to be in the form of retail sites fitted in along Washington Avenue as well as secondary retail and small-scale office development along the east side of Valley Service Road.

S.T.M/CCAG sees secondary development as clearly detrimental to town's quality

(b) Adverse Impacts

The principal physical impact associated with the proposed mall is the development and alteration of 78 of the site's 117.5 acres. This includes the filling of 25 acres of wetlands and water courses, 17 of which were created by quarrying and mining activities. Although no endangered or threatened species would be affected by the development, there would be displacement and some mortality of wildlife, especially of small reptiles, amphibians, and mammals such as mice and moles.

A.C.E. please check Naugatuc Mall to make judgement about affect of sec. building.

The proposed project contains three archaeological sites that are eligible for listing on the National Register of Historic Places. Construction-related impacts due to the placement of fill and/or parking facilities over these areas could damage artifacts or compact the soil enough to destroy stratigraphic evidence. To mitigate this potential impact, a preconstruction excavation plan to obtain a representative sample of archaeological remains would be required of the applicant should a permit be approved.

Another adverse impact would be the reduction in retail sales at other major retail areas. This is projected to range from 8.5 to 13.2 percent of existing sales volumes.

27% mentioned later - next page says 22%

Local traffic would increase and some residential roads would experience additional vehicle movements. On some access roads, there would be an increase in congestion normally associated with malls during peak use.

no mention that peak use means DAILY congestion

whole ¶ at top of page on secondary economic benefits and no mention of the hideous secondary building and development of surrounding areas.

Areas of Controversy

During the preparation of this report there have been several opportunities for area residents, government agencies and the general public to express their views about the proposed project. It is evident from comments made during the application's public notice period, the scoping sessions, and the development of this DEIS that there is a wide range of concerns, perceptions and desires. Major local issues over the proposal include the following:

1. The effect the proposed fill would have on flooding;

2. The mall's potential economic effect on surrounding communities if it is successful, and the opposing case of what would occur if the mall experiences retail failure;

3. The controversy among the area's residents as to whether a mall is needed, or wanted, and how a mall might affect the town's character and social community structure; and

4. The Connecticut Department of Transportation's proposed widening of Bishop Street, which has historical value and over which mall-related traffic would pass.

To address the first of these issues, a study on flooding was undertaken. It demonstrated that the mall would have no measurable impact upon flooding in the Quinnipiac River flood plain since the mall area does not contain enough flood storage capacity to significantly affect the volume of water carried by the river. The planned detention pond would reduce peak discharges of storm water to the river from the site and upland areas during intense storms.

To address economic impacts and concerns, a retail market analysis was conducted. It indicated that construction of the proposed mall would reduce shoppers goods sales (department store-type merchandise, apparel, and home furnishings) in the central business district of the city of New Haven and in Hamden. The "worst-case" effect would be approximately an 8.5 percent maximum decline. The consequential fiscal impact upon the city's tax base would be nominal at approximately 0.3 percent. Other projections indicate sales declines of up to 22 percent, with other secondary effects.

The third area of controversy is the development of the mall itself--some residents favor the mall's development in their local area, and others disapprove of it. This controversy reflects personal preferences, the perceptions of the project's potential impacts, and the degree to which the mall is perceived as representing a change (either "good" or "bad") in the local character and residents' lifestyles.

(to be more precise, the plaintiff is Bishop ST Preservation Committee and not only controversy but litigation) 355

The proposed widening of Bishop Street by the Connecticut DOT has been a point of controversy between the local residents and the transportation department. Area residents feel that the widening is only necessary to carry the additional traffic that the mall would generate, and the expenditure of funds on it is a concession that favors the construction of the mall over the historic values of the area. The DOT has said that considerations to improve Bishop Street predate the mall proposal, and that modifications are needed even without the mall's presence. This matter has been the subject of a separate Federal/State environmental review and will not be addressed further in this impact statement. *

→ identifies protagonists:

→ but accepts construct of one of the protagonists without recognizing any need of looking further thus (inconsistent ignoring the fact that there is controversy; this is, i.e., BIAS.

Unresolved Issues

Several State and local permits and approvals are still needed by the applicant, including a water quality certification from the Connecticut Department of Environmental Protection, and a traffic certification from the Connecticut State Traffic Commission.

→ Areas of controversy extend much further. It is biased in favor of developer not to include all here

* These are precisely the points in question: "Considerations" to improve Bishop ST do antedate the mall proposal but this means, in itself, nothing: "considerations" are not definitive and the original improvements considered were little more than a traffic light and turning lane (see TOPICS study of 1970). The real impetus to widen the street substantially came with then First Selectman Gott's letter (4-18-75) to Regional Planning, a letter which cited the Mall as a reason for this widening. Since then the Mall has been a sword of Damocles over this project. Bishop ST residents have felt wronged enough to initiate litigation. The courts may vindicate them: how biased, then, and how grossly unaware would this document, and ACE, appear. ACE should at least await a decision on whether or not the widening of Bishop St. constitutes a mall impact.

DRAFT ENVIRONMENTAL IMPACT STATEMENT
NORTH HAVEN MALL
NORTH HAVEN, CONNECTICUT
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I. PURPOSE OF AND NEED FOR THE PROPOSAL

One purpose of the proposed mall development is to serve a public need for a depth and variety of shoppers goods and merchandise not now available in the New Haven Standard Metropolitan Statistical Area (SMSA), and to promote an increased level of merchant competition which could sharpen and improve retail services to area shoppers. unsubstantiated

Under the proposal, the mall would introduce one new department store to this marketplace (G. Fox), two expanded department stores (J.C. Penney and Sears), and another that has long been associated with Metropolitan New Haven and seeks to improve its market coverage and penetration (Macy's). The purpose of establishing such a mall would be to couple these anchor establishments with the diversity of specialized stores, that would be featured in the proposed mall, to fill a current void identified in the metropolitan area retailing base. only identified by developer

A public need for such a regional shopping mall has been demonstrated on a retailing basis and is partly illustrated by the New Haven metropolitan area's current loss of approximately $66 million in expenditures to nonmetropolitan retail facilities. This leakage of sales is predicted to increase in the next decade without the provision of new, large retail facilities within the metropolitan area. A centrally located major retailing facility would reverse this leakage and enhance sales flows into the metropolitan area from nearby, nonmetropolitan communities. Development of additional retail shopping of the type offered at a regional mall is necessary to meet a public need currently unserved by existing retail outlets within the metropolitan New Haven area. Although not a purpose of the proposal, a regional facility would help satisfy the consuming public's need to reduce the number of miles traveled for shopping purposes by offering a wide range of merchandise at a single central location. wrong term,

In addition to creating these retailing and consumer benefits, the proposal would also benefit other public needs. Tax revenues generated by the proposed mall would supply fiscal support for the town of North Haven and would provide jobs in the region. Development of the proposed mall would serve North Haven's need for satisfying long-standing land use and economic development plans formulated by the town to maintain adequate public services and affordable levels of property taxes. Any other development there would do the same ok. now, without it,

In addition to the public purpose of the proposal, it is also recognized that the applicant's purpose for the proposal is to provide goods and services for a profit within the private business sector. this should be mentioned first, in first ¶

II. ALTERNATIVES ASSESSMENT

A. PROPOSAL-NORTH HAVEN MALL DEVELOPMENT

1.0 GENERAL DESCRIPTION AND LOCATION

Mall Properties, Inc. proposes to develop a major regional shopping center known as the North Haven Mall in south central Connecticut. The proposed mall, planned for some 1.12 million square feet, would contain four major department stores and would provide a variety and depth of shoppers goods--department store-type merchandise, apparel, and home furnishings--as well as a number of services and entertainment opportunities.

The proposed mall site (Figures 1 and 2) is located in the town of North Haven, about 8 miles north of the city of New Haven. It is accessed by a regional and secondary highway network with nearby interchanges to Interstate 91 and the Wilbur Cross Parkway (Connecticut State Route 15). At this location, current zoning for the site would permit the development of a regional shopping center. The site is within a corridor the town has set aside for commercial and/or industrial development and is compatible with surrounding land uses.

At the North Haven site the proposed mall would serve a number of communities in the region. Its principal market area would include the cities and towns of North Haven, New Haven, Wallingford, Hamden, North Branford, East Haven, Bethany, Woodbridge, Orange, West Haven, Branford, Guilford, Madison, Durham, Middlefield, Meriden, and Cheshire.

If permitted, the mall opening is projected for late 1983, at which time approximately two-thirds of the programmed space would be occupied. Full operation and leasing would be expected by the end of 1985.

2.0 GEOGRAPHIC SETTING

The proposed 117.5-acre mall site lies along the eastern bank of the Quinnipiac River in the north central portion of North Haven (Figure 2). It is situated between the river and Washington Avenue to the east, and has been put to industrial use for some time. More than three-fourths of the site has been disturbed by quarrying and mining operations since it was used as a borrow pit for construction of Interstate 91 (Figures 3-5).

Report says elsewhere building starts in summer of 82 and take 2 yr

Land surrounding the site is in similar use, with quarrying in open areas to the south, the Pratt and Whitney aircraft engine manufacturing plant farther north, the Amtrak railroad embankment to the east, and heavy commercial development along Washington Avenue just beyond. In this area, Interstate 91 runs in a north-south corridor with an interchange (Exit 12) at Washington Avenue.

before repo. said all of site.

actual year round homes split level etc.

Across the river, west of the proposed mall site, is the Quinnipiac State Park. This had been a residential area for cottages, but due to flooding conditions Connecticut has acquired the area for a State Park. To the west of the park is the Wilbur Cross Parkway, a major north-south roadway with an interchange at Bishop Street near the proposed site.

3.0 PROPOSED MALL FACILITIES

3.1 Facilities for Shoppers

Plans for the mall include about 1.12 million square feet of retail space (gross leasable area), with about 820,000 square feet devoted to shoppers goods, 250,000 square feet to other types of retail and restaurants, and 40,000 square feet to services and entertainment. The four proposed "anchor" department stores, J.C. Penney, Macy's, G. Fox, and Sears, would be combined with the mall shops, restaurants, and entertainment facilities. Anticipated square footages assigned to the types of uses are indicated in Table 1.

3.2 General Features

before says 78 acres for total project

All stores and services would be housed in an enclosed shopping mall situated in the approximate center of the site (Figure 6). A separate theater building would be located in the northeast corner. These buildings and parking for 5,600 cars would occupy about 78 acres of the property. Landscaped islands would be interspaced in the parking area. A 16.5-acre, fenced-in pond is proposed at the southern end of the site for drainage and flood control. The pond would be connected to the river by culverts.

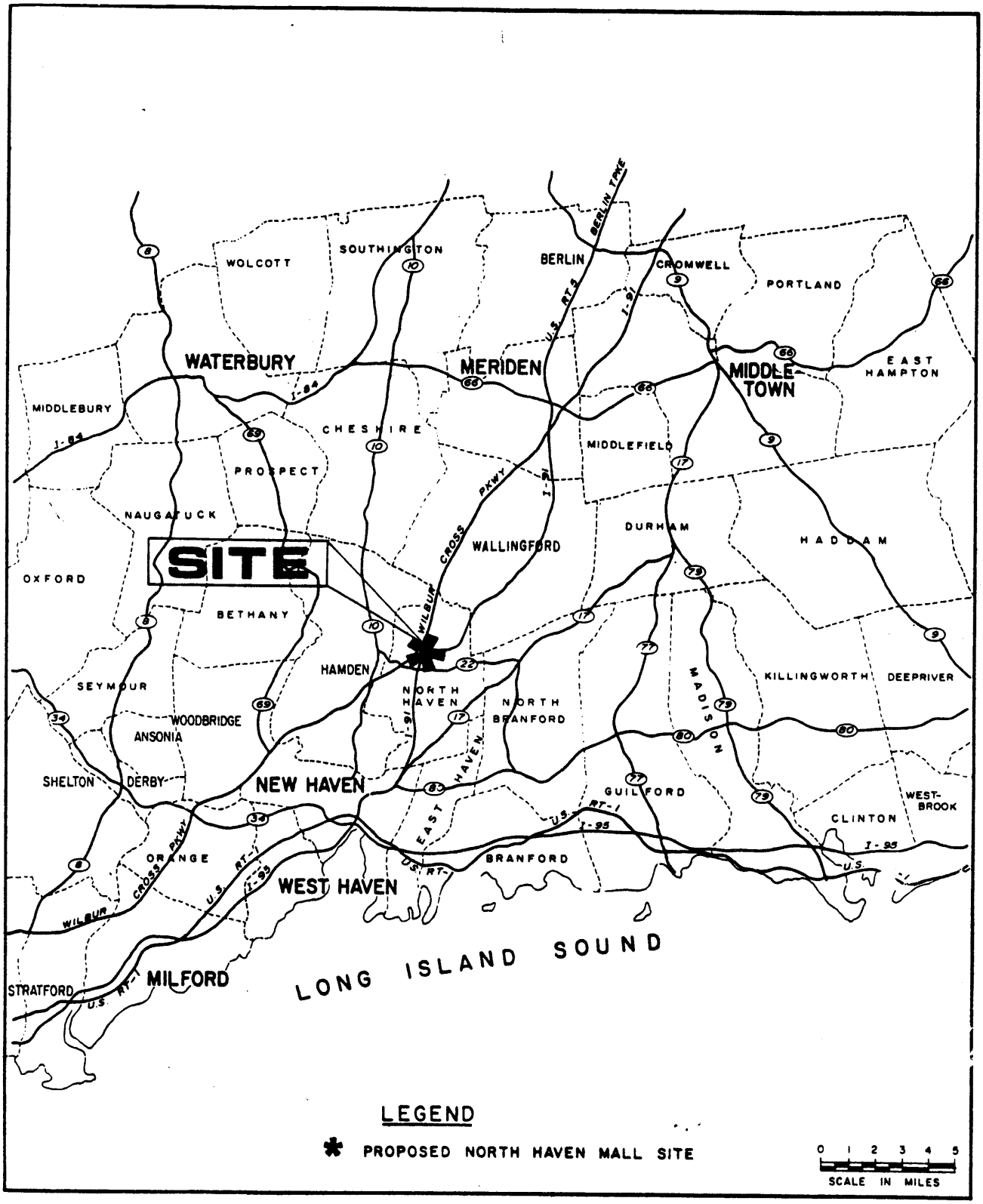
The proposal calls for a two-level mall to be constructed of steel elements with skylit central areas, and a textured masonry exterior with an off-white, quartz aggregate finish. Public entrances and interior spaces would include glazed tile paving and landscaping (Figure 7). There would also be landscaping around the buildings. No mention of solar orientation.

2 ft wide at top - trees insecure + toppling this sugg. real cover which it is not.

A buffer zone of trees on a natural berm would remain for a minimum width of 75 feet along the Quinnipiac River. In addition, woods to the north and wetlands in the southwest and northwest corners would be left in their natural state. To the east, Valley Service Road would serve as the border and an access route to the site.

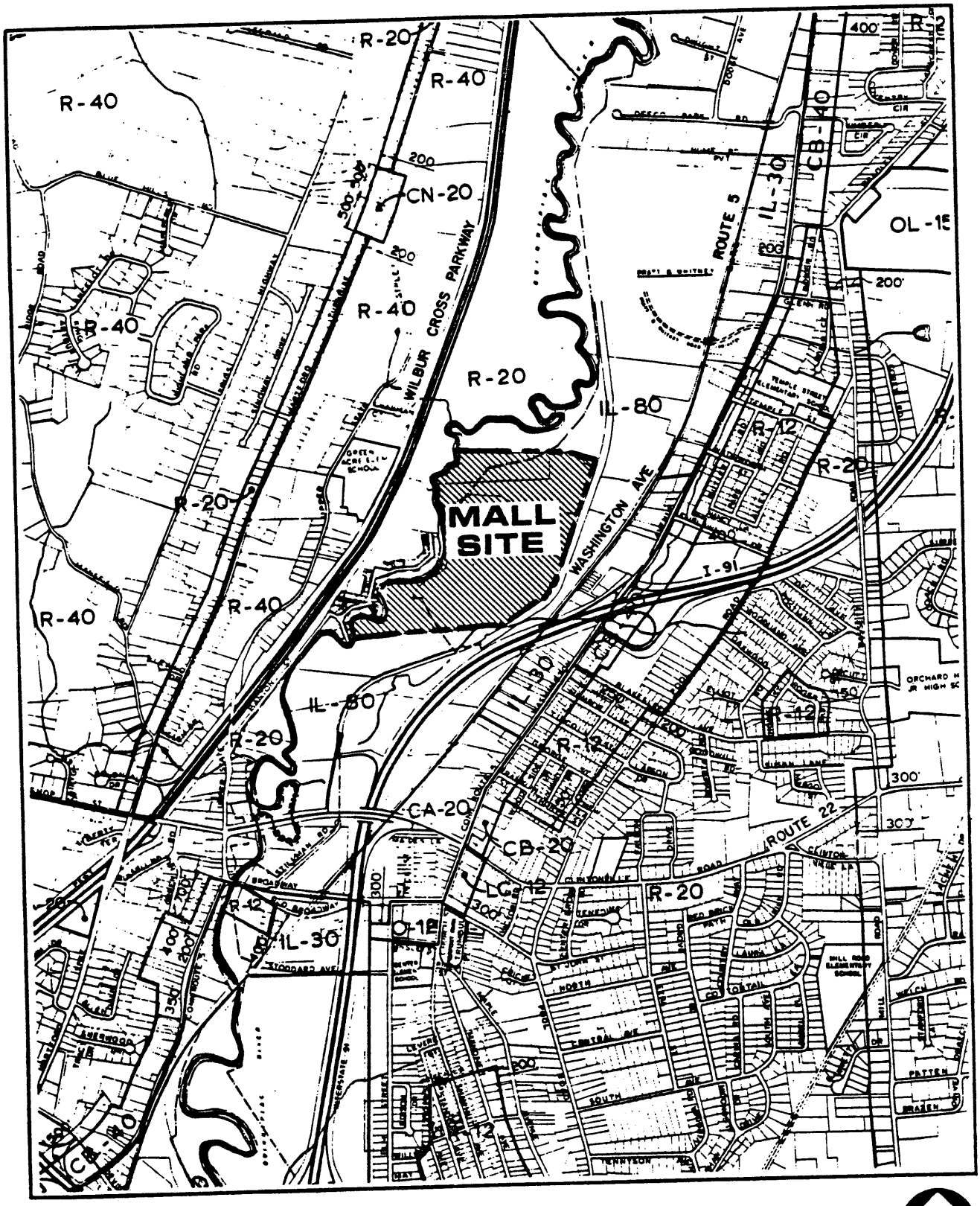
3.3 Modifications for Transportation/Access to Mall

In order to provide good access to the mall and to minimize impacts that mall-related traffic might have on local streets near the site, several transportation modifications are proposed or under construction. These include widening Washington Avenue (within the right-of-way) north from the I-91 Exit 12 interchange to near Wadsworth Street; constructing a new, four-lane access road, Mall Drive, between Washington Avenue and



North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 1
Regional Location



North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 2
Site Location

North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 3
Aerial View of Site 1

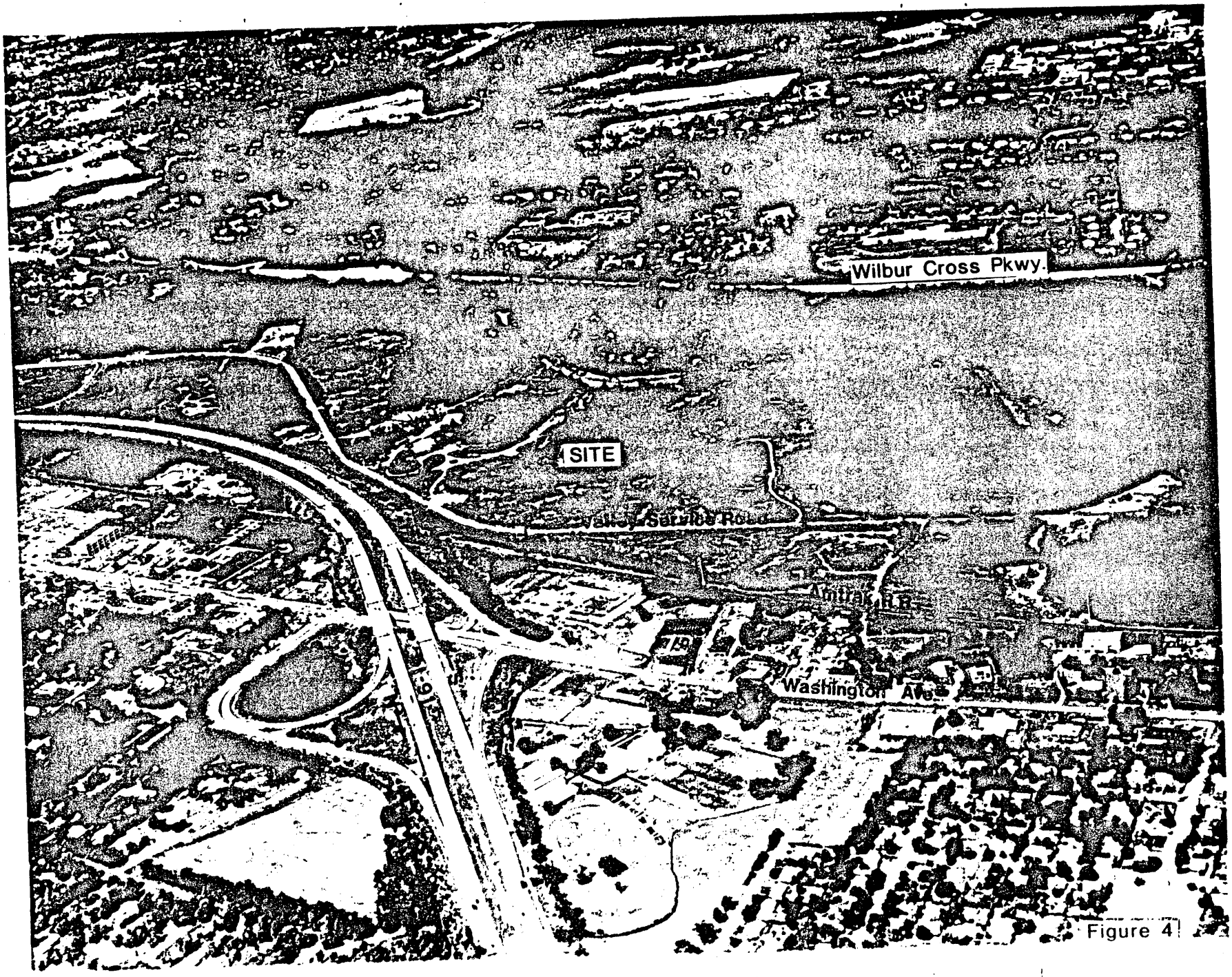

Wilbur Cross Pkwy.
SITE
Valley Service Road
Amtrak R.R.
I-95
Washington Ave.

Figure 4

367

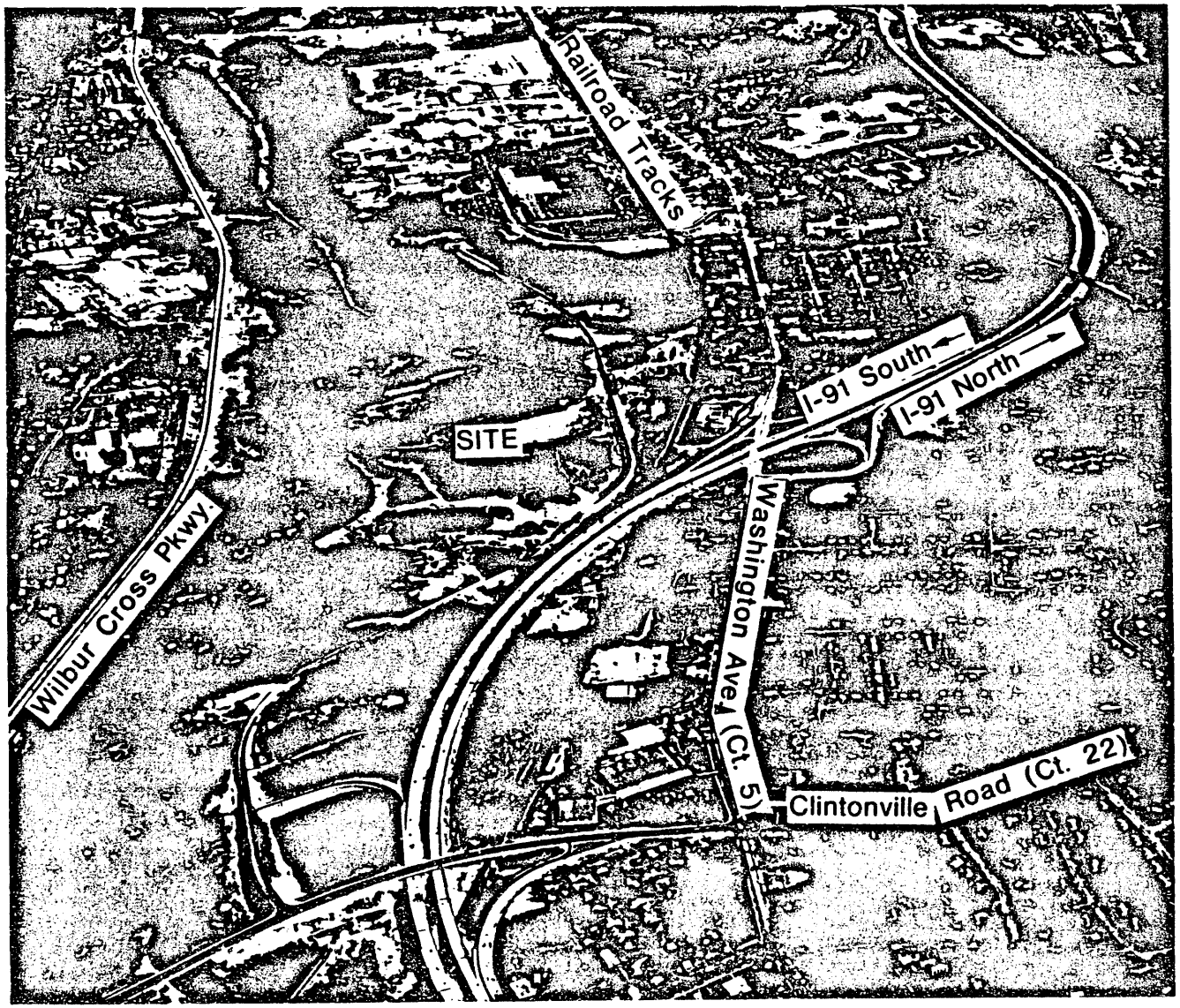


Figure 5

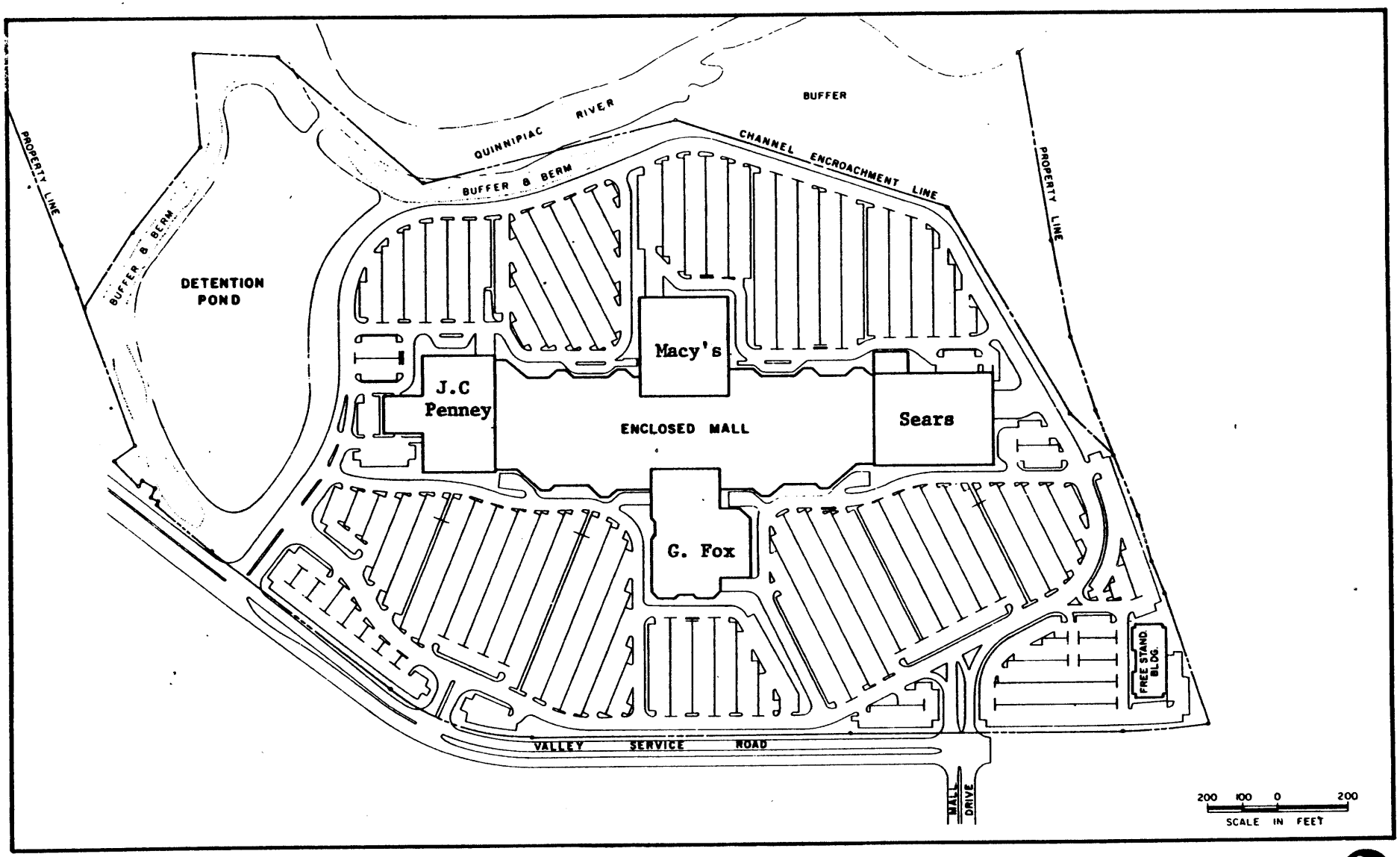
Aerial View of Site 3

TABLE 1
ANTICIPATED RETAIL MIX
NORTH HAVEN MALL

User Type	Gross Leasable Area (in square feet)
Retail	
Shoppers Goods	
Anchors	575,000*
Mall Shops	242,000
Total Shoppers Goods	817,000
Other Retail	169,000
Restaurants	90,000
Subtotal Retail	1,076,000
Non-Retail (Services and Entertainment)	40,000
Total Mall	1,116,000

*Includes about 30,000 square feet available for expansion but not to be built initially.

Source: Appendix L, Economics and Land Use



North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 6
Site Plan of Proposed Mall

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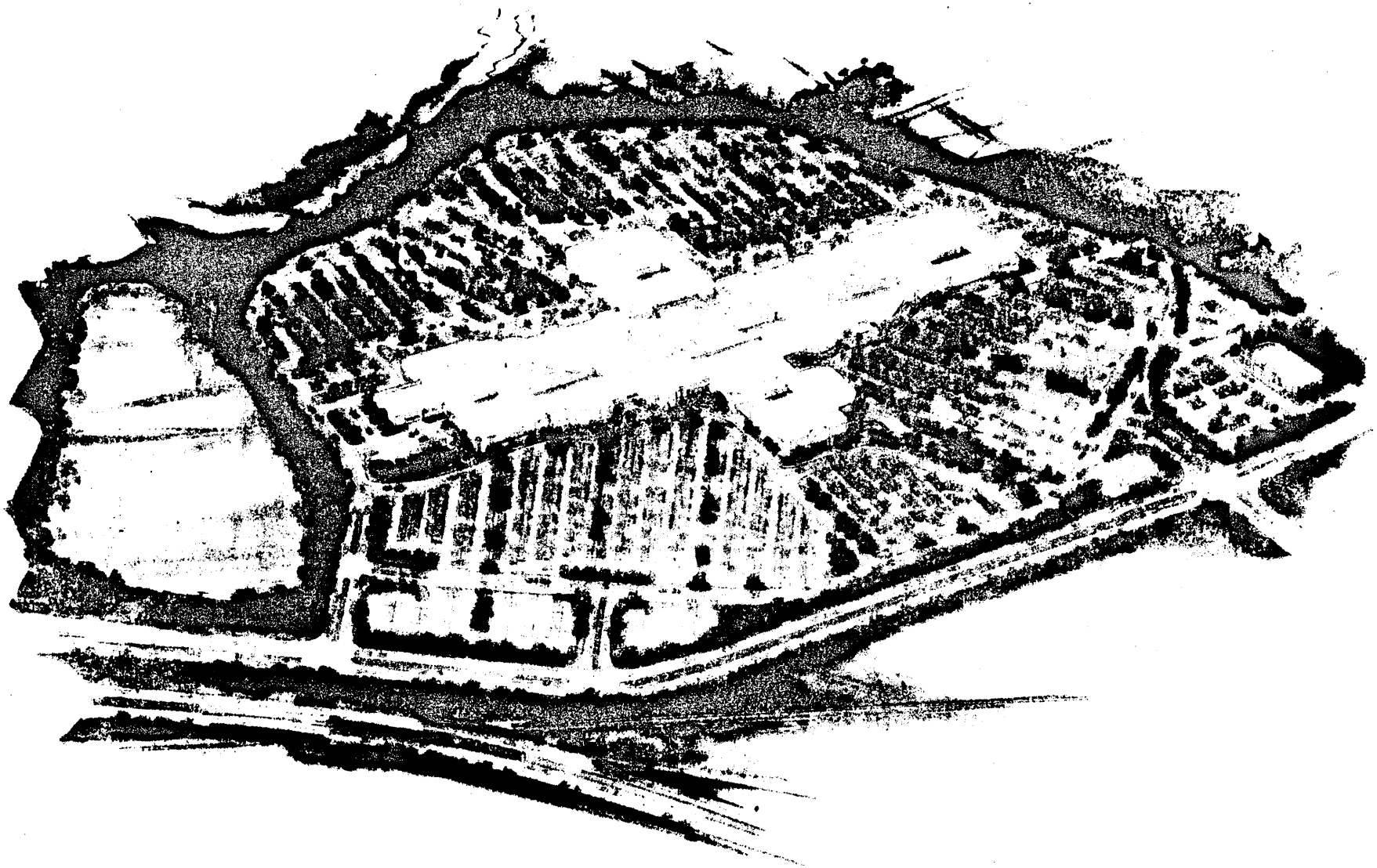


North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 7
Architectural Rendering

Source: Mall Properties,Inc.

Valley Service Road (this activity would include construction of an underpass beneath the Amtrak railroad); widening Valley Service Road to four lanes from Route 22 to Mall Drive; and constructing a "jughandle" on the south side of Route 22 to facilitate the left turn onto Valley Service Road from eastbound lanes. Modifications for improved access include all signs, lane markings, traffic controls, sidewalks, curbs, dividers, guard rails, turn lanes, and drainage facilities. The town would be responsible for the railroad bridge and a portion of the Valley Service Road widening. The responsibility for these are identified in an agreement between the town of North Haven and Mall Properties, Inc. (North Haven, 1978).

Does not identify if sidewalks go all the way through & provide walk way access thru Pkg. lot

B. ALTERNATIVES EVALUATION*

1.0 INTRODUCTION

The analysis of alternatives to the proposed North Haven Mall focused on five major categories:

- A comparable retail center at an alternative single-site location or expansion of an existing center.
- Comparable retail services using two or more locations.
- Alternative configurations for the proposed mall, including a reduced scale of retail activities and alternative project designs.
- Alternative uses of the site.
- Evaluation of environmental consequences for expected future conditions at the site for the no-action situation.

2.0 SINGLE-SITE ALTERNATIVES FOR COMPARABLE RETAIL FACILITIES

no

It is inappropriate for ACE to consider that other site was possible. ACE should only rule on whether Mall site was possible or not.

A screening analysis was used to locate potential sites that could be used for a single large retail facility that would serve the purpose and need for the proposal. Prospective sites were then screened to determine which sites were suitable and practicable for a regional center that would accommodate the proposal's retail market.

2.1 Screening Criteria

Twelve criteria were grouped according to general importance, i.e., whether failure to meet a certain criterion constituted an "overriding problem," a "serious constraint," or might generate a potential impact which would restrict site development or require investigation and possible mitigation. These criteria include the following:

---

* Supporting data and information are presented in corresponding companion appendices. Therefore, reference citations to specific appendices are made only where section headings do not indicate the evident reference source of information, or attention is added.

Overriding Problems
Access sufficiency
Compatibility with adjacent land uses
Legal and political constraints (status)

Serious Constraints
Site land use constraints
Market coverage and site location
Site size
Infrastructure

Other Constraints
Flooding
Water quality and wetlands
Air and noise quality
Historic and archaeological resources
Local traffic

2.2 Single-Site Alternatives

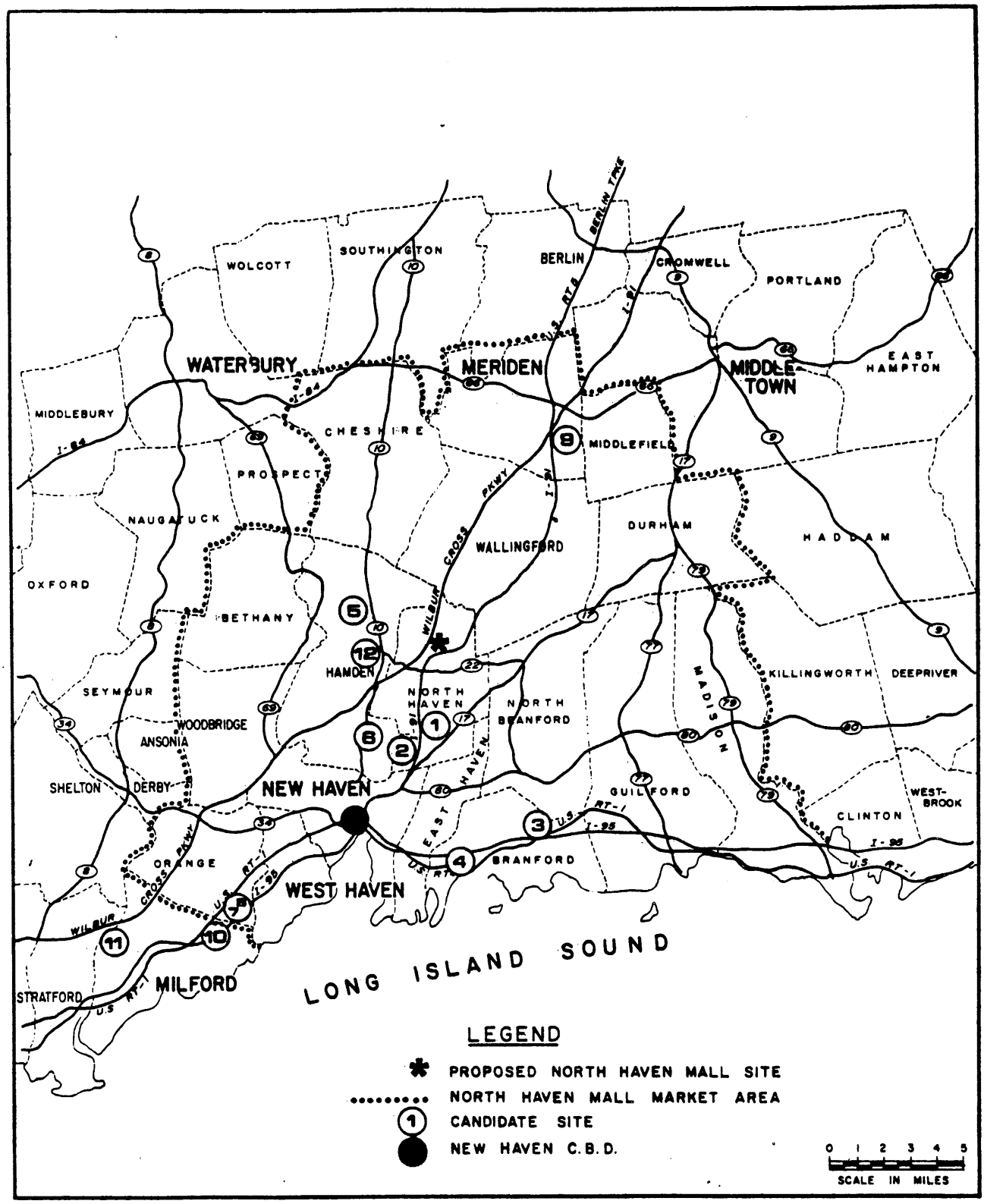
2.2.1 Initial Screening

A list of 12 potential alternative sites was developed from suggestions made by area realtors, government agencies, and citizen groups. Data on each site were collected through a process of field visits; interviews with public officials, realtors, and developers; and review of public ordinances and regulations.

Each of the 12 candidate sites (Figure 8, Tables 2 and 3) was evaluated in terms of the three critical screening criteria which would preclude development of a major retail center. Seven sites were judged infeasible for development due to one or more overriding problem. They include the Bailey Road, Terminal Road, I-95 (Exit 53), Evergreen Avenue, and Putnam and Morse Streets sites. The Lambert Road site was eliminated because its access characteristics are less desirable than those of another candidate site directly across the road (Marsh Hill Road). Finally, the Pomeroy Avenue site in Meriden is not a feasible alternative since its development would impede a watercourse and violate the riparian rights of a contiguous property owner (Attachment B of Appendix Q).

2.2.2 Second-Stage Screening

Results of the second-stage analysis (Table 2) indicate that none of the five remaining candidate sites have both the central location and adequate size to provide comparable retail service to the market area. Additional severe constraints associated with Branford and Hamden "Magic Mile" make these two locations impractical. The other three remaining



North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 8
Candidate Site Locations

Source: Appendix Q, Alternatives Assessment

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Table 2

ALTERNATIVES SCREENING MATRIX*

Site	Overriding Problems: Access	Overriding Problems: Land Use Compatibility	Overriding Problems: Legal or Political Constraints (Status)		Serious Constraints: Land Use Constraints	Serious Constraints: Market Coverage or Locations	Serious Constraints: Site Size	Serious Constraints: Infrastructure		Other Constraints: Flooding	Other Constraints: Water Quality (Wetlands)	Other Constraints: Air and Noise Quality	Other Constraints: Historic and Archaeological	Other Constraints: Local Road Improvements
1. Bailey Road North Haven	X	X	X		X		X			X	X	X		X
2. Terminal Road, North Haven	X	X	X		X					X	X	X		X
3. I-95, Exit 56, Branford			X		X	X	X	X						X
4. I-95, Exit 53, Branford	X	X	X			X	X					X		X
5. Evergreen Ave., Hamden	X	X	X							X	X	X		X
6. Putnam & Morse Sts., Hamden	X	X	X				X					X		X
7. Marsh Hill Road, Orange						X		X			X			X
8. Lambert Road, Orange		X				X	X	X				X		X
9. Pomeroy Ave. & E. Main St., Meriden			X		X	X		X		X	X			X
10. Conn. Post Expansion, Milford						X		X		X	X	X		X
11. Milford Pkwy. & Wilbur Cross Pkwy., Milford	X				X	X		X			X			X
12. "Magic Mile" Expansion Hamden			X		X		X					X		X
Valley Service Road (Proposed) North Haven								X			X		X	X

*Modified from Appendix Q, Alternatives Assessment.

what about state park across river

have you seen site?

If they expect lower parking lot to flood doesn't

hat indicate to you hat flooding is a constraint They have to deal with? This report contradicts itself.

Site	Valley Service Road, North Haven	Bailey Road, North Haven	Terminal Road, North Haven	I-95, Exit 56, Branford
Overriding Concerns:				
Access	Access provided by I-91, Wilbur Cross Parkway, and an arterial network.	No access to highway except through circuitous local street network.	Same as Bailey Road.	Access to I-95 interchange and U.S. 1 available.
Land Use Compatibility except state park	No conflicts exist with surrounding land uses. Site is located in the town's industrial/commercial corridor.	Site is located in a heavy industrial area, incompatible with a regional retail facility.	Same as Bailey Road.	No conflicts with surrounding land uses.
Legal or Political Constraints	Development of the site is actively being pursued with support of town administration.	Site is currently being developed as an industrial park.	Site is currently under contract for industrial park development.	Recent attempts to develop the site for use as a shopping center were rejected by the town.
Serious Constraints:				
Land Use Constraints	Site was rezoned to allow for shopping center use.	Zoning change required.	Same as Bailey Road.	Only a small and inadquate portion of the site would allow shopping center use.
Market Coverage	Site centrally located. Covers entire targeted market area.	Site centrally located. Generally covers entire targeted market area.	Same as Bailey Road.	Site would cover eastern portion of the targeted market area.
Site Size	Development of 78 acres of the 117.5-acre site would be adequate for a regional mall development.	The 63-acre site is adequate for a regional mall development.	The 129-acre site is adequate for a mall development.	The 30-acre site could accommodate less than 500,000 square feet of retail space, not sufficient for size of proposed facility.
Infrastructure	No water or sewer services available. Construction of connectors and improvements to water system under agreement by town and developer.	Water and sewer services are available.	Water service is available. Sewer service would require construction of a 1/2-mile trunk line.	No water or sewer service available. Sewer connection may be simple to achieve. Water connection could be more difficult.
Other Constraints:				
Flooding	No measurable impact on flooding in the Quinnipiac River is expected. Stormwater discharge to the river would be reduced.	Overflow traverses the site. Filling could impact upon upstream areas; impediment to development not known.	Portions of the site may encroach upon conveyance way, increasing potential for flooding. Impediment to development not known.	No apparent problem.
Water Quality (Wetlands)	No contravention of water quality standards is anticipated. Approximately 25 acres of wetland would be lost to development.	Location of site in coastal zone management area and in the tidal wetlands which could signal potential water quality problems.	Same as Bailey Road.	No apparent problem.
Air and Noise Quality Diff. significance for some one who lives there.	No significant impact anticipated. Some additional noise can be expected from "by-pass" traffic on local neighborhood roads.	Air and noise quality would depend upon the local street access provided.	Access confined to local residential streets could cause air and street access provided.	No apparent problem.
Historic and Archaeological	There are three areas with potentially significant archaeological sites. Mitigation would be required.	No apparent problem.	No apparent problem.	No apparent problem.
Local Road Status	Several modifications by town and developer are proposed to accommodate mall traffic on Washington Ave., proposed Mall Drive, Valley Service Road. Some additional traffic expected on local roads, would increase activity on road, loss in level-of-service not to exceed one level.	Road improvements are needed in light of insufficient access to the highway.	Local roads would require extensive widening and improvements.	Some improvements may be needed along local road connector and U.S. 1.

*Modified from Appendix Q, Alternative Assessment.

candidate sites are Marsh Hill Road in Orange (7), expansion of the Connecticut Post Center in Milford (10), and a site near the intersection of the Milford Parkway and the Wilbur Cross Parkway in Milford (11). These sites are all close to one another at the southwest edge of the market area and more than 30 minutes driving time from the northern and eastern sectors. Therefore, Cheshire, Wallingford, Durham, Meriden, Middlefield, North Branford, Guilford, and Madison would not be well served. These eight towns represent a substantial portion of the total market area, and none of these sites would provide comparable service for meeting the retail needs in the market area of the proposed North Haven Mall.

2.3 New Haven Central Business District (CBD) Alternative

Examination of the city of New Haven as an alternative to the proposed North Haven Mall focused on the downtown area. No other section of the city offers the opportunity for a sufficient concentration of retail activity to attract a significant number of shoppers goods facilities. After analyzing department store location strategies, sales projections, site constraints and limitations in the New Haven CBD, and funding needs confronted by the city (Appendix L, Economics and Land Use), it was projected that downtown New Haven cannot serve as a single-site alternative to the proposed North Haven Mall or as a component in a combination of alternatives. Contrary to the above findings, the city of New Haven believes that downtown shopping could serve as an alternative to the North Haven Mall development. Presently, the city is under agreement with the Rouse Company, a national development firm, to create an additional 400,000 square feet of retail space with the possibility of attracting one new department store. This would be an adjunct to the 600,000 square feet of existing retail space and would potentially double downtown retail sales. To further improve its attractiveness, New Haven is revitalizing other parts of the downtown area through cooperative private business ventures. This includes improvements to the Shubert Theatre area, and existing shopping, hotel, and business offices (proposed Chase Enterprises/Olympia and York venture to construct a new 600,000-square-foot office building).

Two reports, commissioned by the city of New Haven, agree that the economic vitality of the city is important to the region's economy as a whole (Halcyon Ltd., October 1978; American City Corporation, April 1981). The degree, however, to which New Haven's retailing core may provide an alternative at the level of comparable shopping offered by the proposed mall has not been demonstrated. A market analysis or other consumer preference indicator is not available from city proponents to show at what level New Haven could serve as an alternative in the retail area that would be served by the proposed North Haven Mall.

Shouldn't city proponents be the ones who should provide that data?

3.0 COMBINATIONS OF COMPARABLE RETAIL SERVICES

The sites considered here are those that survived the initial screening, since they were the sites not eliminated by severe constraints. In Branford, the Planning and Zoning Commission has limited the amount of land available for retail development at the candidate site and it is, as a result, too small for a major facility. In Hamden, the Dixwell Avenue retail corridor is densely developed and expansion would involve building over existing parking lots and constructing new multi-level parking garages. This would have to be done in areas owned by existing retailers. As a result, any development to expand the retailing base here to satisfy market needs would have to be undertaken and contracted through the owners. Development of this nature is not foreseeable and not practical without the owners' impetus.

As discussed previously, the three other sites for potential development that survived the initial screening are at the southwest edge of the market area. At this location they would not offer, either as a single-site alternative or in combination, the needed convenient access to retail services for consumers in the northern and eastern areas of the North Haven Mall market area.

Two other concepts suggested as alternatives during the scoping process included retail services at additional small retail centers or at freestanding sites for major department stores dispersed throughout the market area. The small retail centers attract fewer shoppers than a regional retail facility and serve smaller market areas. They cannot offer a comparable level of retail service or a similar range of shoppers goods. Locating major department stores at single freestanding locations is not a practical alternative, since the viability of any major retail outlet offering a broad range of shoppers goods requires a critical mass of comparable activity in order to generate sufficient market attraction and level of sales to survive. This is a principal reason why mall retailing is attractive to and favored by many retailers and consumers as evidenced by malls' increasing numbers. Several small retail centers at separate locations would not provide the level of comparable shopping offered at a major facility located to accommodate a large market area.

4.0 ONSITE ALTERNATIVE CONFIGURATIONS

4.1 Alternative Layouts

Because of the location of the Quinnipiac River channel encroachment line, site constraints mandated by the Inland Wetlands Commission, and parking requirements imposed by the town, the remaining available land does not permit alterations or modifications of design for a four-store mall which would yield any benefits to vegetative preservation.

4.2 Decked Parking Facilities

Should not concern A.C.E. A.C.E. should not be seeking the most income for the developers.

Decked parking is prohibitively expensive and Mall Properties, Inc., believes that this would reduce their incentive because the competitive position of the proposed mall would be compromised. Deck parking is usually associated with central business districts where there are no viable alternatives for parking because of extremely high land costs or minimal land vacancy. The vegetative preservation that might be gained would be marginal because the onsite road network would generally result in preserved areas being small and isolated, thereby minimizing value as wildlife habitat (further details in Appendix O, Alternatives Assessment).

4.3 Multilevel Mall Structures

Since only a small proportion of the mall's land area is required for mall structures, no significant reduction in land requirements can be achieved through the provision of multilevel structures. The same amount of retail space housed in multilevel structures would reduce land coverage by 3.7 acres, less than 5 percent of the total project area.

4.4 Reduced Scale of Facilities

Should mention that the smaller size was what was actually described to voters when voters agreed to support mall with funds.

This onsite alternative incorporates design changes to effect a smaller sized mall. To consider the effects of such a mall, a three anchor-store facility was considered. Although no retail market analysis has been conducted on a three-store mall, the reduction in retail space would diminish the center's ability to meet the full retail demand that exists. It appears reasonable, however, that a three-store mall could satisfy a substantial part of the need for additional retail space in the region.

A three-store mall would represent a significant reduction in the size (approximately 25 percent) and retailing diversity of the proposed North Haven Mall. A 25 percent reduction in floor space would eliminate approximately 200,000 square feet for the proposed mall. Of this, approximately 60,000 square feet would be in mall shops and 140,000 square feet in one anchor store. This would reduce the 817,000-square-foot area devoted to shoppers goods in the proposal to a 613,000-square-foot facility. Overall, the three-store facility would comprise approximately 840,000 square feet of total retail space.

Along with the reduced size, there is the potential that a smaller mall would not have the drawing attraction of the larger mall and thus experience a decline in sales productivity below the projected $97 and $121 per square foot for the proposed mall anchor stores and specialty shops, respectively. When compared to the four-store mall, at the projected productivity levels, sales could be reduced by approximately $21 million if a three-store facility were developed.

Conjecture

A conceptual layout of a three-store mall is shown on Figure 9. Its smaller size would result in decreased construction costs of approximately $1.4 million for fill and parking and $5.5 million for structures.

At present, there is no developer who proposes a three-store facility. Mall Properties, Inc., is opposed to such a restriction. It is possible that no mall would be built at the option of Mall Properties, Inc., if they were limited in their development to a three-store mall. This could result from a smaller mall's reduced profitability, consideration of market dynamics, and the developer's contractual commitments with the anchor stores in a four-store arrangement. Potential legal complications could arise if Mall Properties, Inc., were to attempt to sever its obligations with one of the four anchor stores. As such, a three-store mall is not a foreseeable alternative for satisfying the need for additional retail space in the region.

no information available to ACE on extent of their agreement.

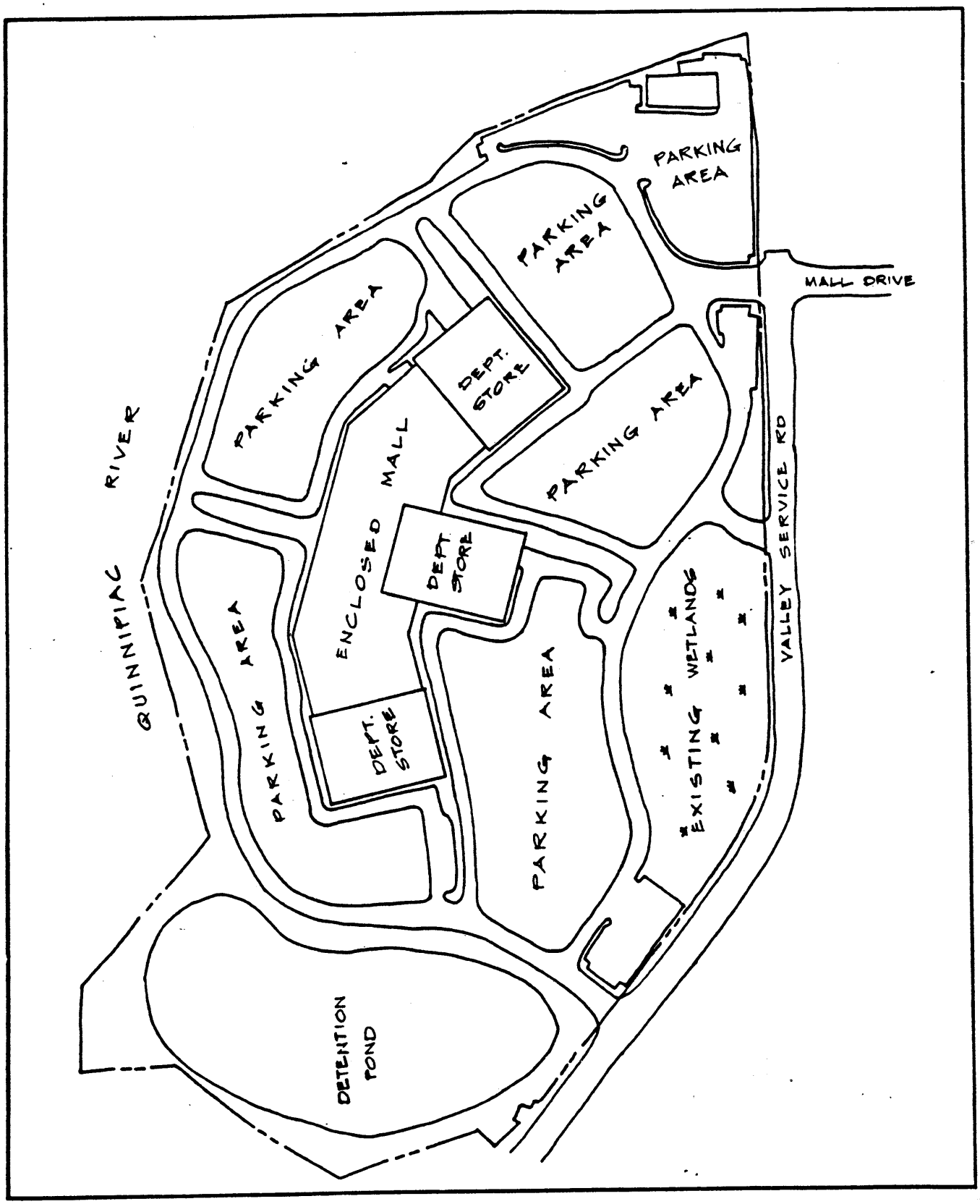
5.0 ALTERNATIVE USES OF THE SITE

5.1 Use Options

At least three options (Table 4) exist for use of the proposed site if the mall project does not proceed--the no-action alternative. One option is that the site would continue to be available for commercial/-industrial development. To evaluate the degree to which the site might be utilized by industry, it has been projected that if the town of North Haven could capture its share of regional industrial development, and all of it were placed at the proposed site, that approximately 20 to 26 acres of the site would be utilized. This represents approximately 25 to 30 percent of the site's area that potentially could be used for commercial/-industrial growth and development. There is little factual data for determining the potential for commercial growth and development in the region and in North Haven. It is not possible to make quantitative predictions on the demand for developing commercial space on any or all of the proposed site, however, the potential attractiveness of the site can be considered relative to commercial/industrial uses. Aspects favoring the site's use are the following: (1) its location between New Haven and Hartford; (2) its access between major highways affording commuter and commercial traffic; (3) its size which could accommodate most large industry uses if wetland fill were permitted; (4) its zoning for appropriate industrial use; and (5) its compatible use with surrounding areas.

this ignores fact that 2 sites of 131 acres are currently being developed with enthusiasm by realtor & dev. here in No. H.

Aspects that potentially do not favor the site for commercial/-industrial use are as follows: (1) the high cost to provide the site with infrastructure, especially if less than the entire site were needed; (2) the availability of other desirable and less costly parcels of developable land for those projects not needing the access or the entire 117 acre site; and (3) the need to acquire wetland-related permits if any wetland area on the site were to be developed.



NORTH HAVEN MALL

VALLEY SERVICE ROAD

NORTH HAVEN, CONNECTICUT

CONCEPTUAL 3
DEPARTMENT STORE MALL

Figure 9

SOURCE: Appendix Q, Alternative Assessment

TABLE 4
SUMMARY COMPARISON OF ALTERNATIVE USES OF THE SITE*
(MALL VS. NO-BUILD ALTERNATIVES)

	Mall	Industrial/Commercial	Park	Continued Present Activities
Need	To provide the metropolitan New Haven area with a concentration, depth and variety of shopper goods merchandise not now available.	Regional demand for industrial/commercial acreage will increase by 280 acres between 1980 and 2000. There are a multitude of sites available in the New Haven area (including 2 in North Haven with a combined acreage of 192 acres) to fulfill this need.	The town currently has open space and recreational land, 42 acres per 1,000 population. This ratio exceeds accepted national and state standards.	Portions of the site are presently being used for quarry-related activities.
Likelihood of Occurrence	Only development option being actively pursued. Mall construction would begin if all permits are granted and approvals received.	Competition from other towns, current development of two other North Haven sites for industrial and office purposes, and the cost of infrastructure make it unlikely that this site would be developed for industrial or office uses.	Since the town has adequate passive park land, it has no plans to acquire any additional property for parkland in the vicinity of the proposed site.	Resumption of sand and gravel quarrying on the privately-owned central and southern portions of the site would likely occur without the proposed mall.
Likely Impact:				
Geology, Groundwater, Soils and Topography	Would reduce existing erosion levels and raise surface elevation. Groundwater quantity and quality would not be significantly affected.	Depending upon the actual design, impacts could be similar to or greater than those of the proposed mall.	Limited impact would depend upon type of recreational use and the need to change the sites present features and topography.	The potential for erosion would increase, and surface elevations would be reduced.
Surface Water and Water Quality	No contravention of water quality standards is anticipated.	Impact would depend upon actual use (~~i.e., heavy industry could cause serious problems~~).	Limited impact would depend upon type of recreational use.	Suspended sediments in the Quinnipiac River would increase.
Vegetation, Wildlife and Wetlands	There would be development of 78 acres of diverse vegetation and wildlife habitats, including 25 acres of wetlands. Some displacement and mortality of non-endangered species wildlife would occur.	Depending upon the actual design, impacts could be similar to those of the proposed mall.	Limited impact would depend upon type of recreational use and design of recreational facilities.	There would be a loss of wetland vegetation and wildlife habitats, and displacement of wildlife species. The present habitats would be changed into other ecosystems.
Archeological Resources	Could affect three sites with archeological potential. Mitigation would be necessary.	Depending upon the actual design, impacts could be similar to those of proposed mall and mitigation may be necessary.	Limited impact would depend upon the design of recreational facilities, mitigation may be necessary.	No impacts.
Flooding	No measurable impact on flooding in the Quinnipiac River is expected. Stormwater discharge to the river would be reduced for large storms.	Depending upon actual design, impacts could be similar to those of the proposed mall.	No measurable impact.	Could provide increased water storage capacity. Maximum available site storage would not significantly impact on flooding in the Quinnipiac River.
Traffic	Mall-related traffic would increase, but would not cause the level of service to fall to unacceptable levels on any of the access roads. State routes through residential areas would have increased traffic, inner neighborhoods may get some increase.	Since traffic associated with these activities normally occurs during peak rush-hour periods, depending upon size and type of activity, traffic problems could result.	No impact.	No impact.
Air and Noise Quality	No significant impact.	Depending upon activity, on-site use may cause traffic congestion and result in increased air and noise pollution.	No impact.	No impact.
Utilities and Infrastructure	Construction of connection lines to sewerage and improvements to water systems are needed. Local road modifications are necessary to accommodate mall traffic. The mall could contribute to the town's short-term solid waste disposal problems.	Depending upon the actual use and infrastructure needs, impacts could be similar to or greater than those of the proposed mall.	Some road improvements would be required. Water and sewer improvement could be necessary.	No impact.
Socioeconomic Resources	Enhancement of the regional economy (2,000 new permanent jobs - $8.2-$9.5 million wages) as well as the local economy ($1 million in new annual tax revenues) would occur. Development of mall would cause a decline in retail shoppers goods sales in areas in most direct competition, Hamden's Magic Mile and New Haven CBD, by a maximum of 8.5 and 8.3 percent, respectively, and other metro areas by 6.5 percent of 1990 baseline sales.	Demand for industrial/commercial use for this site is limited; socioeconomic benefits would likely be small. Development could require excavation, fill and alteration of wetland depending on size and configuration of development.	Opportunity to derive fiscal and consumer benefits associated with mall would not be realized. Park would not have significant positive or negative impact upon existing economic conditions; park could require excavation, fill and alteration of wetland depending on intended use.	Opportunity to derive economic and consumer benefits associated with mall would not be realized. Continued present activity would not have general public benefit. Activity could impact on the site's present environmental conditions. Excavation could lower topography and potentially create or alter wetlands, and negatively affect all potential development uses of the site.
Would regional retail need be satisfied?	Yes. Project would satisfy need for increased retail activities.	No. Would not satisfy need.	No. Would not satisfy need.	No. Would not satisfy need.

*Modified from Appendix Q

The negative aspects could be strong deterrents for a developer unless aided by the town with tax incentives. A likely scenario for the site might show that high development costs, potential time difficulties and discouragement in obtaining permits, along with other available developable land, could preclude industrial/commercial development in the foreseeable future at the proposed mall site.

A second alternative would be that the portion of the site which is owned by and available to the town could be developed and used for either active sports facilities or passive park recreation. Active recreation is the primary type of park function needed in North Haven. A park in this area would experience flooding if the site were not filled to a sufficiently high elevation, but it could be compatible with seasonally wet conditions if its facilities were not needed then. Park development, however, would not be consistent with the town's plans and goals to develop this site as part of their commercial/industrial corridor. The town, therefore, has not proposed a park development.

How was this determined?

The third and most probable no-action alternative use would be resumption of sand and gravel quarrying or mining on the privately owned central and southern portions of the site. This is the least preferable of various alternatives in generating local tax revenues, satisfying the public need for additional retailing, or maintaining present environmental quality in the area to be quarried. Should the site continue to be quarried it is likely that disturbed portions would be converted to open waters or wetted areas, and would support vegetative and wildlife communities similar to existing areas that have been previously altered. Under this no-action alternative it is probable that the present natural environment of the entire site could be altered, but eventually the site would be occupied by other natural resources. Prior to the resumption of any quarrying activity, a permit from the Corps of Engineers may be required.

Why is this altern. the most probable?

How can it be stated to "do" nothing with the land is the least preferable alternative environmentally. Also "continued quarrying" should be separated from "no action" as alternative. this contradicts statement on summary section (d)

TABLE 5
VEGETATION COMMUNITY TYPES ON THE
NORTH HAVEN MALL SITE*

Vegetation Community Type	Percentage of Site	Acres
Upland		
Upland Forest	17	20
Successional Shrub	2	2
Old Field	5	6
Disturbed	28	33
Developed	4	5
Subtotal	56	66
Wetland		
Wooded Swamp	20	24
Shrub Swamp	14	16
Marsh	1	1
Subtotal	35	41 **
Open Water		
Subtotal	9	10 ***
Total	100	117

* Acreages do not include vegetation community types associated with the transportation improvement areas.

** This total includes approximately 24 acres of natural wetlands and 17 acres of manmade wetlands.

*** All open water areas on the project site are manmade.

Source: Appendix B, Vegetation Wildlife and Wetlands

III. AFFECTED ENVIRONMENT*

A. TOPOGRAPHY, GEOLOGY, SOILS, AND GROUND WATER

1.0 TOPOGRAPHY

The project site has a history of earth-disturbing activities, which have generally lowered the site's surface elevations. Until recently it was used for sand and gravel operations, resulting in the creation of several ponds (totalling approximately 10 acres), some connected to the Quinnipiac River, and adjacent low-lying areas on the southern portion of the site. Part of the northern section was used as a borrow pit for construction of Interstate 91, thus creating the existing low lands. This activity by the Connecticut Department of Transportation also included development of a drainage channel across the site. This channel is essentially a relocation of an intermittent stream which had traversed the site prior to construction activities. Except for the quarry ponds, topographic relief is within a 10-12-foot range and the overall slope to the site is essentially flat.

2.0 GEOLOGY

2.1 Bedrock

Bedrock underlying the site consists of Triassic sedimentary rock belonging to the Lower New Haven arkose. According to the U.S. Geological Survey (USGS), bedrock varies from 0 feet Mean Sea Level (MSL) in the extreme northwestern portion of the site to 150 feet below MSL near the eastern edge.

2.2 Surficial

The DOT drainage channel runs east to west through the midsection of the site. South of the ditch surficial materials consist of coarse-grained deposits (sand and gravel: ice-contact stratified drift) extending to a depth in excess of 100 feet. In contrast, the area north of the channel is composed of fine-grained materials (silt and clay: glacial lake sediments). A great portion of this area is covered by a thin layer of granular materials of glacial outwash deposits and alluvium, with glacial lake sediments below at depths greater than 100 feet.

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* Note: Supporting data and information are presented in corresponding companion appendices. Therefore, reference citations to specific appendices are only made where section headings do not indicate the evident reference source of information, or for added emphasis.

3.0 SOILS

Soils naturally occurring on the site consist of seven different types comprising three basic groups -- granular (sand and gravel), fine-grained (silt and clay), and fill (silt and sand with some rubble). However, most of the land to be developed has been disturbed and consists of smoothed Udorthents, comprised of silt, sand and gravel that has been graded or reworked over the site. Topsoil is limited in both extent and depth. Recent test borings found it only in the northwestern and southwestern portions and nowhere did it exceed a depth of 1 foot. Soils have also been categorized according to how susceptible they are to erosion, or their erodibility.

4.0 GROUND WATER

The most prominent water-bearing unit on the site is the ice-contact stratified drift south of the DOT channel. North of the channel the value of surficial deposits for ground water recharge is limited. In general, site soils have a low permeability rate, indicating that recharge is relatively slow.

Ground water quality onsite appears to be consistent with regional quality, that is, good, with no excessive concentrations of objectionable constituents. No wells in the immediate vicinity of the site are known to be impaired or contaminated. Although ground water at the site was not tested, it is possible, given existing local land use patterns, extensive paved areas, and high use of roadway deicing compounds, that chloride and sodium concentrations in ground water near the site may be in excess of those recommended for domestic consumption.

In reviewing the valley configuration of the watershed, and the underlying soils, it is likely that nearly all the ground water at the site would come from offsite. Ground water flow would originate from the higher elevations of the watershed passing down toward the river and beneath the site. The water recharged at the site would remain shallow, being restricted by bedrock, a clay layer, or the short distance to the river where recharge would mix with its flow. The recharge at the site would not likely have the time or distance to filter into the ground water that would supply any municipal or private well facilities. Once near the river, shallow ground water and surface runoff would enter the river's flow and be carried downstream.

5.0 TRANSPORTATION MODIFIED AREAS

Neither topography, geology, nor soils in any of the transportation modified areas contain any unusual features different from those described above for the proposed site. Ground water levels are fairly near the surface, except along the proposed Mall Drive alignment. Recharge potential is limited, largely due to thick, relatively impervious underlying

deposits of silt and clay in the Mall Drive area and organic swamp deposits east of Valley Service Road.

B. VEGETATION, WILDLIFE, AND WETLANDS

1.0 VEGETATION

1.1 Mall Site

Mining and quarrying have largely eliminated the original sand plain (sandy deltaic deposits laid down by glacial Lake Quinnipiac) and have altered the site's natural vegetation. About 48 of the 78 acres proposed to be developed (of the total 117.5 acres) have experienced significant alteration.

Nine vegetative communities are found on the site and include both upland and wetland types (see Table 5 for approximate acreages). Upland communities, which comprise 66 acres, include forest, successional shrub, old field, disturbed, and developed areas. Wetlands comprise 41 acres and include wooded and shrub swamps, and marsh. Open water totals 10 acres. As a result of quarrying and mining operations, 17 acres, or approximately 40 percent of the site's wetlands and all of its surface water bodies, are manmade. Natural and manmade wetlands are scattered throughout the project area.

Upland forest, successional shrub, and old field communities are found primarily in the northern portion, whereas disturbed and developed lands occur largely in the central and southern portions.

1.2 Vegetative Analysis of the Site

Vegetative diversity is a significant factor in assessing an area's value as wildlife habitat. Of the nine vegetative communities found on the proposed mall site, six exhibit low diversity. These communities comprise approximately 60 percent of the site's acreage. The remaining three communities exhibit relatively moderate vegetative diversity. These include upland forest and successional shrub communities (some 19 percent of the site's acreage), and wooded swamp wetland communities (about 20 percent).

1.3 Transportation Modified Areas

Vegetation along Valley Service Road includes both upland and wetland types, with most of the site's nine communities represented. The area of the proposed jughandle access contains old field, disturbed, and wooded swamp areas, the latter occurring along the river. The majority of area for the proposed Mall Drive would traverse old field communities and developed areas. Proposed transportation modified areas are relatively small, covering approximately 1.2 acres of wetland and 4.5 acres of upland type vegetation, 5.7 acres in total.

2.0 WILDLIFE

2.1 Mall Site

Suitable habitat for a typical variety of wildlife species is provided by onsite vegetative communities. During a period of one year, approximately 20 person-days were spent in the field where a total of 65 wildlife species were observed: 7 species of mammals, 50 species of birds, 3 species of reptiles, and 5 species of amphibians (Attachment B, Appendix B). Some of these species find all of their food, water, cover, and breeding areas on the site; other species use the area to fulfill only some of these needs. Due to lack of aquatic vegetation around onsite ponds and excessive water depth, the site provides only marginal habitat for waterfowl.

Three individuals of uncommon species (Craig, 1979)--the great blue heron, the osprey, and the common (Wilson's) snipe--were observed during field observations. However, there was only one sighting for each and no nests were observed; therefore, it is believed that they are transient in the project area.

2.2 Transportation Modified Areas

These areas also provide suitable habitat for a variety of wildlife. However, a number of species that are evident on the project site, primarily those dependent upon open water and shore areas for resting, breeding, or as a food source, are not likely to occur in these areas.

3.0 ENDANGERED AND THREATENED SPECIES

The U.S. Fish and Wildlife Service (FWS) has developed an official list of endangered or threatened species in Connecticut; no plant species have been included. No other list has been developed by the State. Of the 17 wildlife species considered endangered or threatened by the FWS, none were recorded on the project site, nor is it likely any will be in the future since there is no suitable habitat in the vicinity. According to a study by the New England Botanical Club (Mehrhoff, 1978), several Connecticut plant species are considered rare. None of these were found on the site.

4.0 EVALUATION OF SITE WETLANDS

All wetlands play some role in food chain production or offer some suitable wildlife habitat for nesting, spawning, rearing, and/or resting. Field investigations showed a low level of these activities as evidenced by a nesting flicker in the wooded swamp, northern water snakes mating in the marsh, and spawning alewives and carp in the shallower pond areas. The site's wetlands are of limited value to waterfowl because of sparse vegetation and because the ponds are too deep and their side slopes to steep to promote growth of aquatic vegetation for feeding.

What criteria determines low

Wetlands may also play a role in natural drainage and sedimentation and in flushing of water bodies: they may serve as storage areas for storm and floodwaters, may act as prime natural recharge areas, and may purify water through natural filtration processes.

The site's wetlands do not play a significant role in the area's overall drainage patterns because upland drainage is diverted through the site via the DOT channel and does not pass through the majority of wetlands. Therefore, they do not effectively contribute to control of sedimentation or flushing action, store storm water, or purify water through filtration. In addition, the ground water recharge potential of the site's wetlands is limited due to the relatively slow rate at which water passes through the soils in these areas and the presence of thick clay deposits beneath some of them. As a result, it is unlikely that precipitation over the wetlands would have the entry location, pathway, or sufficient time to supply ground water reserves before the river's influence would carry runoff downstream.

The site's ability to store floodwaters has been shown to have no measurable impact upon flood levels in the Quinnipiac River because of the small storage capacity of the site in comparison to the river's total storage and storm volumes experienced (Section C.3). Since wetlands comprise a smaller area (35 percent) than the full site, their contribution to storing floodwaters would be proportionately less and practicably immeasurable on their own since they are fragmented over the site. Wetlands on the proposed site have little positive effect for storing a significant amount of floodwater to measurably influence flooding along the Quinnipiac River.

Again a matter of degree, What they are saying is that they cannot determ. or measure the impac. How then can they determi. or conclude that it woul be insignifica

4.1 State and Local Policies

In accordance with State law, North Haven has adopted ordinances empowering it to implement and administer the Inland Wetlands and Water Courses Regulations for the town. Late in 1978, the North Haven Inland Wetlands Commission granted conditional approval for the construction of the proposed mall. Specific conditions to be met include the maintenance of at least a 75-foot buffer area along the Quinnipiac River and the nondisturbance of at least 11.6 acres of inland wetlands outside the channel encroachment line. These conditions would be met by the proposed development, and a performance bond of $1,000,000 is being required by the town to enforce compliance.

C. SURFACE WATER RESOURCES AND WATER QUALITY

1.0 WATER QUALITY

Water quality in the Quinnipiac River has been affected by the large population and commercial/industrial activities located in the drainage area. The river has been classified "C" by the Connecticut Department of Environmental Protection (DEP) from Southington to the tidewater. Class C

After the enactment of Conn. Clean Water Act it was scheduled for improvement to Class B. This was supposed to have been accomplished by 1975, however it has since been repeatedly postponed.

One of the goals of the Quinnipiac River Watershed Assoc. is to see the river improved to Class B (swimable, fishable)

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waters are defined as having good aesthetic value and being suitable for fish and wildlife habitat, recreational boating, and certain industrial processes, including cooling.

A number of towns discharge treated sewage into the river, including Southington, Cheshire, Meriden, Wallingford, and North Haven. Also, 25 industrial facilities discharge a total of 10.7 million gallons per day of treated industrial wastewater. There are also storm water discharges into the river from urban, commercial, and industrial development.

this is for Class C not B

Recent samplings show that the Quinnipiac River meets the criteria contained in the water quality standards except for dissolved oxygen during the late summer and for coliform during the winter months, when sewage treatment plants are not required to disinfect their discharges. Ponds on the site were found to have water quality similar to that of the Quinnipiac River. Generally, suspended solids were higher in the ponds than in the river, while dissolved materials were lower. The ponds do not serve, nor have they been proposed to serve, as a drinking water supply. Water quality samples from the Quinnipiac during storm conditions indicate significant increases in constituents (oil and grease, lead, zinc, copper and other metals) associated with urban runoff.

what about recharge area for underlying aquifer area

where is the ~~underlying~~ major recharge area for the aquifer area that underlies the Quinnipiac from Meriden to New Haven

what about reestablishment of Shad in the Quinnipiac! this cannot be done if it isn't cleaner than it is now,

2.0 BIOLOGICAL CONDITIONS

A recent DEP monitoring program found that the benthic (bottom) species in the river are those tolerant to polluted conditions. Other recent samplings of the river, and the proposed mall site's surface waters, confirmed these conditions. Several common species of warm water fish inhabit the ponds and anadromous fish presumably use these ponds for spawning purposes. During the EIS scoping meetings, concerns were expressed over locating shellfish resources that could possibly be affected downstream of the site in New Haven. In this area toward the mouth of the Quinnipiac River, approximately 6-8 miles downstream of the proposed site, aquatic biological conditions are characteristic of those in an urban estuarine environment. DEP monitoring has revealed that the aquatic species present were those characteristically insensitive to pollution, and that a large population of soft-shelled clams and an oyster seed crop was present. The Connecticut Department of Agriculture has located this shellfish area to be between Grand Avenue and Middleton Avenue in New Haven (Baker, State Department of Agriculture, 1981).

What about the rest of the harbor? It is all connected.

3.0 HYDROLOGY AND HYDRAULICS

Flooding along the Quinnipiac River in the town of North Haven was studied in March of 1980 by C.E. Maguire Inc., for the Flood Insurance Administration of the U.S. Department of Housing and Urban Development (now the Federal Emergency Management Agency). The study was performed to delineate a fringe flood plain (that area between the channel encroachment line and the 100-year flood line which can generally be developed without significant flooding impacts). Calculations based on this study and on

Flood plains should not be developed period, this is essentially part of the River and when developed is always a problem sooner or later. When are we going to learn.

391

Please calculate from FEMA maps exact acreage

error here - photos STM/CCA submitted to Corps show 5 of flood showed Adle also 3/17

detailed topographic information show that half of the site would be covered by 3 feet of water during extreme (100-year) floods, with correspondingly shallower flooding during more frequent events. During the 6-month and 1-year flood events, for example, the site does not flood.

What about Upper State St. Corps has letters complaining about flooding

As a result of comments made at scoping meetings, a survey was conducted of homes and businesses along State Street, which was indicated as the area most affected by Quinnipiac River flooding. The surveys findings suggest that some homes do experience more severe floods than those predicted in the 1980 study, which had used generalized topographic data. Figure 10 identifies the location of flood-prone properties along State Street. Other areas of flooding reported to the town are local conditions caused by deficient drainage facilities, particularly inadequate culverts.

If flooding worsens after Mall or any other development along Quinnipiac River all responsible should be liable for damages.

D. TRANSPORTATION

1.0 DEFINITION OF STUDY AREAS

The following three transportation impact study areas were identified (Figure 11):

The Market Area - encompassing the towns and regions to be served by the proposed mall; used to determine changes in regional travel patterns as a result of mall operations;

The Macroanalysis Area - having roughly the same boundaries as the town of North Haven; used to examine potential community impacts due to mall-oriented traffic; and

The Microanalysis Area - including the area bounded by the routes immediately adjacent to the proposed mall (Washington Avenue, Route 22, and the Wilbur Cross Parkway), as well as all other routes with substantial amounts of mall-related traffic; utilized to conduct detailed air and noise quality analyses.

2.0 MALL ACCESS ROUTES

I-91 and the Wilbur Cross Parkway would carry most of the mall-related traffic. Further mall access would be provided by several State routes and local roads (Figure 12). With the exception of segments of Washington Avenue, Clintonville Road, and Bishop Street, none of these routes currently experience severe traffic flow problems.

wrong word indicates 3 or 4 only

Name all streets + route in text pleas

3.0 1985 TRAFFIC CONDITIONS WITHOUT THE MALL

Traffic volume data collected from the Connecticut Department of Transportation (DOT), the South Central Connecticut Regional Planning Agency (RPA), and the town of North Haven were supplemented by special surveys. Data were compiled to yield information on all-day (24-hour),

East-West traffic must be spoken to here. Cloudland Beach, Warner Rd, Arrowdale Rd Rimmon, Patten, Spring, Laydon Maple, Montowese must all be mentioned AND mor.

peak 8-hour, peak-hour, and hour-by-hour 1980 traffic volumes. In order to project baseline traffic volumes for 1985, regional traffic flows were increased at a rate of 1.0 percent per year. The year 1985 was used as the "design year" when the North Haven Mall could achieve full operations and generate maximum traffic flows.

BIAS: this unquestioningly adopts DOT and Town's position, as indicated in SUMMARY, above.

Presently, there are two non-mall-related, federally assisted highway projects in the macroanalysis area. The first is Washington Avenue, which is being widened and improved from Broadway to its intersection with I-91 at Exit 12. The second is Bishop Street between State Street and Hartford Turnpike, where the existing two-lane facility is proposed for widening to a four-lane facility. Both projects are expected to be completed before the mall is scheduled to open. INACCURATE (especially if reflecting Appendix H p. 69 predicting start of construction Spring 1981 !!

Since today's 1981 traffic volumes would not accurately reflect future traffic around the proposed site, a prediction was made of the "no-mall" 1985 conditions. This 1985 traffic prediction serves as the baseline "existing condition" from which traffic-related impacts are considered. It was found that the traffic capacities of existing access roads and those proposed for modification would be adequate for the projected no-mall 1985 traffic volumes during peak hours. Current congestion problems on Washington Avenue, Clintonville Road, and Bishop Street would be relieved by the highway project improvements. Levels of service on the proposed mall access routes and intersections appear in Tables 6 and 7.

ASSUMES improvements will accommodate Mall traffic when due to litigation it is not clear that improvements will be allowed.

4.0 PUBLIC TRANSPORTATION

Currently there is only one public transit route passing within walking distance of the proposed mall (Connecticut Transit Bus Route C linking Wallingford and New Haven via North Haven). This route provides limited weekday service (eight round trips) and no weekend service as scheduling is principally aligned with train schedules and commuter riders between Wallingford and New Haven. Presently, this route services Washington Avenue along the proposed mall site and the proposed Mall Drive. Connecticut Transit Bus has indicated there is the potential that buses could be routed to serve the mall directly, as is being done at the Hamden Miracle Mile and the Woolco Plaza. The present route is a "fixed" route, but deviations can be provided, as with stops now being made at the Pratt and Whitney plant and the nearby Blue Cross/Blue Shield offices. It is premature at this stage for routing alignments to be committed by Connecticut Transit, however, such a routing would appear reasonable if funding resources are maintained and schedules aligned.

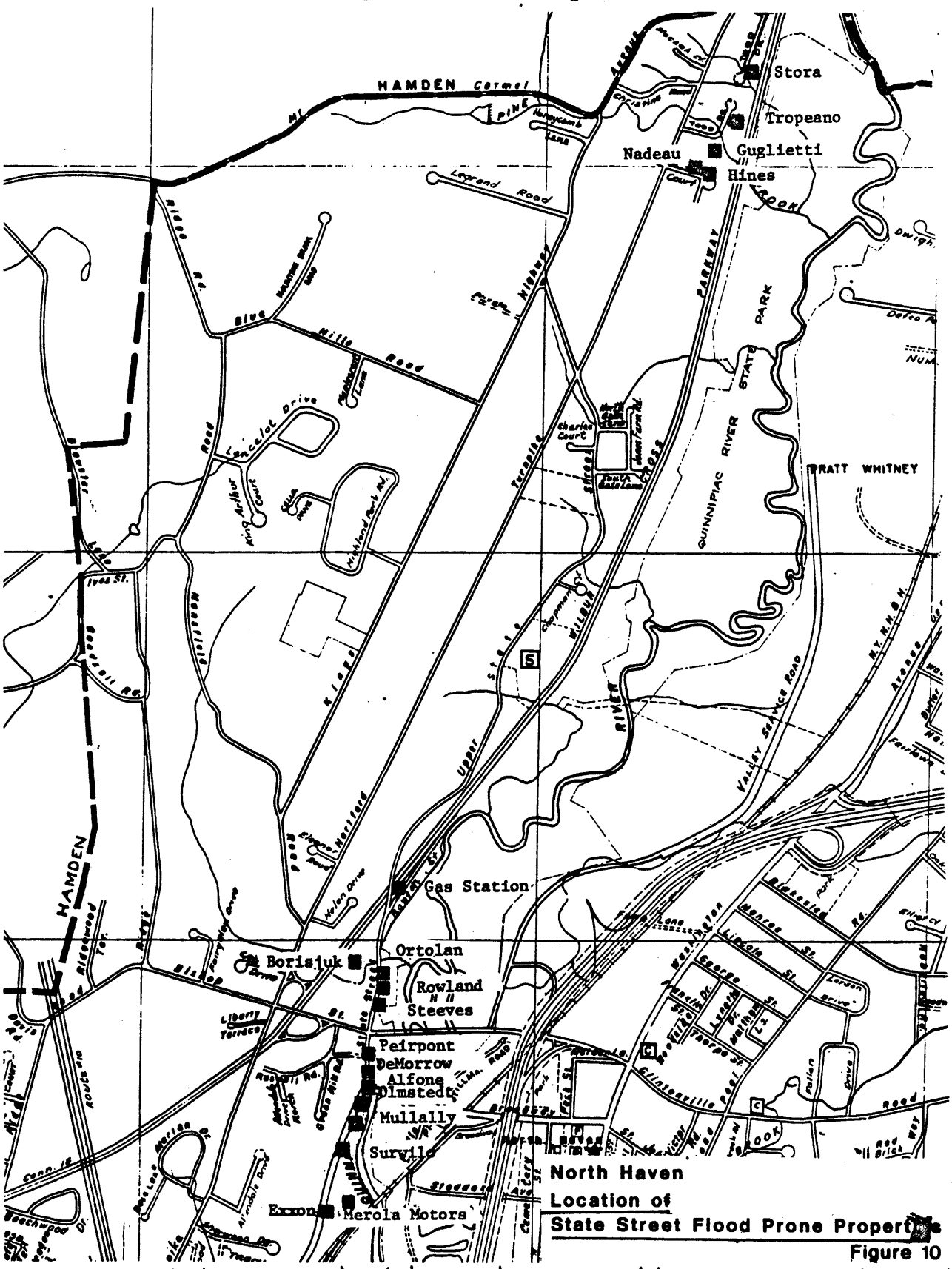
~~To Bob Adler~~

Staple into 593
~~biased~~ copy

III p. 8 Figure 10

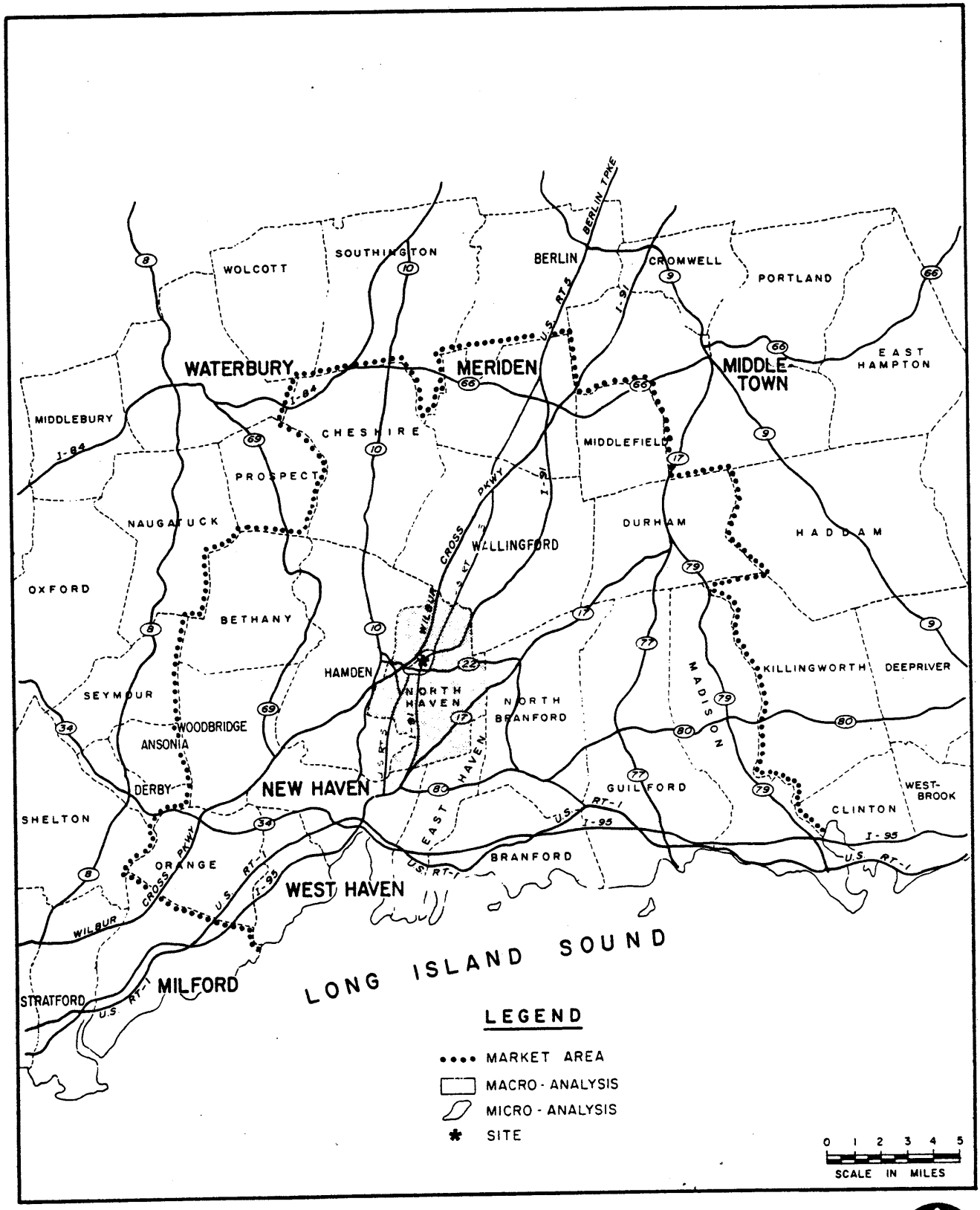
This whole map is biased because it does not show the extent of the flooding. It only shows some houses that flood. The flooding occurs at homes from at least 10 Upper State Street to 92 Upper State St, on the even sides of the street. Land and streets that flood concern us, too. In final EIS please include The Flood Insurance Maps of FEMA, Sept 17, 1980, of the flooding of the Quinnipiac River from Toelles Rd to Sachett Point Rd, East and West from the river. You will find these give a far more complete picture of what truly floods and your comment on flooding should be directed to this information. We are concerned the Wilbur Cross will flood more often. Please include the fact the Wilbur Cross was closed in the Jan 1979 floods, because of flooding.

This comment from McPhedran
21 Central Ave.
North Haven Ct. 06473



Location of
State State Flood Prone Properties
Figure 10

this whole map is biased because it does not show the extent of the flooding, It only shows some houses that flood In final draft, please comment on and include Flood Insurance Maps of FEMA of Sept 17, 1980



NORTH HAVEN MALL

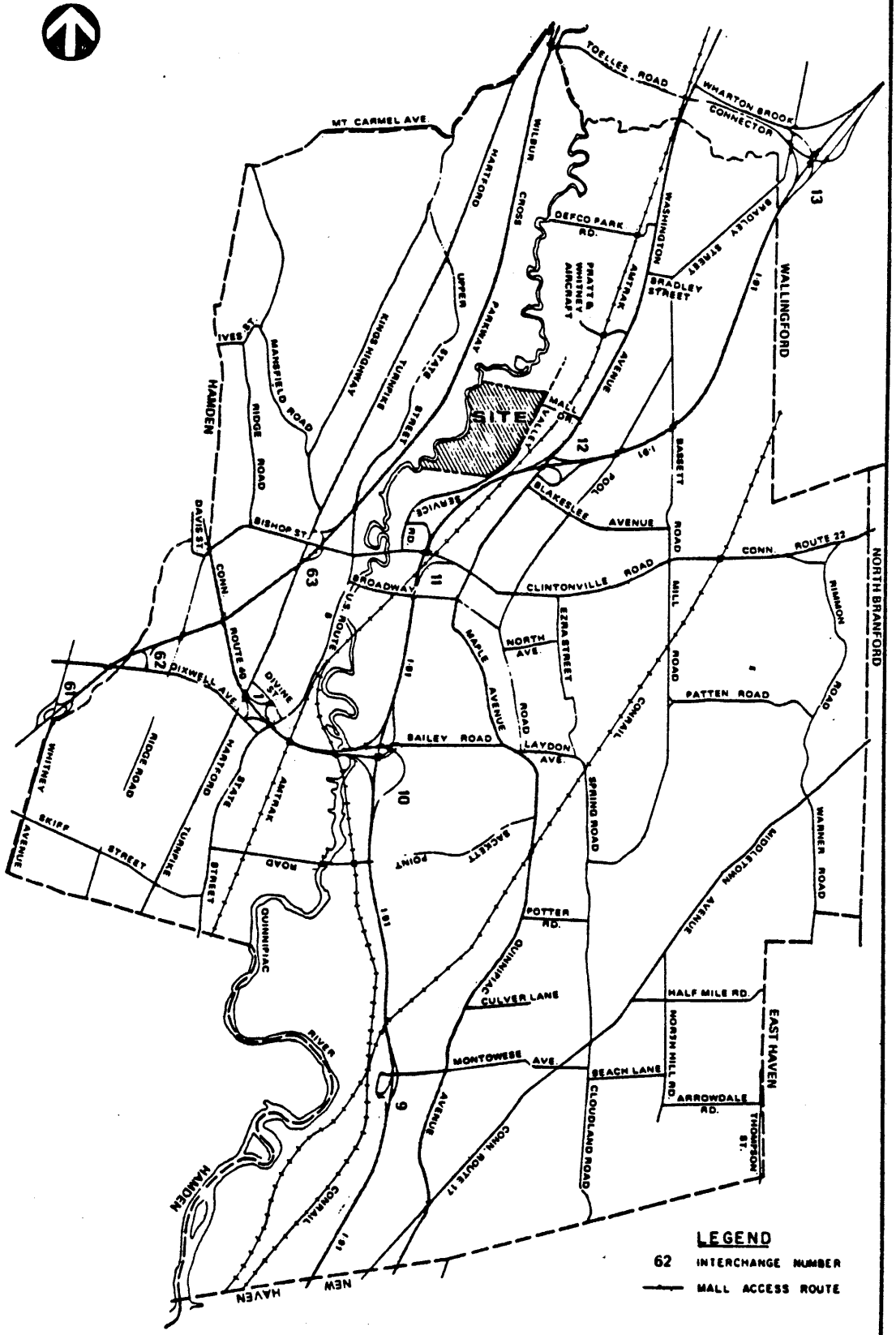
VALLEY SERVICE ROAD

NORTH HAVEN, CONNECTICUT

Transportation Impact Study Areas

Figure 11

Source: Appendix M, Community and Visual Quality



North Haven Mall
Valley Service Road
North Haven, Connecticut
Source: Appendix H, Transportation

Figure 12
Mall Access Routes

TABLE 6
MALL ACCESS ROUTES
LEVEL OF SERVICE
1985 BACKGROUND
(Without Mall)

Location	Daily Traffic	Level of Service*
Major Routes		
I-91 north of Interchange 12	44,500	A
I-91 south of Interchange 11	56,000	C
W.C. Parkway north of Interchange 63	22,400	B
W.C. Parkway south of Interchange 63	27,800	B
Clintonville Road (Route 22) near North Branford Town Line	9,100	B
Clintonville Road (Route 22) west of Bassett Road	8,400	B
Davis Road (Route 22) at Hamden Town Line	4,700	B
Bishop Street (Route 22) west of Hartford Turnpike	4,900	B
Washington Avenue (Route 5) at Wallingford Town Line	12,600	C
Dixwell Avenue (SR 717) west of Ridge Road	14,300	C
State Street (Route 5) at Hamden Town Line	12,800	C
State Street (Route 5) south of Broadway	7,300	C
Quinnipiac Avenue (SR 750) north of Montowese Avenue	8,700	C
Maple Avenue (SR 750) south of Broadway	6,600	C
Secondary Routes		
Pool Road north of Clintonville Road	6,300	C
Blakeslee Avenue west of Bassett Road	3,150	B
Hartford Turnpike south of Mount Carmel Avenue	3,400	B

* Level of service compares volume of traffic to the capacity of the road to handle it. Level of service for roadways is measured on a scale of "A" to "F" representing conditions ranging from free flow to forced traffic flow. Level of service "D," the minimum acceptable level, describes a condition where traffic is approaching unstable flow but maintains generally tolerable operating speeds.

Source: Appendix H, Transportation

TABLE 7
MALL ACCESS INTERSECTIONS
LEVEL OF SERVICE
BACKGROUND
(Without Mall)

Intersection	Day	Peak Period	Level of Service
Washington Avenue - Mall Drive	Sat	3-4 PM	*
Washington Avenue - I-91 Southbound Off and On Ramps	Wkdy	3-4 PM	B
Washington Avenue - I-91 Northbound Off and On Ramps	Wkdy	3-4 PM	C
Washington Avenue - Blakeslee Avenue	Wkdy	3-4 PM	C
Washington Avenue - Clintonville Road	Wkdy	4-5 PM	D
Route 22 - I-91 Northbound Off Ramp	Wkdy	4-5 PM	C
Route 22 - Valley Service Road	Wkdy	4-5 PM	B
Route 22 - State Street	Wkdy	4-5 PM	C
Route 22 - Route 15 Northbound Off and On Ramps	Wkdy	4-5 PM	B
Route 22 - Hartford Turnpike	Wkdy	4-5 PM	C
Hartford Turnpike - Route 15 Southbound Off and On Ramps	Wkdy	4-5 PM	C
Valley Service Road - I-91 Southbound On Ramp	Wkdy	4-5 PM	A
Valley Service Road - South Access Drive	Sat	2-3 PM	*
Valley Service Road - Mid Access Drive	Sat	2-3 PM	*
Valley Service Road - Mall Drive	Sat	2-3 PM	*

* Intersection does not exist.

Source: Appendix H, Transportation

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E. AIR QUALITY

1.0 INTRODUCTION

1.1 Air Pollutants for Analysis

Seven air pollutants have been identified by the U.S. Environmental Protection Agency (EPA) as being of nationwide concern and for which National Ambient Air Quality Standards (NAAQS) have been established for each: carbon monoxide, hydrocarbons, nitrogen oxides, photochemical oxidants, particulate matter, sulfur oxides, and lead.

Of primary importance to the proposed project are those pollutants that can be traced to motor vehicles: carbon monoxide, hydrocarbons, nitrogen oxides, photochemical oxidants, and lead. Carbon monoxide as a site-specific pollutant warrants microscale analysis. Hydrocarbons and nitrogen oxides are reactive pollutants whose impacts usually occur over a wide area and are examined on an areawide basis. Similarly, photochemical oxidants, resulting from complex reactions between hydrocarbons and nitrogen oxides in the presence of sunlight, are limited to a mesoscale area examination of the originating hydrocarbons and nitrogen oxides compounds.

The lead used in gasoline antiknock additives constitutes a major source of lead emissions to the atmosphere. These, however, are expected to decrease as older vehicles are replaced by catalyst-equipped vehicles, which are restricted to use unleaded gasoline. Therefore, ambient lead concentrations will continue to decrease in the future whether or not the North Haven Mall is constructed, bringing lead levels below the NAAQS. Consequently, a detailed analysis ~~of lead was not performed~~.

Now is this included? Check with DEP to see if unleaded gasoline is sufficient to meet NAAQ in future

1.2 Prediction Methodology

Ten prediction sites located in the area that could be most directly affected were selected for the carbon monoxide microscale analysis. These included locations in the vicinity of points of ingress and egress and at locations on major approaches to the proposed mall. At each site, maximum 1-hour and 8-hour carbon monoxide concentrations were calculated. Estimates of motor vehicle-related pollutant emissions of carbon monoxide, hydrocarbons, and nitrogen oxides were prepared for the mesoscale area bounded by Long Island Sound to the south, Cheshire/Meriden to the north, Clinton to the east, and Milford to the west (the primary market area that could be affected by motor vehicle activity associated with the operation of the proposed mall). The analysis included 1980 base year conditions; 1984 no-build conditions; and 1984 build conditions assuming full operation of the North Haven Mall.

These are now inaccurate

These analyses for 1984 are based on 1985 peak 1-hour and 8-hour traffic estimates, even though it would actually take from 3 to 5 years

These are now related, omitted — Recalculate all figures please)

400

for the mall to achieve full operation. Emissions will be reduced in subsequent years through enforcement of the Federal motor vehicle emissions reduction program; therefore, assuming 1984 as the year for analysis with 1985 traffic levels represents the "worst case" condition relative to vehicle emissions and traffic generation. The confluence of several highly unlikely conditions (i.e., peak traffic volumes and "worst case" meteorological conditions) assumed in the analysis during the first year of mall operation are not likely and make the analysis more conservative.

1.2.1 Microscale Analysis for Carbon Monoxide

Microscale carbon monoxide concentrations were predicted for current (1980) and future (1984) years using procedures given in "Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9 (Revised): Evaluating Indirect Sources" (EPA-450/4-78-001). Background concentrations for the study were obtained from representative monitoring data from a previous carbon monoxide monitoring study (Air Quality Study I-691, Cheshire-Southington, DOT, August 1977) in the Air Quality Control Region (AQCR). Based on this monitoring data, a conservative background value of one part per million (ppm) of carbon monoxide was used for all 1-hour and 8-hour predictions.

The local contributions consist of carbon monoxide emissions from all traffic along nearby roadways and approaches to the proposed mall and emissions from motor vehicle activity within the mall's parking facilities. These values were obtained by application of the EPA-developed HIWAY-2 model (Report No. EPA-600/8-80-018, May 1980).

1.2.2 Pollutant Burdens

Pollutant burdens, the total expected quantities of pollutants for a region, indicate general changes in air quality, and are particularly useful for assessing relative changes in concentrations of reactive air pollutants (hydrocarbons and nitrogen oxides) and resultant concentrations of photochemical oxidants. Mobile source pollutant burdens were computed based on estimated vehicle miles traveled (VMT), average speed, and per-mile emissions of air pollutants. Emission estimates were obtained using the EPA-developed MOBILE 1 computer program and assumed implementation of the Connecticut State Inspection and Maintenance (I&M) Program.

2.0 CARBON MONOXIDE LEVELS AND POLLUTANT BURDENS WITHOUT MALL

Estimates of existing 1980 and of projected 1984 peak 1-hour and 8-hour carbon monoxide concentrations were obtained for the 10 "worst-case" prediction sites (Table 8) with no violations of the 1-hour carbon monoxide standard. The 8-hour carbon monoxide standard was, however, exceeded at the intersection of Washington Avenue and Clintonville Road for 1980--a CO "hotspot" where roadway improvements are anticipated.

TABLE 8
CO ESTIMATES FOR MICROSCALE ANALYSIS AREA
(Without Mall)

Site Location	Estimated CO Concentrations (ppm) 1980 1-Hr.	1980 8-Hr.	1984 1-Hr.	1984 8-Hr.
NW Corner, Bishop & Hartford Turnpike	22.2	8.3	11.9	4.2
Bishop St. across from Wilbur Cross Parkway	17.0	6.9	6.2	2.8
SW Corner, Bishop & State Streets	24.9	7.4	7.7	3.4
Playing Field, E of I-91 Exit	9.0	3.5	5.0	2.4
NE Corner, Washington Avenue & Clintonville Road	22.7	10.7	12.2	6.0
Washington Avenue bet. Blakeslee & I-91	11.4	4.6	5.5	2.6
Ball Field, S. of I-91 Ramp	9.6	3.8	4.7	2.3
Washington Avenue at Mall Drive	7.6	3.4	3.7	2.3
Service Rd. & Mall Drive	-	-	-	-
Service Road & Pk. Lt. Circumferential Rd.	-	-	-	-

Note: 1-hour CO National Ambient Air Quality Standard 35 p.p.m.
8-hour CO National Ambient Air Quality Standard 9 p.p.m.

Source: Appendix I, Air Quality

Estimates of existing carbon monoxide, hydrocarbons, and nitroxide pollutant burdens from mobile sources in the mesocale impact area are shown in Table 9. There are consistent with the emission inventory for the New Haven-Hartford-Springfield AQCR prepared by the DEP.

F. NOISE

1.0 INTRODUCTION

1.1 Noise Descriptors

The maximum 1-hour equivalent sound level ($L_{eq\ (1)}$), the 24-hour equivalent sound level ($L_{eq\ (24)}$), and the day-night level (L_{dn}) are the most commonly accepted noise descriptors used in noise impact evaluation. Maximum 1-hour equivalent sound levels are used to provide an indication of highest expected sound levels from a particular noise source. The $L_{eq(24)}$ and L_{dn} sound levels permit direct comparison against noise levels identified by the EPA.

1.2 Noise Criteria

While there are presently no applicable Federal or State community noise standards, the Noise Control Act of 1972 directed the Administrator of EPA to "...develop and publish criteria with respect to noise;...publish information on the levels of environmental noise the attainment and maintenance of which in defined areas under various conditions are requisite to protect the public health and welfare with an adequate margin of safety." The resultant noise levels, published in March of 1974, are set forth in Table 10. These levels do not constitute enforceable standards, but are useful criteria for evaluating the effect of project noise on public health and welfare. Further details on the human perception and community response to changes in noise levels are contained in Appendix J, Noise.

1.3 Prediction Methodology

The sound level at a given receptor depends primarily on the site geometry of the receptor location and the traffic flow past the site. The Federal Highway Administration (FHWA) Level 2 Highway Traffic Noise Prediction Model was used to estimate both present and future traffic-related noise levels. Predictions of current noise levels were checked in the field.

2.0 EXISTING AND PROJECTED BASELINE CONDITIONS

2.1 Existing Noise Levels

The noise impact analysis concentrated on predicting the noise levels generated by vehicular sources, since noise generated in the proposed mall's stores will be well within the normal levels found in offices,

homes or other retail stores. A large number of receptor locations (104) within the town of North Haven were selected for detailed noise analysis. Site selection was based on projected traffic routes to and from the proposed mall, geographical distribution of locations within the area, location of nearby community facilities, and location of nearby residential areas.

According to EPA critics findings show noise level extrimental

Predicted 1980 $L_{eq(24)}$ ranged from 55 to 77 dBA, L_{dn} ranged from 58 to 81 dBA, and $L_{eq(1)}$ varied between 60 and 82 dBA. All receptor locations showed noise levels above the EPA-identified noise levels that would produce annoyance and interference with outdoor activities. At eight sites, predicted noise levels were above the levels identified by EPA as requisite to protect against loss of hearing over a 40-year working life of constant exposure. Each of these sites was immediately adjacent to a heavily traveled roadway. These results are typical of suburban areas in the United States and do not reflect any peculiar characteristics of the town.

2.2 1985 Noise Levels Without the Proposed Mall

Without the proposed mall, predicted 1985 $L_{eq(24)}$ values ranged from 56 to 79 dBA, L_{dn} values ranged from 59 to 84 dBA, and maximum $L_{eq(1)}$ values ranged from 60 to 85 dBA. The predicted 1985 noise levels are slightly higher than the 1980 noise levels and, like the 1980 values, are above the EPA criteria that produce annoyance and interference with outdoor activities.

G. UTILITIES

1.0 WATER SUPPLY

1.1 Supply System

The proposed mall site lies within the South Central Connecticut Water Authority's Reduced Rabbit Rock Service Area, which is served through a pump station and can draw from two standpipes (storage tanks). The pump station in the Rabbit Rock Service Area has a maximum capacity of 9.7 million gallons per day (mgd). The Wintergreen Service Area is also available and has a maximum capacity of 22 mgd. The storage tanks in the Rabbit Rock Service Area and Wintergreen Service Area have capacities of 1 million and 1.5 million gallons, respectively. In 1979, the average water use was approximately 2.6 mgd, and 2.2 mgd in 1980, with a maximum daily use of 2.9-3.0 mgd for both years.

Measurements of static pressure in the service area, at hydrants located on Washington Avenue and at the intersection of Broadway and Elm Street (85 and 95 psi, respectively), indicated that pressure in the system is adequate for water supply needs.

TABLE 9

CO, HC, NO_x POLLUTANT BURDEN ESTIMATES

(Without Mall)

Case	Pollutant Burdens (Tons.Yr.)		
	CO	HC	NOx
1980	119,938	13,928	12,279
1984	78,827	8,363	10,703

Source: Appendix I, Air Quality

TABLE 10
NOISE LEVELS IDENTIFIED TO PROTECT
PUBLIC HEALTH AND WELFARE

EFFECT	LEVEL	AREA
Hearing Loss	$L_{eq(24)} \leq 70$ dB	All Areas
Outdoor activity interference and annoyance	$L_{dn} \leq 55$ dB	Outdoors in residential areas and farms and other outdoor areas where people spend widely varying amounts of time and other places in which quiet is a basis for use.
	$L_{eq(24)} \leq 55$ dB	Outdoor areas where people spend limited amounts of time, such as school yards, playgrounds, etc.
Indoor activity interference and annoyance	$L_{dn} \leq 45$ dB	Indoor residential areas
	$L_{eq(24)} \leq 45$ dB	Other indoor areas with human activities such as schools, etc.

Source: Report No. EPA-550/9-74-004, March 1974

1.2 Fire Protection

Fire flow tests were performed at the hydrants mentioned above. At flows of 1,750 and 2,120 gpm, residual pressures of 41 psi and 75 psi, respectively, were recorded and are adequate for fire protection.

1.3 System Improvements

Because of reliance upon a pumping system to provide water to the Reduced Rabbit Rock Service Area, the water company has proposed connecting the Reduced Rabbit Rock Service Area to the New Haven Low Service Area, eliminating this dependence and providing reliable gravity feed to the system. This improvement would add three additional supply sources. Included are the sources from the West River, Lake Whitney and Lake Gaillard with safe yields of 10.4 mgd, 7.0 mgd and 35 mgd, respectively, and storage of 2.6 billion gallons, 0.26 billion gallons and 14.3 billion gallons, respectively.

2.0 SANITARY SEWER FACILITIES

2.1 Sewage

Sanitary sewage is collected in seven sewer service areas, not all of which have been completed. To date, some 65 percent of the town is served by sewers, and the rest is served by individual onsite disposal facilities such as septic tanks. The town is currently under orders from the Connecticut DEP to construct sewers in Section III and VI. The proposed mall site is located in Section VI. No funds for construction have been allocated since the project's DEP priority ranking is low.

2.2 Sewage Treatment

Sanitary sewage in the town of North Haven is treated prior to discharge into the Quinnipiac River. The town treatment plant, which has a design average flow capacity of 4.5 mgd, currently receives about 1.7 mgd. Treatment at the plant presently exceeds some of its discharge permit limits. It does meet permit limits for total pollutant discharge because of a low flow compared to the design flow of the plant.

In 1979, a facilities plan was prepared which recommended upgrading the treatment process. An application for funding was filed with the DEP and EPA. Funding is not anticipated until 1986, with start up of the upgraded plant in late 1988 to early 1989.

How does the Mall Properties Plan to deal with sewage until sewers are complete

3.0 SOLID WASTE COLLECTION AND DISPOSAL

All commercial and industrial waste in North Haven is collected by private carters. The rate of disposal is 24,000 to 26,000 tons per year at the town sanitary landfill. It is estimated that this landfill will be filled in 1982. North Haven has applied, and been approved by the

Connecticut DEP, for a permit to expand their landfill, which would extend the landfill's useful life 2 to 3 years, or approximately until 1985.

Current State law does not permit solid waste from one town to be randomly disposed in another town's waste facility. In Connecticut, the towns are responsible for the disposal of all wastes generated within their borders. As a result, North Haven is studying alternatives for solid waste disposal, including a new landfill, approval for use of the New Haven transfer station to transport solid waste to landfills outside of the town, and participation in the Connecticut Resource Recovery Authority's project for south central Connecticut. The town feels this latter alternative is a most likely long-term solution for solid waste disposal (Gillen, North Haven DPW, Sept. 23, 1981).

4.0 ELECTRICAL SUPPLY AND DISTRIBUTION

4.1 Supply

Electricity is supplied to North Haven by United Illuminating (UI), which generates a total of 1,229,260 kw from five generating stations. The company is a member of the New England Power Pool, which makes additional power available as needed. Current 1979 and 1980 peak demand on the system was 911,300 kw and 971,000 kw, respectively.

Membership in the New England Power Pool (NEPOOL) provides UI with an integrated power network. NEPOOL has a central distribution center that monitors the network for supply and demand. It channels power to those units needing it from other regional power plants not operating near capacity, and it channels power first from units using cheaper generating sources. As such, UI's capability for delivering power extends beyond its own historical generation and restrictions of "reserve capacity." As a point of reference, however, peak demands on UI's generating capacity would indicate that UI had a theoretical reserved capacity of 29.9 percent and 25 percent for 1979 and 1980, respectively.

4.2 Distribution to Site

Electrical service to the proposed mall site would be by high-voltage overhead cable from the railroad right-of-way just east of Valley Service Road. This cable would be brought overhead to Valley Service Road, and connected via underground cable to a main switchgear on the site. High voltage cable would be run underground around the mall to eight transformers.

5.0 TELEPHONE SERVICE

Telephone service in North Haven is provided by Southern New England Telephone. Service to the site would be brought in from Washington Avenue via underground cable along the proposed Mall Drive and Valley Service Road to conduits on the site for distribution throughout the mall.

H. ECONOMICS AND LAND USE

1.0 BACKGROUND ECONOMIC INFORMATION

1.1 Population Trends

Between 1960 and 1970, population in the New Haven-West Haven Standard Metropolitan Statistical Area (SMSA) increased from 359,400 to 411,300, an average annual increase of 1.4 percent compared to the State's 2.0 percent. While the growth rate in the SMSA has slowed after 1970 to about 0.3 percent annually, projections indicate it will likely increase through 1990. The growth rate for the following decade is expected to increase to 0.7 percent annually, for a total population in the year 2000 of 451,300.

These population increases were not distributed equally throughout the SMSA. The city of New Haven lost population over the last 20 years. Between 1960 and 1970, it declined from 152,000 to 137,700, an average annual decline of 0.9 percent. Current population is estimated at about 130,000. Further decreases are expected through 1985, when population is projected to be 128,000. A reversal in these trends is then anticipated and population is expected to reach 135,000 by the year 2000.

While the city of New Haven was experiencing population losses, suburban population was increasing at a rate of 3.2 percent annually between 1960 and 1980. It continued to increase during the 1970s, although at a slower rate of about 0.8 percent annually. At present, 70 percent of the total SMSA population, 296,100 persons, resides in places outside the city of New Haven.

The suburban increases are expected to continue annually through 1990 when suburban population is projected to be 306,100. Over the following decade the suburban growth rate is projected at 2,200 persons per year.

1.2 Employment Trends

Employment trends show that between 1972 and 1975 the New Haven Labor Market Area lost slightly more than 1,100 jobs annually, a decline of 0.7 percent per year. The largest decreases were in the construction and manufacturing sectors, while employment gains of 1 to 2 percent annually were registered in the services and finance sectors.

Since 1975, there have been significant increases in employment. An average of 4,567 jobs were added annually between 1975 and 1979 for a yearly increase of 2.7 percent. The largest employment gains were in the wholesale and retail trades, finance, services, and government sectors. Employment projections prepared by the DOT indicate that employment will increase by about 1,800 jobs per year through 1990, the greatest increases to occur in the trade and services sectors.

Recent figures show unemployment rates for the New Haven Labor Market at 6.5 percent and for the State at 6.0 percent. Unemployment among New Haven residents has typically been higher than in the Labor Market Area as a whole. Figures for September 1981 show unemployment for the city at 8.0 percent, down from a high of 11.7 percent in 1976. In general, suburban residents have experienced a much lower rate of unemployment (North Haven 5.8, Hamden 5.9, and Wallingford 6.6 percent).

1.3 Income Trends

Per capita income for the SMSA has generally been lower than for the State, but higher than for the Southern New England region. This is attributable primarily to the lower per capita income figures reported for the city of New Haven. As an example, in 1977 New Haven per capita income was estimated at $5,249 compared to $6,100 for the SMSA (constant 1977 dollars). In the same year, per capita income for the suburban areas in the SMSA was estimated at $6,493.

Growth in per capita income (in constant 1977 dollars) was negatively affected by the temporary downturn in the national economy in 1975. There was a considerable loss of jobs in the New Haven Labor Market Area and per capita income, reported to be $6,269 in 1972, fell to about $5,990 in 1975.

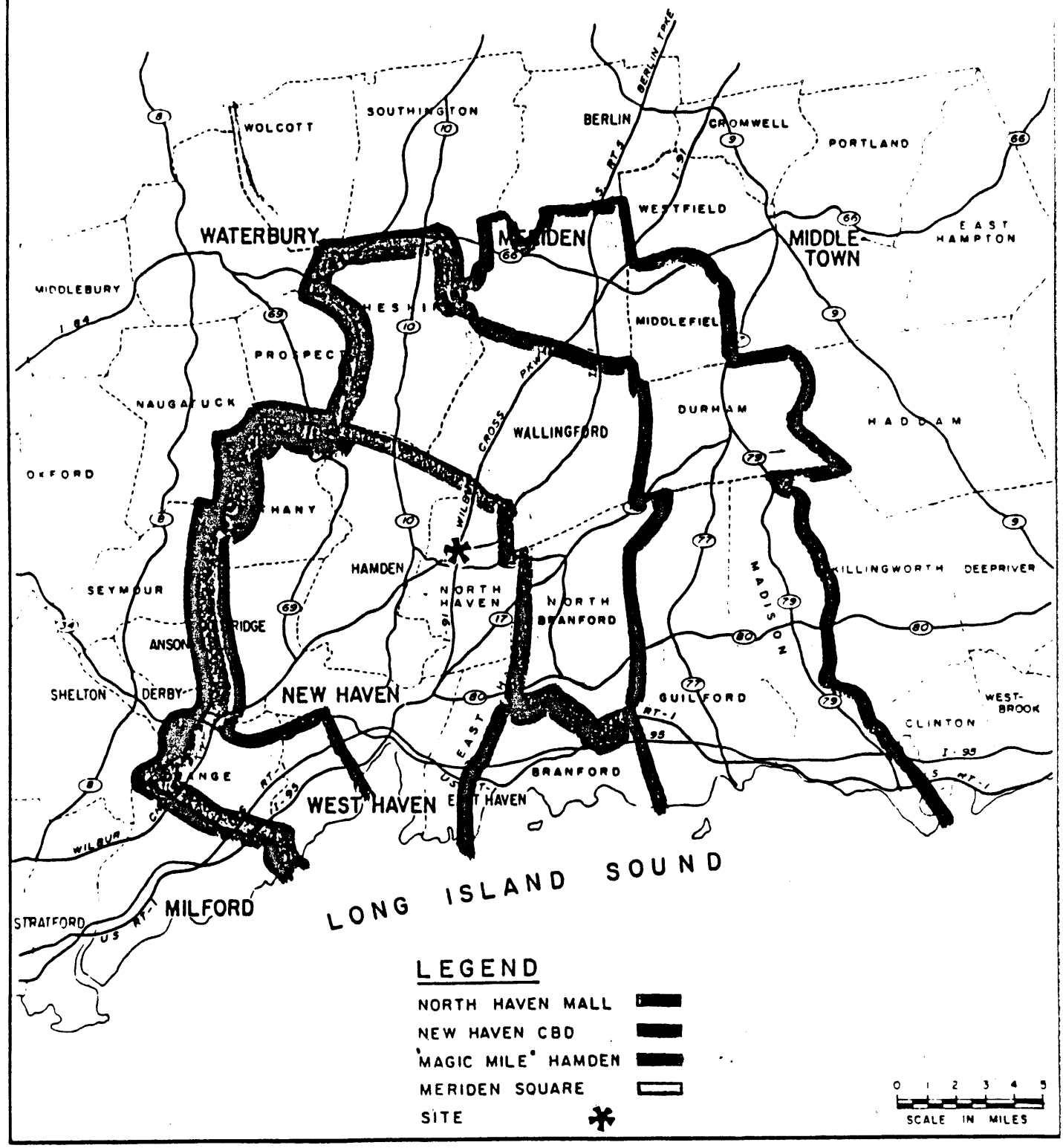
In light of substantial increases in employment in the New Haven Labor Market Area recently and the continued strengthening of the SMSA economy, it is anticipated that real per capita income in the New Haven SMSA will increase over the next several years. For the retail analysis, increases in per capita income through 1990 have been estimated at a range of 0 to 1 percent annually.

2.0 RETAIL MARKET TRENDS

2.1 Trade Areas

The North Haven Mall market area covers the SMSA towns of North Haven, New Haven, Hamden, Wallingford, North Branford, East Haven, West Haven, Orange, Bethany, Woodbridge, Branford, Guilford, and Madison, as well as the towns of Durham, Middlefield, Meriden, and Cheshire outside of the SMSA. Trade area penetration for the proposed North Haven Mall, New Haven's Central Business District, and Hamden's Magic Mile is substantially different (Figure 13).

As described in Appendix L, downtown New Haven has increasingly lost ground to other metropolitan retailing areas, with its primary trade area becoming increasingly constricted and focusing largely on the city itself, with some extension into close-in suburban towns. Hamden, by contrast, serves a substantial portion of the metropolitan area's northern suburban tier and has gained considerable penetration into New Haven's trade area.



NORTH HAVEN MALL

VALLEY SERVICE ROAD

NORTH HAVEN, CONNECTICUT

TRADE AREAS OF SELECTED RETAIL CENTERS

Source: Appendix L, Economics and Land Use

Figure 13

WRONG: Many Magic Mile stores are not discount department stores. Where did you get your information? Gladstone, by chance? 411

This constriction of downtown New Haven's primary trade area has occurred in relation to changes in situations for some major retail department stores. The opening of branches in the primary trade area has diminished the attraction of the original downtown ("flagship") stores, making them coequal with the other branches. This has tended to constrict or localize the trade area about each downtown store rather than pulling consumers from greater distances. Hamden's Magic Mile, by contrast, consists largely of discount department stores whose retail offering is different from that in a regional mall's full-line department stores with complementary shops. In this regard, Hamden serves an important segment of the marketplace, but does not serve the same retail consumer need which is the target of the proposed mall project.

Hamden has Sear Is it real considered a discount Dept. Store

2.2 Retail Sales and Supply Trends

2.2.1 Historical Retail Market Patterns*

In order to evaluate retail trends in the North Haven market area and estimate the impacts of the proposed North Haven Mall, a market analysis was conducted. This analysis, which utilized data from governmental sources, shoppers surveys and Connecticut DOT trip generation data, focused on the magnitudes of shoppers goods** sales flows into and out of the metropolitan area, including the following:

- Sales outflows, representing consumer expenditures by area residents spent at locations outside the market area;
- Untapped inflow potentials, or consumer expenditures of individuals outside the metropolitan area that could be attracted into the North Haven market;
- Sales inflows, accounting for consumer expenditures on the part of nonmetropolitan area residents which are registered as sales by metropolitan area establishments; and
- Sales retentions representing consumer expenditures by area residents which are reported as sales by metropolitan area establishments.

These critical components were measured through an analysis that traced sales and expenditure levels for 19 individual municipalities and 20 major retail centers both inside and outside the metropolitan area, forming a sales flow matrix with 380 data cells.

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* All retail sales figures are expressed in 1977 constant dollars and have been adjusted to eliminate incompatibilities in reporting of sales taxes.

** Shoppers goods include apparel, household furnishings and other department store-type merchandise.

Shoppers goods volumes remained virtually level for the metropolitan area between 1972 and 1977. But this relatively flat performance masked substantial differences between key centers. Downtown New Haven shoppers goods sales, for example, were off an average 3.1 percent per year for five years ($99.4 million in 1972 to $83.9 million in 1977). Hamden's Magic Mile experienced a slight decline in sales as well (off 0.1 percent from $55.5 million to $55.2 million), while the balance of metropolitan retail centers--many of them located in suburban communities--picked up the slack from downtown New Haven with an average annual increase of 1.2 percent ($222.4 million to $235.7 million).

In 1977, approximately $95 million of shoppers goods sales came into the SMSA from outside areas. This volume of sales was substantially offset by $66.4 million of sales carried out of the SMSA by metropolitan area residents shopping at retail outlets outside the area. The outflow represents approximately 19 percent of the total purchasing power in the region now being spent outside of it.

2.2.2 Supply Changes

During the 1972-1977 period the metropolitan area floor space inventory remained relatively constant. About half of the 400,000 square feet of new retail space that came on line during the mid-1970s was devoted to shoppers goods, primarily in the form of discount department stores which anchored community shopping centers.

2.2.3 Department Store Strategy

Despite relatively constant sales trends for the metropolitan New Haven area, major department stores consider the opening of new branches as meeting corporate locational strategies for the 1980s. Corporate analysts view the metropolitan area as capable of supporting two stores that are properly located. It is likely that the locational choices made by these retail organizations reflects the growth of population in suburban areas of the SMSA. According to the commitments of the anchor stores, new branches at the proposed New Haven Mall represent a strategic move for each of the proposed anchor stores (J.C. Penney, June 26, 1981; R.H. Macy Property, June 19, 1981; Sears, Oct. 22, 1981; May Dept. Stores, G. Fox Division, Oct. 23, 1981).

misprint friends.

2.2.4 Metropolitan Shoppers Goods Sales Outlook

Under a baseline condition, which assumes that the inventory of shoppers goods floor space will remain constant, metropolitan shoppers goods sales by 1990 would range between $368.3 million (under a conservative "no growth" assumption for per capita real income) and $408.3 million (under a "1 percent per annum" growth in real per capita income). Sales outflows would increase from $66.4 million in 1977 to $70.4 million in 1990 under a "no income growth" scenario and to $80.2 million under a "1 percent income growth" assumption. Estimated shoppers goods sales under

2.0 COMMUNITY FACILITIES

The town's residents and businesses are supported by a variety of community services and facilities which appear adequate to meet their needs. School enrollment has been dropping due to declining birthrates, and is expected to continue to decline. As a result, the town has recently closed two of seven elementary schools and has limited use of the east campus of the high school. There are eight churches and two libraries, and a community activity center.

Most of North Haven's recreational facilities support passive activities, as opposed to areas that support facilities for baseball, football, soccer, tennis, etc. The town probably meets Connecticut's Comprehensive Outdoor Recreation Plan's (1978) general guideline for providing 15 acres of recreation and open space per 1,000 people, since in 1978 it had 12.5 acres/1,000 and this figure did not include playing fields adjacent to schools or subsequent acquisitions (Figure 14).

[This includes mall site (which will no longer be open space) and areas to be secondarily developed]

3.0 COMMUNITY SERVICES

The North Haven Police Department employs 65 people in both full- and part-time capacities. It has 15 patrol cars of which 5 or 6 are on the street on any given day. It is town policy to supply police services to private businesses when requested or needed for special protection, traffic control, etc., and to bill these businesses for services rendered. The Fire Department consists of a full-time headquarters company with a paid staff of 31, and has eight pumpers, two cars, a 100-foot ladder and three volunteer companies.

North Haven does not have any major medical/health facility. The nearest hospitals are those in New Haven and Meriden. When the mall is proposed to be fully operational in 1985, Yale New Haven and St. Raphael in New Haven will be expected to have a total bed capacity of 1,392 (863 and 509, respectively), and the Meridan-Wallingford Hospital would have a 285-bed capacity.

Depending on the severity of a medical emergency in North Haven the situation would first be responded to and assessed by the town's fire department staff, and, if necessary, additional support would be provided by the New Haven Ambulance Service. About 90 percent of emergencies are brought to the New Haven hospitals with emergency/trauma facilities.

4.0 VISUAL QUALITY

The area for the proposed mall is a low-lying site composed of open spaces and vegetative communities that include ponds, wetlands, fields and wooded areas (Table 5; Appendix B, Vegetation, Wildlife and Wetlands; Appendix C, Surface Water Resources and Water Quality). The site is presently vacant except for mobile sand mining equipment on its southern

the baseline condition for the major regional centers in 1990 under a "1 percent income growth" assumption are shown in Table 11.

I. COMMUNITY RESOURCES AND VISUAL QUALITY

1.0 TOWN CHARACTER

North Haven is a suburban town in the greater New Haven area. It is essentially a residential community that has undergone timely changes during its history. It was first settled in 1683 and incorporated in 1786. Principally, it was a small agricultural community of under 4000 people. It did not undergo the heavy development of urban centers during the 1800's industrialization. The agricultural nature of the community was transformed towards its residential makeup with the post-World War II boom. Since the war, the nature of the community has taken on a suburban residential character (almost entirely single-family houses--95 percent) spurred on by access to urban New Haven and Hartford by the Wilbur Cross Parkway and Interstate 91. The town has changed to accommodate its 22,000 population, and is now principally characterized by medium density (approximately 1/4-acre lots) to low density (approximately 1-acre lots) residential areas. It has a well-defined commercial/business strip, centrally located along Washington Avenue, and a commercial/industrial corridor between Washington Avenue and the Quinnipiac River and State Street. This area includes the Pratt and Witney aircraft industrial plant and is the area for the proposed mall. Descriptions of the different sections of the town are contained in Appendix M on Community Impacts and Visual Quality.

Aesthetically, the town has a "well groomed" and "cared for" look. The town's orientation is for a nonurban environment and for separating residential-living areas from business-oriented land uses. This has minimized business traffic, air quality problems, noise, and tall buildings in residential areas, while promoting more open space, parks and a nonurban setting. The town's appearance and operation reflects the energy and commitment of its residents to preserving their nonurban atmosphere; the town has promoted its values for maintaining this character through its Town Plan of Development and zoning regulations. It has elected to control its direction by regulating the density, mix and location of residential and industrial/commercial/ business development (Plan of Development 1966-2000, North Haven, Connecticut; Zoning Regulations of the Town of North Haven, Connecticut).

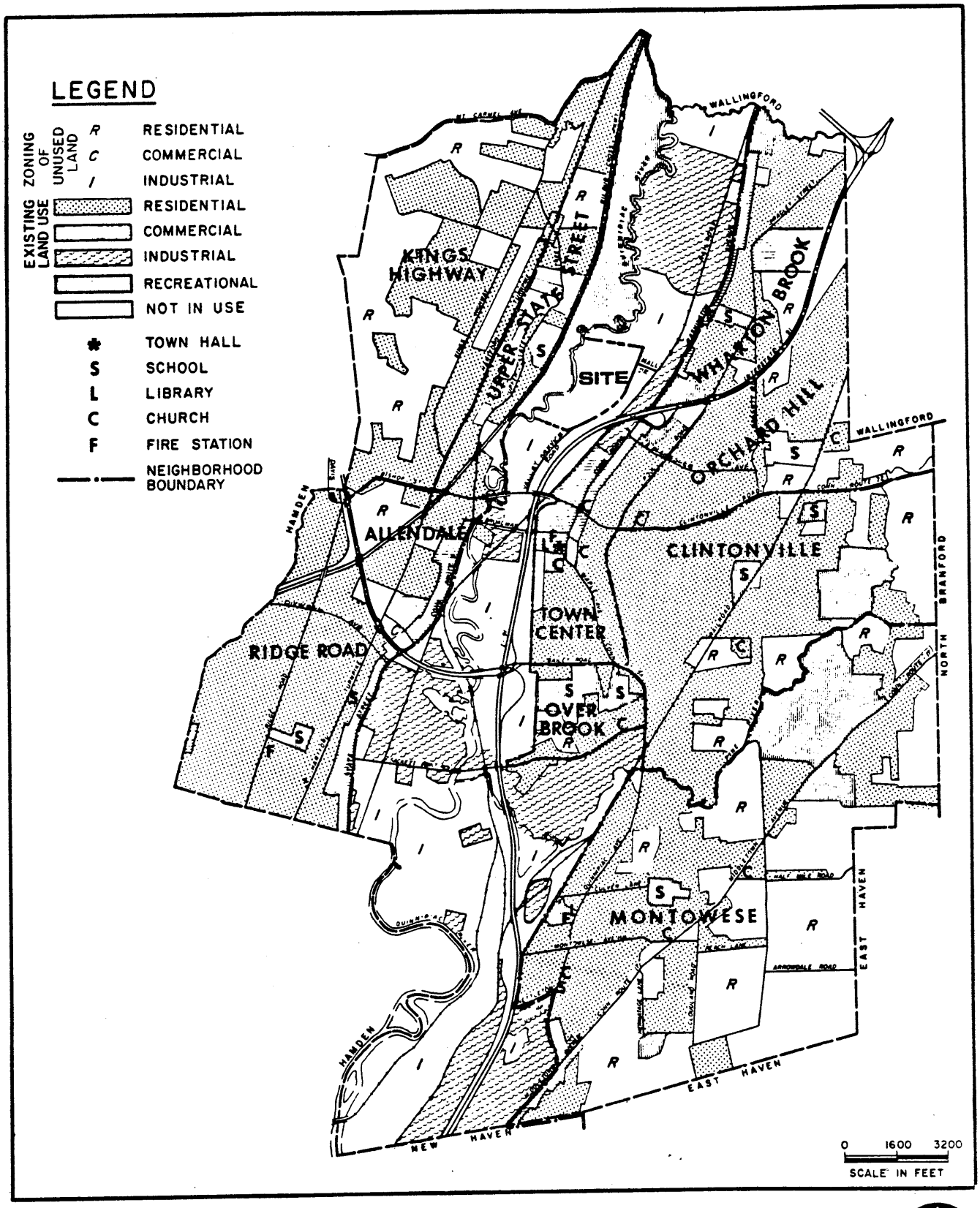
Within the town, employment has continued to increase, while the population growth has slowed. In 1970, there were approximately 15,000 jobs in North Haven, two-thirds of them in manufacturing. That same year there were 9,400 North Haven working residents with less than a third of them employed in blue collar occupations.

TABLE 11

PROJECTED BASELINE 1990 SALES
MAJOR RETAIL CENTERS
NEW HAVEN-WEST HAVEN SMSA

New Haven CBD	$ 66.1 million
Hamden's Magic Mile	$ 53.9 million
Balance of Metropolitan Area	$288.3 million
Total SMSA	$408.3 million

Source: Appendix L, Economics and Land Use



NORTH HAVEN MALL

VALLEY SERVICE ROAD

NORTH HAVEN, CONNECTICUT

LAND USE / NEIGHBORHOOD MAP

Figure 14

Source: Appendix M, Community and Visual Quality

portion. Of the site's 117 acres, 65 acres have been extensively disturbed by sand mining and quarrying activities which have cleared and lowered large segments of previously wooded topography. It has left the area appearing generally open and scarred, with a partially sandy and vegetated landscape (Figure 15). There are also several newly created ponds and approximately 41 acres of scattered and varied wetlands that add to the open and natural look of the site.

Views of the site from surrounding areas are restricted because it is situated away from the majority of residential and commercial use areas. The views to be affected are from residences to the west of the site on the hillside beyond the Wilbur Cross Parkway. The general viewing areas are illustrated on Figure 16. The residences to be affected are 110 to 260 feet higher than the site and are at a distance of 2,000 to 4,000 feet from it. This would permit a view of the mall for approximately 20-30 residences along Kings Highway and the Hartford Turnpike. Residences around State Street are situated at lower elevations and do not have horizon vistas of the existing site.

Other views of the site are from the east along the Amtrak railroad line and the southbound lanes of I-91 around Interchange 12, and from a motel on Washington Avenue north of the interchange. Viewing time for west-facing Amtrak passengers and I-91 auto passengers traveling between 45-50 miles per hour is less than 1 minute (approximately 30 seconds). Except from these areas little of the site is visible because of natural vegetation, berms or the manmade barriers of I-91, the railroad grade or because of the commercial development along Washington Avenue.

J. HISTORICAL AND ARCHAEOLOGICAL RESOURCES

1.0 HISTORICAL, AND HISTORIC ARCHAEOLOGICAL RESOURCES

1.1 General History

In 1638 New Haven Colony founders purchased the lands known today as the town of North Haven in order to assure the growing colony of a convenient and reliable food source. North Haven was very much a rural outpost where many of the earliest planters maintained residence in New Haven. Growth was slow until after 1700 when the town began to develop its own identity and activities separate from New Haven.

Although industries (brickyards, shipbuilding, mills) grew, North Haven remained an agricultural adjunct to New Haven. When New Haven became a city and was connected by roadways to other cities such as Hartford and Middletown, North Haven's agricultural endeavors changed from modest subsistence efforts to large-scale produce supply for urban markets. In fact, despite the rise of manufacturing and service industries, agriculture was a significant economic base for North Haven until World War II. Since then North Haven has become primarily a suburb of single-family homes, with access to the major urban commercial centers of New Haven and Hartford.

1.2 Proposed Mall Site

Although the clayey banks of the Quinnipiac River attracted up to a dozen functioning brickyards, the mall site was farmed until early in the 20th century. No trace of this activity remains. There are no structures on the site at present, nor is there an historical or archaeological record that there ever were. In addition, there is no evidence of any historic events at the site or linkages with historically prominent people.

1.3 Traffic Modified Areas

1.3.1 Mall Drive

Nineteenth century maps and deeds indicate that a few buildings may have been located along Washington Avenue in the area planned for the new access road (Mall Drive) from Washington Avenue to the proposed mall site. The historical record does not point to these structures as unusual examples of mid- to late-19th century dwellings or barns when compared with structures still standing in North Haven The land is presently paved, with modern buildings adjacent, and it is unlikely that any historical/archaeological features remain.

The proposed Mall Drive also runs perpendicular to a trolley line that in the late 1800s and early 1900s paralleled Washington Avenue. Any remaining evidence of track or trolley bed would be much disturbed and would not warrant archaeological investigation. In addition, there are other less disturbed and more accessible sites which offer better opportunities for investigation of track or trolley bed remains.

1.3.2 Valley Service Road

There are no existing sites or structures of historical significance adjacent to Valley Service Road. Several lots in a late 19th century subdivision were sold to individuals, but there is no evidence that structures were ever built on them. The land along Valley Sevice Road south of this subdivision was always used for farming.

1.3.3 Other Improvements

There are no existing historical structures, nor is there evidence of historical activity, in the areas to be modified for transportation access or that would be affected by secondary development. In addition, construction of the I-91 entrance and a nearby motel has altered the area near Washington Avenue.

1.4 Potential North Haven Bridge Historic District

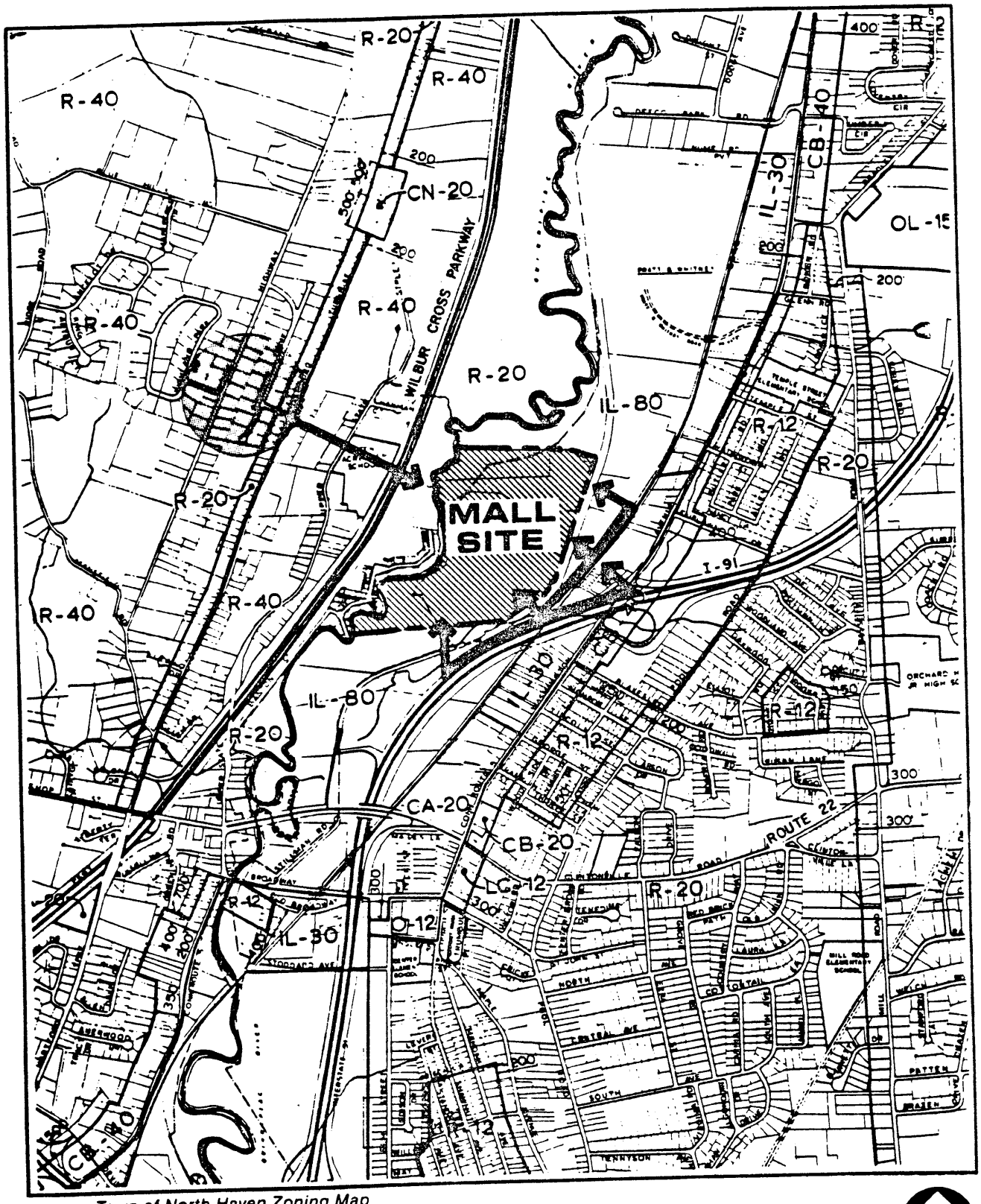
Although a formal request for an eligibility determination has not been submitted, the Connecticut State Historic Preservation Officer has

Open Area of Site - Looking West Across Site From Valley Service Road

Pond Area - I-91 (Southbound) Embankment at right; Ponds at Left

Figure 15

4/8



Town of North Haven Zoning Map

North Haven Mall
Valley Service Road
North Haven, Connecticut

Figure 16
Areas with Views of the Site

Source: Appendix M, Community and Visual Quality

identified the Bishop Street area as part of a potential historic district. Referred to as the potential North Haven Bridge Historic District, the area consists of about 45 largely residential buildings of architectural or historical significance. They are clustered in the northwestern quadrant of the town along the Quinnipiac River just west of the village green, the historic religious and governmental center of North Haven. These structures lie along State Street, Old Broadway, Philip Place, and Bishop Street.

2.0 PREHISTORIC ARCHAEOLOGICAL RESOURCES

2.1 Historical Background

There is archaeological evidence of Indian presence within the region as early as 14,000-10,000 BP (Before Present). It is not until late Archaic times (5500-3000 BP) that such occupations appear frequent in North Haven. The Connecticut Historical Commission files list 15 Archaic sites in the town, several within 1 mile of the project site. It is hypothesized that this period was characterized by a "central-based wandering" pattern with a diversified seasonal exploitation of plants and animals. Most archaeological sites resulting from such a pattern would be small single-purpose sites peripheral to the main settlement locus. This pattern may have continued until European contact, with base camps assuming increasing "permanence."

At the time of white settlement, the New Haven-North Haven area was occupied by the Quinnipiac Indians, whose lands extended through Guilford, East Haven, Branford, and North Branford to the shoreline. Dominated both by the Pequot and Mohawk tribes, the Quinnipiacs willingly exchanged their lands for British protection when the founders of the New Haven Colony came on the scene in 1638. The Indians retained hunting and fishing rights and a small reservation, probably located in present-day East Haven. Both population and reservation lands gradually declined until the lands were lost sometime in the late 18th or early 19th century.

2.2 Proposed Mall Site

The archaeological study area is limited to the principal remaining undisturbed land in the development area, which is north of the onsite mining and quarrying activities. It measures about 1,300 feet by 1,900 feet, or about 20 acres. Preliminary surveys included a surface examination of the project area and a systematic survey of more than 140 test pits which were analyzed for indications of prehistoric or historic activity.

Five prehistoric sites were located during the preliminary investigations; four were on the proposed mall site, the other was found along the proposed Mall Drive. No sites were found near Valley Service Road or in the area proposed for the jughandle. One of the five sites was judged to be of limited archaeological potential due to previous construction and quarrying, but the other four sites required more intensive surveys.

2.3 Survey Results

One of the principal purposes of the intensive survey was to assess sites for nomination to the National Register of Historic Places as loci "... that have yielded, or may be likely to yield, information important in prehistory or history." Three of the five sites under consideration might be Register-eligible. They are undisturbed and appear to represent discrete short-term occupations, and they have the potential to provide significant information about local and regional prehistoric lifestyles, particularly subsistence and settlement patterns.

K. ENERGY

Currently no activities other than sand and gravel processing occur on the site. Therefore, onsite energy consumption is nominal. For shopping under existing conditions, however, residents of the North Haven primary market area consume substantial quantities of gasoline for shopping trips to acquire the goods and services of the type which would be offered at a regional shopping facility. Vehicle travel for shoppers goods purchases by market area residents would require approximately 330,400 gallons of gasoline per day in 1980 and 355,600 gallons of gasoline per day in 1985.

IV. ENVIRONMENTAL CONSEQUENCES

A. PROPOSED NORTH HAVEN MALL DEVELOPMENT

1.0 TOPOGRAPHY, GEOLOGY, SOILS, AND GROUND WATER

1.1 Topography

The majority of the site would be altered by the project, thereby changing the existing topography. Placing approximately 700,000 cubic yards of fill in onsite ponds and wetlands and an additional 400,000 cubic yards over the remainder of the area would raise the average surface elevations to 13-30 feet (MSL) for two-level parking and the foundation pad for structures. With the exception of the detention pond, no site topographic modifications are anticipated beyond the perimeter of the proposed mall and associated parking.

1.2 Geology

Approximate depth to bedrock in the area to be developed ranges from 50 to 150 feet below MSL. As a result, no blasting would be required to set foundations and no impact to bedrock will result from the construction of the proposed mall.

The placement of buildings and pavement over surficial deposits on the project site would compact the sand, gravel, silt, and clay particles of which they are composed. Soil compaction and the placement of an impervious surface over surficial deposits are pertinent to the issue of ground water resources and are discussed in Section 1.4.

1.3 Soils

As a result of construction, the upper soil strata would be removed, and fill material would be introduced, then graded and compacted. This would reduce soil permeability somewhat, but is a minimal impact due to existing low permeability.

Generally, the erodibility of onsite soils is not high, and the projected soil loss during construction with erosion control would be about 125 cubic yards per year over the 78 acres to be developed. Eroded material would be directed through a series of sediment settlement ponds and these control measures would substantially reduce existing erosion. The extent of erosion after project completion would be less than exists at present.

Approximately 675,000 cubic yards of the fill needed for grading would be derived from the site itself, while another approximately 380,000 cubic yards would be required from offsite locations. At present the exact borrow locations are not known. No historic borrow locations remain in North Haven except for the proposed mall site. Generally, however, any

Please include what this means in truck loads.

We asked for this in scoping session.

Name offsite locations + transportation routes or EIS is not complete.

source having structural grade material removed from a natural in-situ borrow site have not been subject to chemical contamination and their materials are normally usable. Removal and quality of the fill material from any source, to be determined in the future, would be subject to all pertinent regulations for testing and use to assure environmental compatibility.

1.4 Ground Water

In the southern portion of the site and again to the north of the drainage ditch (which approximately bisects the site), the soils are porous enough to serve as a good source of ground water. At a short depth below the surface, 20 feet, these deposits are underlain by glacial lake deposits consisting of silts and clays. This lower strata is not a good substrate for storing or conveying water and would not offer significant well yields. Also, this layer's closeness to the surface would restrict the yield of the more porous surface strata.

South of the drainage ditch, surface and subsurface soils consist of sand and gravel that are porous and could serve as a source for ground water removal. But, since there has been no interest by the town or businesses in developing the site as a well field for any purpose, well tests for water yield and quality have not been made. It is not likely that the site could serve as a significant source of high quality water because of its close proximity to the river. Significant ground water withdrawal that would be needed to maintain substantive yields could develop a cone of influence, or drawdown, to cause the river's waters to infiltrate back into the site's ground water, which could create water quality problems for its users. Maximum anticipated yields from wells drilled on portions of the site would not be sufficient for municipal or industrial uses. The town of North Haven currently receives its water from the South Central Connecticut Regional Water Authority and has no plans to alter this arrangement (Town of North Haven, September 4, 1981).

Construction and operation of the proposed mall would not affect existing potable water supplies. Construction would not have an impact on soils either to contaminate or restrict the ground water flow where it could be withdrawn for potable use. Soil compaction by the placement of new buildings and pavement would be limited to the upper strata with settlements of approximately 0.3 to 3.0 inches occurring. Greater loadings from column footings would induce an additional 0.5 to 2.0 inches of settlement. The water-holding capacity of surficial deposits and the quantity of onsite ground water would remain essentially unchanged. Placing an impervious surface over 78 acres of the site would, however, cause a reduction in the site's recharge potential. This loss in the northern portion of the site is relatively minor because of the underlying deposits of silt and clay which already prevent significant recharge. Impacts associated with recharge potential would also be limited with the site's close proximity to the Quinnipiac River which would not permit sufficient time for water to infiltrate deep strata before being affected

by the river's flow. As such, the significant recharging occurs in the watershed that will not be affected by construction of the proposed mall. In addition, the small amount of surface area to be filled and covered is very small in comparison to the large area for recharge potential in the watershed.

The quality of ground water sources in the vicinity of the site and its use for potable supplies would not be affected by the proposed mall's operation. By design, the majority of runoff, approximately 75 percent, from the proposed mall and parking lot would be directed to the detention pond for settlement and containment, reducing opportunities for infiltration of potential contaminants to the water table. Overflow waters and the remaining drainage/runoff would be directed to the Quinnipiac River.

Again predicting the future with out saying "probably or likely."

1.5 Transportation Modified Areas

The small size of the areas that would be modified for transportation purposes minimizes their topographic, geologic, and ground water impacts. Potentially high soil erosion along Valley Service Road and the proposed jughandle would be controlled through measures described in the sediment and erosion control plan (Appendix D, Sediment and Erosion Control).

1.6 Secondary Development

Secondary development impacts would be confined primarily to those sites that are not fully occupied along Washington Avenue, and to sites along the east side of Valley Service Road, where whatever new office or commercial development spurred by the mall's development is anticipated (Section 8.5, Land Use Impacts). The degree to which these impacts could occur would depend on the precise nature of subsurface materials, the extent to which each site is developed, and the application of mitigative controls. New development would be subject to the zoning and planning controls of the town of North Haven, and any appropriate State and Federal licenses and permits.

1.7 Cumulative Impacts

Cumulative impacts to local and regional resources would result from additional development, unrelated to the mall, within the aquifer associated with the Quinnipiac River. Approximately 110 acres within the area from Wallingford to New Haven have been identified for potential development. Impacts created by development in these areas are likely to be similar to those associated with the proposed mall. Within the extent of the aquifer associated with the river (about 23 square miles from New Haven to Meriden), these potential development areas, including the proposed mall, would constitute approximately 1 percent of the total aquifer.

Is this a valid area in which to look at the percentage of total aquifer What is the percentage of the aquifer in No H?

And what exactly happens to the total acquifer quality if you develop any of the acquifer

2.0 VEGETATION, WILDLIFE, AND WETLANDS

2.1 Vegetation

2.1.1 Mall Site

The acreage of each vegetative community type to be affected by the proposed mall development is given in Table 12 and illustrated on Figure 17. The loss of approximately 78 vegetative acres from store and parking development will reduce the site's vegetative diversity and interspersion and decrease the extent of the diverse "edge" habitat. Of the 41 acres of existing wetlands (24 natural and 17 manmade), a total of 25 acres would be eliminated by mall construction, including 8 acres of natural wetlands, and the remaining 16 acres of natural wetlands (primarily wooded swamp) would be preserved. In addition, 47 acres of upland vegetation would be eliminated, primarily affecting 26 acres of previously disturbed areas and 17 acres of upland forest.

2.1.2 Transportation Modified Areas

Vegetative impacts associated with access improvements are limited, as most affected areas are small and exhibit a relatively low vegetation diversity. One acre of shrub swamp would be affected by the construction of Mall Drive, while the jughandle would primarily affect roadside vegetation. A small area of wooded swamp, approximately 0.2 acre, near the Quinnipiac River would be altered by the jughandle. In addition, approximately 4.5 acres of upland vegetation would be lost, including communities of upland forest, old field, disturbed and developed areas (Table 13).

While not directly affected by transportation modifications, some wetland areas near the roads in question could be indirectly affected by construction activity. Through careful sediment and erosion control measures (Appendix D, Sediment and Erosion Control), this possibility can be reduced.

2.2 Wildlife

During construction, it is likely that some wildlife mortality would occur among less mobile groups of animals, such as small mammals, reptiles, and amphibians. Other wildlife species would be displaced. Small mammals such as mice, voles, or moles may be totally displaced from the site because their home ranges are characteristically small. For other species, such as larger mammals and birds who may use the area only for feeding and cover, the displacement would probably be partial since their home ranges are more extensive. As portions of the site would revegetate after construction is complete, some wildlife species, such as small mammals and a variety of songbirds, would reinhabit the undeveloped and landscaped areas around the mall structures and parking.

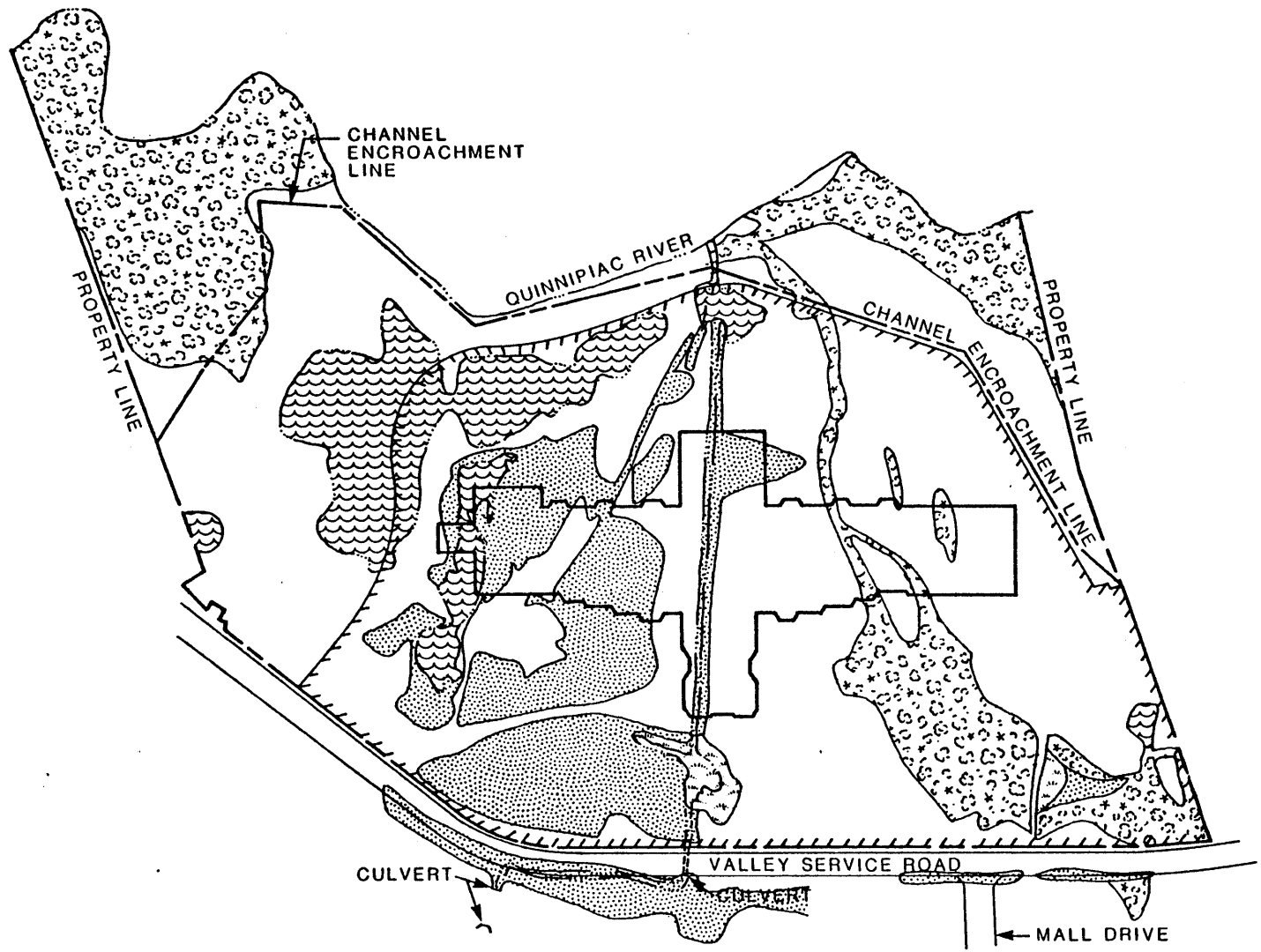
TABLE 12
VEGETATION COMMUNITY TYPES TO BE
ALTERED ON NORTH HAVEN MALL SITE*

Vegetation Community Type	Percentage of Community Altered	Acres
Upland		
Upland Forest	85	17
Successional Shrub	50	1
Old Field	50	3
Disturbed	79	26
Developed	0	0
Subtotal		47
Wetland		
Wooded Swamp	33	8
Shrub Swamp	100	16
Marsh	100	1
Subtotal		25 **
Open Water		
Subtotal	60	6
Total		78

* Acreages do not include vegetation community types associated with the transportation improvement areas.

** This total includes approximately 8 acres of natural wetlands (primarily wooded swamp) and approximately 17 acres of manmade wetlands.

Source: Appendix B, Vegetation, Wildlife and Wetlands



NORTH HAVEN MALL
North Haven, Connecticut

0 250' 500'

Source: Appendix B, Vegetation, Wildlife and Wetlands

Wetlands-Site Plan Overlay

Wooded Swamp
Shrub Swamp
Marsh
Surface Waters
Limits of Development

Figure 17

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TABLE 13

ACREAGES OF VEGETATIVE COMMUNITY TYPES
ALTERED BY THE TRANSPORTATION MODIFICATIONS

Vegetation Community Type	Transportation Modification			
	Mall Drive	Valley Service Road	Jughandle	Total
Upland				
Upland Forest	--	0.1	--	0.1
Old Field	0.9	1.7	0.6	3.2
Disturbed	0.1	--	--	0.1
Developed	1.1	--	--	1.1
Subtotal	2.1	1.8	0.6	4.5
Wetland				
Wooded Swamp	--	0.1	0.1	0.2
Shrub Swamp	0.1	0.9	--	1.0
Subtotal	0.1	1.0	0.1	1.2
TOTAL	2.2	2.8	0.7	5.7

Source: Modified from Appendix B, Vegetation, Wildlife and Wetlands

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Because the great blue heron, osprey, and common (Wilson's) snipe are transient in the project area, impacts on them are expected to be minimal.

2.3 Endangered and Threatened Species

There is no known impact upon endangered or threatened species.

2.4 Secondary Development

The extent of any vegetative and wildlife impacts from secondary development would depend upon location of the development and mitigative measures to be undertaken. Any development would be regulated in accordance with the town of North Haven, State and Federal regulations.

2.5 Cumulative Impacts

The town of North Haven contains approximately 2,100 acres of wetlands; 900 of them occur along the Quinnipiac River. Given the wetland acreage to be altered on the project site (25 acres), and assuming that all 20 acres of wetlands contained in other proposed developments along the Quinnipiac River in the town will also be altered, mall development would result in a loss of approximately 5 percent of the wetlands occurring along the river in North Haven and approximately 2 percent of the wetlands in the entire town.

Is this loss not significant? Any loss of wetlands is significant. What percentage would be considered important?

3.0 SURFACE WATER RESOURCES AND WATER QUALITY

3.1 Water Quality Impacts

3.1.1 Impacts Associated With Construction

Through the use of the existing ponds on the site, the proposed new detention pond, and the implementation of a sediment and erosion control plan, water quality impacts during construction are not expected to be significant. Details in Appendix D indicate that less sediment would enter the Quinnipiac River during construction than currently leaves the site. This improvement would be the result of controlling most storm water runoff from the site, and a large area upstream, to settle prior to discharge into the river (Appendix C, Surface Water Resources and Water Quality; Appendix D, Sediment and Erosion Control; and Appendix E, Storm Water Management).

this point is debatable

3.1.2 Impacts Associated With Operation

Operation of the proposed mall would result in contaminants, such as heavy metals, oil, and grease, that accumulate on road and parking surfaces, to be washed off by storm water into drainage and containment facilities. Based on experience at other shopping centers and highways, it has been estimated that there would be a small addition of contaminants to the base load of the Quinnipiac River. However, with the installation

of oil and grease traps in the onsite drainage system and the diluting effect of the flow in the river, the project would not violate water quality standards (Appendix C, Surface Water Resources and Water Quality).

The use of deicing salt during winter months could raise the chloride concentration in the detention pond and Quinnipiac River by an estimated maximum concentration of 2.0 mg/l and 1.0 mg/l, respectively. Deicing salts and the ponds depths would serve to chemically and thermally stratify the water body. What about the effect of Oil & Asphalt leaching on fish that are suppose to be in the pond.

Approximately 1.4 tons of chloride would be spread over pavement surfaces within the catchment area during a normal winter. A normal amount of precipitation would result in a chloride concentration of 18.0 mg/l in the runoff, causing a 4.0 mg/l increase in the hypolimnion. During a spring turnover, in which the epilimnion and hypolimnion mix, a chloride concentration of 2.0 mg/l above the background level may result. The epilimnion would normally be well mixed and flushed, helping to dilute concentrations leaving the pond and entering the river. Within the river, mixing would yield a 1.0 mg/l increase in chloride concentration. This would have a nominal impact on overall water quality of the river.

Suspended solids and associated adsorbed pollutants (such as heavy metals) in the storm water would be settled in the storm water detention basin (Appendix E, Storm Water Management), resulting in a net reduction in solids entering the Quinnipiac River over current conditions. There would be minimal impact from runoff waters draining over warm pavements during the summer. The warm temperatures of runoff would be short lived since rainfall would quickly cool the parking lot pavement and waters would flow through cool underground culverts into the storm water detention basin to mix with much larger volumes of cooler water.

The detention pond would stratify during the summer months due to thermal and chemical differences between the epilimnion and the hypolimnion. This could produce low oxygenated or anoxic bottom conditions. (Implications are discussed below in Section 3.2, Biological Impacts).

Water quality impacts associated with transportation modified areas would not be substantive and cannot be incrementally measured because of the small area to be covered by an impervious surface and the use of sediment and erosion control measures.

3.2 Biological Impacts

Placement of fill in the existing ponds would result in the mortality of some aquatic organisms. No resource of significant human or economic value would be affected, nor would the integrity of the resource be affected in the region. The detention pond has been designed to mitigate the partial loss of some spawning area for anadromous fish, such as

Minimizing again
Little by little this area will be converted into nothing more than a drainage ditch.

herring, by allowing for the free passage of fish to and from the river. The river's aquatic communities are not expected to be affected by mall construction or operations. In particular, the identified areas of soft-shelled clams and oysters near the mouth of the Quinnipiac River would not be impacted by suspended solids generated by the proposed development. The implementation of the storm water management plan and sediment and erosion control plan would result in less suspended solids being contributed to the river than now occurs under existing conditions (Appendix C, Surface Water Resources and Water Quality; Appendix D, Sediment and Erosion Control; and Appendix E, Storm Water Management). very Questionable

As indicated in the above section, the pond waters would stratify during the summer months. A thermocline would develop at approximately a 10-12 foot depth, with anaerobic conditions developing in the cool deeper waters. This would make for generally poor habitat in deeper waters and along the bottom. The surface waters, however, would remain oxygenated, offering aerobic conditions that would provide for a greater volume of water habitat than that provided by the existing ponds. Conditions in the epilimnion would not alter the reproduction and growth of fish any differently than the conditions that now exist in the ponds.

Land-originated materials entering the pond with runoff would promote algae growth. Diatoms would predominate during the spring, while green and bluegreen algae would dominate during the summer. The flushing rate of the detention pond is estimated at .75 times per month (approximately 3 weeks) during the summer. This may be sufficient to control potential oxygen depletions that could cause anoxic conditions, odors or fish mortalities. Experience with other ponds and lakes in the region with even longer flushing rates indicates there may not be any significant problem. There is, however, the potential that algae blooms could develop in less time than the flushing rate, and that stratified conditions could produce low oxygenated waters or anoxic bottom conditions. If severe enough, this could promote the production of sulfide gases and cause a "rotten egg" odor around the pond. Mitigation would be needed to alleviate this condition and such measures could include the addition of aerators, circulators, or the addition of oxygenated waters.

5 weeks, please, a little realism would be appreciated

Would they do it? Or would it be another Upjohn, especially if economic conditions worsens? for this area.

Because of the small areas associated with the transportation modifications and the use of sediment and erosion controls, no significant biological impacts would occur.

3.3 Secondary Development

they would be very significant

Impacts associated with secondary development would likely include the alteration of drainage patterns, some loss of aquatic organisms if onsite waters are filled, and some increases in the concentrations of various pollutants above existing levels of water quality in the Quinnipiac River. Any secondary development would be smaller in scope than the proposed mall, and would result in proportionately less impacts to water resources.

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3.4 Cumulative Impacts

Consideration of all present or pending building permits associated with wetlands for Wallingford, Hamden, New Haven, and North Haven (not including the proposed mall site) found approximately 110 acres of land subject to potential development close to the Quinnipiac River. If all were developed, the same types of impacts as those associated with the proposed North Haven Mall may be anticipated. These include some loss of aquatic organisms from any onsite surface waters to be filled and an increase in the concentrations of various pollutants, which should not cause a significant alteration of either water quality or aquatic communities associated with the Quinnipiac River. Under secondary development or cumulative impacts, it is not expected that there would be any consequential effects on the integrity of the region's water resources from development alone. Not sure though

3.5 Hydrologic and Hydraulic Impacts (Flooding)

Development of the proposed mall would result in a net loss of volume of temporary onsite storage of floodwaters ranging from 47.3 acre feet for the 2-year storm to 214 acre feet for the 100-year storm. Results of hydrologic analysis (detailed in Appendix F, Quinnipiac River Flood Study) show that this loss of volume would not increase peak flood flows in the Quinnipiac River due to the small volume of storage available at the site relative to the total volume of the flood. The analysis shows that the filling of all developable property along the river in North Haven, with full encroachment of the floodway, would result in a 4 percent increase in peak flows for extreme 100-year storms, with lesser increases for smaller floods.

An hydraulic analysis of water surface profiles also showed that the proposed mall would have no measurable impact upon flooding in the river. The analysis did show that filling all developable properties along the river between New Haven and North Haven, up to the floodway line, would result in increased water levels in the Quinnipiac River of from 0.04 to 0.64 feet. Full encroachment of all lands upon the river would increase flood levels from 0.14 to 1.1 feet, with the greatest increase at Sackett Point Road where the river is constricted. The likelihood of creating these conditions is not foreseeable, or likely, but they illustrate a "worst case" situation. These cumulative impacts would occur as a result of the conveyance ways for floodwaters being constricted by filling along the developable properties, rather than as the result of a cumulative loss of flood storage. Filling a conveyance way would obstruct the flow of floodwaters, thereby increasing the potential for flooding.

what about Broadway?

To put the effects of storage into perspective, the impact of the loss of storage in the Quinnipiac River basin resulting from the 1979 failure of the Community Lake Dam in Wallingford was analyzed. This analysis showed that with a loss of storage from two to three times

greater than the net reduction from the proposed mall, peak flows increased a maximum of 1.2 percent in the 2-year storm. The analysis, detailed in Appendix F, illustrates that the Quinnipiac River is relatively insensitive to the loss of channel storage associated with river-edge development in and upstream of the town of North Haven. Flood conditions would not be aggravated upstream or downstream of the mall site by development of the proposed mall.

With respect to storm water drainage, the proposed detention pond would reduce the rate of flow now entering the Quinnipiac River from the site and from areas draining through the site for all but the smallest storms. For example, the detention pond would reduce the peak storm water flow now discharging from the site during a 100-year storm by almost 31 percent. This would reduce the present contribution of runoff now coming from the pond's drainage area. Plans for the proposed mall indicate that the lower levels of the parking lots would begin to flood for storms of greater than a 10-year frequency offering some onsite storage.

How could this be, the pond is always at the level of the river because of soil permeability. Therefore if any filling of the total mall area is done, it is bound to reduce storage capacity. 31% is almost 1/3

4.0 TRANSPORTATION

4.1 Mall Traffic

4.1.1 Trip Generation

Mall-generated traffic for 1985 was estimated using published information regarding trip generation rates for shopping centers of comparable facility and size. These estimates were then increased to reflect the fact that during certain hours and certain days the proposed mall would attract a "greater than average" amount of traffic. Such traffic estimates are termed "design estimates." It is anticipated that on a "design weekday" the mall would attract 21,000 vehicles (representing 42,000 trips), and on a "design Saturday" the mall would attract 28,000 vehicles (or 56,000 trips) (Table 14).

These estimates are reasonable and have not been reduced to account for (1) a probable increase in multipurpose trips due to the energy shortage, (2) trips made on public transportation, if any, and (3) the fact that some vehicles going to the shopping center would already have been on the road to some other retail facility.

Good Thing Mall Develop. has never given a word to public transportation in any submission to DOT

4.1.2 Trip Distribution and Trip Assignment

The towns of origin from which mall-related trips would be made was determined from a weighted gravity model analysis. This analysis incorporated, among other factors, DOT trip data, information on projected population patterns, relative travel times, competing shopping facilities, and socioeconomic characteristics. Based on these distributions, the travel patterns of customers and employees could be estimated and their trips assigned to specific routes.

TABLE 14
ANTICIPATED SITE TRAFFIC VOLUMES
NORTH HAVEN MALL

PERIOD	NUMBER OF TRIPS In	Out
Design Day		
Weekday (24 hours)	21,000	21,000
Saturday (24 hours)	28,000	28,000
Design Hour		
5:00-6:00 P.M.-Weekday	1,760	2,000
3:00-4:00 P.M.-Saturday	2,530	2,640

Notes: Assumes a regional shopping center containing aproximately 1,120,000 square feet of gross leasable area (GLA), with four department stores as anchors.

Values indicated are design volumes; average volumes are estimated to be significantly lower. Weekday hours 5:00-6:00 PM reflect the time when traffic is likely to be most complicated by local street movements. This represents a more problematic situation than the single hour of greatest mall traffic.

Design Day - Shopping day in December.
Design Hours - Traffic volumes are calculated by taking the average of traffic flows during peak hours.

Source: Modified from Appendix H, Transportation

Residents of North Haven would naturally utilize the many local and collector streets on which they now travel, while most trips from outside North Haven would be made on major access routes, which are faster and more convenient for longer distance trips. The majority of shoppers (61 percent) would arrive via I-91 and the Wilbur Cross Parkway. Except in the immediate vicinity of the mall, none of the Connecticut State routes would carry more than 7 percent of mall-related vehicles and most access routes in North Haven would carry smaller volumes (Figures 6, 8, and 9 in Appendix H, Transportation).

4.2 Roadway Impacts

4.2.1 Market Area

The addition of North Haven Mall traffic would not have a significant effect on the operating characteristics of either I-91 or the Wilbur Cross Parkway. Both highways have the capacity to accommodate increased traffic flows.

4.2.2 Macroanalysis Area

A detailed analysis of the major and secondary routes that would carry mall-related traffic within the town of North Haven indicates that all of them would be able to accommodate mall traffic adequately. Roads in the macroanalysis area would not be affected to the same degree as would roads in closer proximity to the mall (microanalysis area). As shown in Table 15, 5 of 17 roadways would experience a lowering in their level of service from "A" to "B" or "B" to "C" due to mall-related traffic during peak hours. (See Appendix H, Transportation, for descriptions on levels of service.) This indicates that road operating conditions would remain at acceptable levels of service with no substantial change in traffic conditions. In contrast to levels "A" and "B" which generally provide for unrestricted traffic flow, "C" could be related to occasional balky suburban strip traffic, or urban design criteria. Level "D" is generally associated with urban flow characteristics, while levels "E" and "F" are considered to provide generally unacceptable levels of service.

4.2.3 Microanalysis Area

Roads in the immediate area of the proposed mall would have the largest volume and concentration of mall-generated traffic and consequently the most pronounced impact. In close proximity to the mall, movements at intersections have the greatest effect on reducing traffic operating levels. A detailed analysis of 15 intersections indicated that all intersections would operate at levels from "A" to "D" during the daily peak hour of traffic. Most would operate at level "C," which signifies generally stable flow with satisfactory operating speeds (Table 16). With mall traffic, 11 intersections would operate at the "C" level of service and 4 at level "D." The analysis shows that with the mall 4 of 15 intersections would operate at levels below that expected without the

TABLE 15
ROADWAY IMPACTS IN MACROANALYSIS AREA
LEVELS OF SERVICE, 1985 W/WO MALL

Location	1985 Background (without Mall)		1985 Combined (with Mall)	
	Daily Traffic	Level of Service	Daily Traffic	Level of Service
Major Routes				
I-91 north of Interchange 12	44,500	A	46,600	B
I-91 south of Interchange 11	56,000	C	71,100	C
W.C. Parkway north of Interchange 63	22,400	B	24,500	B
W.C. Parkway south of Interchange 63	27,800	B	34,100	C
Clintonville Road (Route 22) near North Branford Town Line	9,100	B	11,600	C
Clintonville Road (Route 22) west of Bassett Road	8,400	B	10,500	B
Davis Road (Route 22) at Hamden Town Line	4,700	B	6,380	C
Bishop Street (Route 22) west of Hartford Turnpike	4,900	B	7,400	C
Washington Avenue (Route 5) at Wallingford Town Line	12,600	C	13,860	C
Dixwell Avenue (SR 717) west of Ridge Road	14,300	C	15,980	C
State Street (Route 5) at Hamden Town Line	12,800	C	14,480	C
State Street (Route 5) south of Broadway	7,300	C	10,240	C
Quinnipiac Avenue (SR 750) north of Montowese Avenue	8,700	C	10,400	C
Maple Avenue (SR 750) south of Broadway	6,600	C	9,120	C
Secondary Routes				
Pool Road north of Clintonville Road	6,300	C	6,930	C
Blakeslee Avenue west of Bassett Road	3,150	B	3,780	B
Hartford Turnpike south of Mount Carmel Avenue	3,400	B	4,030	B

Source: Appendix H, Transportation. Level of service compares volume of traffic to the capacity of the road to handle it. Level of service for roadways is measured on a scale of "A" to "F" representing conditions ranging from free flow to forced traffic flow. Level of service "D," the minimum acceptable level, describes a condition where traffic is approaching unstable flow but maintains generally tolerable operating speeds.

TABLE 16
SUMMARY OF INTERSECTION ANALYSES
IN MICROANALYSIS AREA
LEVELS OF SERVICE, 1985 W/WO MALL

Intersection	Day	Peak Period	Level of Service Background (without Mall)	Level of Service Combined (with Mall)
Washington Avenue - Mall Drive	Sat	3-4 PM	*	D
Washington Avenue - I-91 Southbound Off and On Ramps	Wkdy	3-4 PM	B	C
Washington Ave. - I-91 Northbound Off and On Ramps	Wkdy	3-4 PM	C	C
Washington Ave. - Blakeslee Avenue	Wkdy	3-4 PM	C	C
Washington Ave. - Clintonville Road	Wkdy	4-5 PM	D	D
Route 22 - I-91 Northbound Off Ramp	Wkdy	4-5 PM	C	C
Route 22 - Valley Service Road	Sat	1-2 PM	N/A	D
Route 22 - Valley Service Road	Wkdy	4-5 PM	B	N/A
Route 22 - State Street	Wkdy	4-5 PM	C	C
Route 22 - Route 15 Northbound Off and On Ramps	Wkdy	4-5 PM	B	C
Route 22 - Hartford Turnpike	Wkdy	4-5 PM	C	C
Hartford Turnpike - Route 15 Southbound Off and On Ramps	Wkdy	4-5 PM	C	C
Valley Service Road - I-91 Southbound On Ramp	Sat	1-2 PM	N/A	C
Valley Service Road - I-91 Southbound On Ramp	Wkdy	4-5 PM	A	N/A
Valley Service Road - South Access Drive	Sat	2-3 PM	*	D
Valley Service Road - Mid Access Drive	Sat	2-3 PM	*	C
Valley Service Road - Mall Drive	Sat	2-3 PM	*	C

* - Intersection would not exist in 1985 without the mall.
N/A - Not analyzed; not the peak period.
Source: Appendix H, Transportation

mall. Three of these four would be reduced to the "C" level of service, and one to "D." Two intersections involving local roads, outside of the mall site's entrances, would experience drops in present conditions to "D" levels of service if the mall is constructed. The proposed Washington Avenue-Mall Drive intersection would function at a level "D" during its peak period, whereas free flowing-traffic exists now. At the Route 22-Valley Service Road intersection, mall-related traffic would shift the peak hour of operation from a weekday 4-5 p.m. time to a Saturday 1-2 p.m. time and would cause a level "D" service during that hour, whereas without the mall the worst peak hour condition is a level "B" service.

Some traffic can be expected to divert from the primary access routes to try to "beat" or get around mall-related traffic, even if there is no savings in time or convenience. Due to drivers' perceptions of time and convenience, or their degree of comfort in driving familiar roads under new conditions, alternate routes through residential areas may be sought. The most likely detour attempt may involve avoiding the Washington Avenue and Clintonville Road (Route 22) intersection. Here traffic is most likely to use Pool Road to Blakeslee Avenue as its route to Washington Avenue. Blakeslee Avenue is expected to receive approximately 3 percent of the mall's approach traffic; most of it, however, would originate from within the Clintonville area. Projected for 1985, the analysis shows that the mall would generate approximately 105 cars, in addition to the background volume of 315 cars, during peak hour of travel along Blakeslee.

Traffic from the east of Clintonville area would likely use Bassette Road and Temple Street to Washington Avenue, as Pratt and Whitney traffic does. Although not quantified, this volume would be a portion of the projected 4 percent approach traffic heading south along Washington Avenue toward Mall Drive.

How traffic will divert itself to get to the mall, or past it, cannot be precisely evaluated since it would rely on driver preferences, perceptions and driving habits. In the analysis leading to the above results, it was assumed that proposed road modifications would be made in conjunction with the development of the mall. A description of these modifications and the responsibilities for them are contained in an agreement between the town of North Haven and Mall Properties, Inc. (Contract of Sale, November 27, 1974). In addition, the analysis assumed development of the modifications to Bishop Street approved by the State and the modifications now under construction along Washington Avenue. ASSUMES improvements which may never take place, or at least not in the near future.

4.3 Vehicle Miles of Travel

The development of a regional shopping center can reduce the average number of shopping trips made by consumers because one trip can be made to a regional mall with a large number of stores in order to obtain the same retail services that would otherwise require many trips to more dispersed shopping facilities. If a major retailing facility is centrally located,

, but it might increase
al travel distance. Biased
o-mall statement. Doesn't give
complete picture or
allow for objective
analysis.

it could reduce the total travel distance required to make shopping trips. It has been projected that the proposed mall development can reduce regional vehicle miles of travel (VMT) in its market area.

Using DOT data on trip generation rates for retail facilities, the expected diversion of sales from existing centers to the proposed North Haven Mall, and the town of origin of shoppers, it has been estimated that the proposed mall operation would result in a regional reduction of approximately 12,000 vehicle miles of travel per day in the market area.

4.4 Public Transportation

is is biased. They
ay not be, too. More
kely not, without
orth Haven subsidy
here go our tax $...

Should the North Haven Mall be constructed, it would become a major activity and employment center and thus a potentially significant generator of new transit trips. Because of this, new or revised bus routes between the proposed mall and surrounding communities may be established, with the mall itself becoming a bus terminal and/or transfer point for a new or rerouted bus line (Connecticut Transit Bus, August 1981). To accommodate such future use, the proposed design for the North Haven Mall would allow buses to enter, circulate through, and exit from the site with a minimum of delay and circuity. The site plan includes one or more locations suitable for bus stops conveniently situated for employees, shoppers, and visitors.

4.5 Construction Impacts

The volume of construction worker traffic is relatively small (up to about 530 workers over 36 months), and is not expected to materially affect the level of service on any roadway within the project area.

The effect of construction-related trucking over State and town roads for hauling supplies and fill material was assessed. Since the location of a source for fill material is not presently known, the following potential routes of access to the proposed mall site were included: Valley Service Road, Route 22, Bishop Street, Hartford Turnpike, Clintonville Road (Route 22), Washington Avenue (US 5 and 5A), State Street (US 5) and Quinnipiac Avenue (US 5A). Routing from out-of-town sources would likely occur over Interstate 91 where no impact would be expected. Wilbur Cross Parkway will not be affected since it prohibits truck traffic.

North Haven does not have a road classification ordinance. All roads, except where posted, are open to truck traffic. The legal maximum gross vehicle weight within the State is 73,000 pounds, and 80,000 pounds with a permit.

Impacts associated with construction trucking on local roads is generally limited to its effects on road surfaces and noise. No significant impact to road surfaces is expected, or would cause the town added expense. The above-mentioned roads are presently open and used by the

type of trucking that would use it as a result of mall development. These roads are maintained by the State. The use of local residential or other town-maintained roads would be expected only if a fill source were located within the town. No available sources presently exist. Should one become available, its use would require a town Planning and Zoning approval, with a public hearing. The town would have control over establishing the haul roads and work hours to restrict the hours of noise and maintenance potential. The town has indicated that no additional or accelerated road maintenance is anticipated, having had experience with previous hauling where greater quantities were transported than are expected for the proposed mall (Town Engineer, Fazzino, September 4, 1981). Haul roads would be surveyed by the town prior to use and the developer would be responsible for routine cleaning and any accelerated maintenance costs.

4.6 Secondary Development

What does this mean?

Secondary development within the town of North Haven is expected to occur slowly and in proximity to the proposed mall, subject to the development plans of the town of North Haven. Experience indicates that secondary commercial and office development resulting from, and in proximity to, a large regional shopping center typically does not cause traffic impacts in direct proportion to the amount of building area being added because of the substantial interaction with the major traffic generator. For this reason, no measurable traffic impact is expected from secondary development within the first few years of mall operation. While there may be some traffic impacts from secondary development during the 10-15 year period following the opening of the mall, these impacts are not quantifiable at this time.

maybe not directly proportional. But the secondary impact still has to be substantiated.

All traffic impacts would be negative

4.7 Cumulative Impacts

No cumulative impacts are anticipated since there is no anticipated development which would add significant amounts of traffic to mall access routes. Traffic analyses incorporated a 1-percent growth factor, which reasonably accounts for expected future growth.

5.0 AIR QUALITY

5.1 Operational Impacts

5.1.1 1984 CO Projections

Estimates of 1984 peak 1-hour and 8-hour carbon monoxide (CO) concentrations at the ten "worst-case" prediction sites are presented in Appendix I, Air Quality, to compare conditions with and without the mall, and present 1980 conditions. Predictions were based on peak-patronage traffic volume estimates, "worst-case" meteorological conditions, and implementation of the Connecticut I&M program. All predicted maximum 1-hour and 8-hour CO concentrations were below the NAAQS for CO. In all cases but one, predicted 1-hour and 8-hour CO concentrations, while higher

Progress of this program should be checked out at DEP. If not proceding well it would be used as point of criticism.

than the 1984 no-build values, are below those predicted at the identical sites in 1980. The exception occurs at the proposed new intersection at Washington Avenue and Mall Drive, where this location now has freeflowing traffic. The generally lower values are due to the combined effects of the replacement of older vehicles with relatively new catalytic equipped vehicles (vehicle turnover), and the implementation of the I&M program.

5.1.2 1984, CO, HC, and NO Pollutant Burdens

Details in Appendix I, Air Quality, present the total estimated 1984 vehicular pollutant burdens of CO, hydrocarbons (HC), and nitrogen oxides (NO) for the mesoscale area, with and without the proposed mall (again assuming implementation of I&M program). The pollutant burdens shown were based on vehicular sources only and did not include contributions from stationary (nonmobile) sources because such emissions at the mall site would be insignificant. The results indicate that operation of the North Haven Mall would result in a small (approximately 0.15 percent) decrease in vehicular pollutant burdens for all pollutants. This change reflects the projected decrease of approximately 12,000 vehicle miles traveled per day (Section 4.3). Ambient mesoscale concentrations of photochemical oxidants will decrease in proportion to the small projected decreases in HC and NO.

5.2 Construction Impacts

5.2.1 Dust

There would be no significant onsite demolition, and the primary source of dust emissions would be the land clearing. A large proportion of this dust is of a relatively large particle size, and much of it is expected to settle to earth within a short distance from the construction site and not significantly impact nearby residential areas or community facilities. Some dust above existing conditions could be expected as a result of normal construction activities. This would be temporary, lasting only during the construction period. To help minimize the effect, dust control measures, such as watering of affected areas and the use of dust covers for trucks, would help to control increases in ambient concentrations of particulate matter.

would this be required?

5.2.2 Mobile Source Emissions

Gaseous hydrocarbon and nitrous oxide emissions from the private vehicles of construction workers, construction equipment at the site, and from traffic in the vicinity of the site are expected to have a negligible effect on regionwide concentrations of photochemical oxidants.

Some small increase in ambient CO concentrations can be expected due to decreased vehicle speeds in the vicinity of the construction site, emissions from the private vehicles of construction workers, and from construction vehicles at the site. Since the higher the vehicle's speed

the lower the quantity of CO emitted, disruptions in existing traffic due to construction and land clearing activities would be minimized to avoid decreases in vehicle speeds and elevated concentrations of CO. This would be accomplished, wherever feasible, by providing for maintenance of the existing number of lanes of through traffic. Emissions from construction vehicles would not be a major source of CO since most types of construction equipment are diesel powered and emit relatively low amounts of CO.

5.2.3 Consistency with State Air Quality Implementation Plan

The construction and operation of the proposed North Haven Mall would cause no NAAQS violations, and would be consistent with the control strategies in both the existing implementation plan and the December 23, 1980 plan revisions.

5.3 Secondary Development

Due to federally mandated reduced vehicle emissions, and because any probable secondary development would be on a significantly smaller scale than the proposed project, no significant secondary development air quality impacts are anticipated. naturally

Significant to whom? The developer?

5.4 Cumulative Impact

No significant traffic increases along the access routes to the proposed mall are projected from projects to be developed contemporaneously with the mall. Therefore, no significant cumulative impacts on ambient air quality are anticipated. naturally

6.0 NOISE

6.1 Operational Impacts

Estimated future noise levels, both with and without the mall, were not significantly different from existing noise levels. Predicted 1985 24-hour equivalent noise levels, ($L_{eq(24)}$), without the mall ranged from 56 to 79 dBA and with the mall ranged from 56 to 80 dBA. For both situations, predicted 1985 day-night noise levels, (L_{dn}), ranged from 59 to 85 dBA. For both conditions, estimated noise levels at all receptor locations exceeded the EPA-identified noise criteria requisite to protect against annoyance or interference with outdoor activities. The EPA-identified noise level to protect against hearing loss was exceeded at 21 of 104 receptor locations without the proposed mall and 25 of 104 receptor locations with it. The overall exceeding of the EPA-identified noise levels that were found is consistent with noise level predictions found in other studies of the outdoor noise environment of the United States.

This better have some hard facts behind it. Sounds like really soft statistics. Has Army Corps listened to the

Increases in noise levels due to operation of the proposed mall would be 3 dBA or less at all receptor locations. Based on the criteria for estimating average human perception of changes in noise levels, these

increases will be "barely perceptible." Based on the International Standards Organization (ISO) community response criteria, increase in noise levels for peak situations due to operation of the mall would probably not cause any response from the surrounding community (Appendix J, Noise).

Short-term noise impacts, hourly equivalent noise levels ($L_{eq(1)}$), were estimated both with and without the proposed mall. In both instances, the 1985 maximum $L_{eq(1)}$ values for each of the prediction sites ranged from 60 dBA to 85 dBA. Maximum increases in equivalent hourly noise levels, ($L_{eq(1)}$), for the 1985 build (as compared with the 1985 no-build) case were obtained by examining each hour of the day separately. With the exception of six sites -- one on Bishop Street, two on Washington Avenue, one on Valley Service Road, and two along the proposed Mall Drive -- the maximum increase in hourly equivalent noise levels at all prediction sites is 3 dBA or less, a barely perceptible increase. At the six sites, which are the main feeder streets to the mall, maximum increases in hourly equivalent noise levels range from 4 to 5 dBA, a noticeable but small increase. With the exception of the site on Bishop Street, these sites are located in nonresidential areas where the increases in hourly equivalent noise levels should constitute a relatively insignificant impact. The increase in noise levels on Bishop Street, while readily noticeable during some hours, is unlikely to generate significant community response according to the ISO criterion.

6.2 Construction Impacts

The level of noise impact during construction depends upon the characteristics of the equipment and activities involved, the construction schedule, and the location of potentially sensitive noise receptors. Construction impacts are not expected to be of major significance due to the location of the site (away and buffered from residential areas and adjacent to major feeder roads) and the limited duration of construction activities.

All Federal and State noise regulations would be complied with. In addition, every effort would be made to limit construction activities to weekdays between the hours of 7 a.m. and 9 p.m. Maximum increases in noise levels along the routes taken by construction vehicles would likely be perceived by community residents. Since there would not be a large number of truck trips, and the routes utilized are already high-volume thoroughfares, nuisance noise would be intermittent and short term. Such noise would occur for the length of the construction, but principally during site preparation. The use of low noise construction equipment and operational procedures would be utilized where feasible.

6.3 Secondary Development

Since no significant traffic impacts from secondary development are anticipated during the first few years of mall operation, no discernible

community noise impact is expected. There may be some significant traffic impacts from secondary development during the 10-15 year period following the opening of the proposed mall. Because these traffic impacts are not quantifiable at this time, however, the noise impacts cannot be quantified. Any probable secondary development would be on a smaller scale than the proposed project and thus no significant incremental increase in secondary development noise impacts are expected.

6.4 Cumulative Impacts

No significant traffic increases along the access routes to the proposed mall are expected from projects to be developed contemporaneously with the mall. Therefore, no significant cumulative impacts on community noise levels are anticipated. Potential for additional noise is possible, but not presently quantifiable.

7.0 UTILITIES

7.1 Water Supply

7.1.1 System Capacity

The projected average water demand for the proposed mall is 0.112 mgd and represents an increase in demand of 4.3 percent on the combined Reduced Rabbit Rock Service Areas, a 3.6 percent increase on the three North Haven service areas, and a 0.03 percent increase on the entire water system. Since the available supply for the two Rabbit Rock service areas is 9.7 mgd, with a current average use of 2.6 mgd, this leaves an excess average supply capacity of 7.1 mgd, of which the proposed mall is expected to utilize 1.6 percent. In addition, the authority's entire system has a dry weather average excess supply capacity of 32.8 mgd; therefore, the mall's demand would not affect the system's ability to service all customers, even during adverse weather conditions.

7.1.2 System Pressure

7.1.2.1 Domestic Supply

Based on tests performed on the system, operation of the proposed mall would not adversely affect water pressure in the town of North Haven.

7.1.2.2 Fire Flows

At present, existing service is dependent upon a system of pumps. To provide more reliable service in case of mechanical failure, the water company has proposed improvements that would connect the Reduced Rabbit Rock Service Area to the New Haven Low Service Area, providing the system with gravity feed through Lake Gaillard (which has a 13 billion gallon storage capacity).

7.1.3 Construction Impacts

Impacts associated with water service construction activities generally include some disruption of normal road traffic, dust and dirt generated by excavation and other earthmoving activities, and noise from construction equipment. These impacts are temporary and without major consequence. There will be no impacts to utilities by construction activities or any consequential impacts as a result of providing utilities to the mall site.

7.1.4 Secondary Development

Due to the excess capacity in the North Haven water supply, there should be no impacts from any secondary development that may be generated by the proposed mall.

7.1.5 Cumulative Impacts

Since current average supply capacity during periods of limited supply exceeds demand by 32.8 mgd, cumulative demands on the system would not be significant.

7.2 Sanitary Sewage Facilities

7.2.1 Sewerage

The addition of approximately 0.1 mgd of sewage to the town sewers from the proposed mall is less than the planned flow to be accommodated from industrially zoned land in the area, and as such is not expected to have a significant impact upon the collection system. The mall developer would be responsible for installing sewers along Valley Service Road and a forced main along Mall Drive to the Washington Avenue interceptor. With full development of all sewer sections, connection with the Elm Street interceptor could cause its free flow capacity to be exceeded. The interceptor would then operate with a slight surcharge of approximately 4 inches between Marlin Firearms and Bailey Road.

7.2.2 Treatment

The proposed mall would add 0.1 mgd of sewage to the current average flow treated at the town plant. Of the approximately 1.7 mgd treated, this represents a 6 percent increase in the flow to be processed and 2.2 percent of the process design capacity of the plant. This flow would cause a small decrease in the efficiency of the plant, resulting in an increase in organic pollutants discharged to the Quinnipiac River. The total organic load discharged from the town plant with the proposed mall would be significantly less than that allowed by the plant's dischage permit and, therefore, would not cause contravention of water quality standards in the Quinnipiac River. The period during which mall sewage would be processed by the existing plant prior to upgrading is from 1983

of waste include an attempt with Cheshire and Wallingford to build a resource recovery systems and participation in the Connecticut Resources Recovery Authority's program.

7.3.3 Secondary Development and Cumulative Impacts

These impacts would occur over an extended period of time and would not impact upon the need to find alternative solid waste disposal methods. For the long term, planning would include consideration of these growth factors.

7.4 Electrical Supply and Distribution

The peak electricity demand for the proposed mall is 11,000 kw which represents 0.8 percent of the United Illuminating Company's system capacity, leaving a reserve of 25.7 percent under simultaneous mall and system peak demand conditions. Considering available reserve capacity, and participation in the New England Power Pool network, there would be no impacts upon supply capacity due to the mall.

7.5 Telephone Service

No disruption in existing telephone service would occur in making the necessary mall connections and, according to Southern New England Telephone, adequate capacity exists to avoid impacts upon other users by this additional demand.

8.0 ECONOMICS AND LAND USE

8.1 Project Benefits - Increased Comparative Retailing

The proposed North Haven Mall would expand the range and variety of merchandise available by introducing into the market area a major department store not presently represented (G. Fox) and the expansion of three others (Sears, J.C. Penney, and Macy's). Other smaller establishments would locate in the proposed new regional mall, further adding to the range of goods and services available to area consumers. These retail outlets would attract new business to the region.

It could have the opposite effect as well. Why wasn't this mentioned?

In addition to generating benefits to the consuming public, the introduction into the market of a major new retail facility could enhance competition within the shoppers goods sector. According to the economic study (Appendix L, Economics and Land Use), increased competition could tend to reduce prices and stimulate the upgrading of existing facilities in order to compete more effectively with those in the proposed mall.

Without the proposed mall, much of the first-line comparison shopping done by area consumers would continue to be done in unconsolidated trips within and outside the SMSA, with consequent consumption of automobile fuel, loss of time, and reduced opportunity for comparative shopping.

to late 1988 or early 1989. A full sewage load from the proposed mall would not be expected until sometime in 1987-1988 when it would be in full operation.

7.2.3 Construction-Related Impacts

Provision for sewer service to the proposed mall would require early construction of parts of the town's planned sewerage system, including sewers along Valley Service Road, Mall Drive, and Washington Avenue, and a pump station near Mall Drive. Likely impacts include some temporary disruption of traffic, dust and dirt generated by construction equipment and activities, and noise from construction equipment.

7.2.4 Secondary Development and Cumulative Impacts

Planning for sewers and upgrading of the treatment plant in the town of North Haven has taken into account population growth and the development of vacant commercial, industrial, and residential properties. During the period before the treatment plant is upgraded, a 5 percent population growth is projected by these plans. This would result in a small increase in pollutant levels discharged into the river, but these levels would remain below State permit discharge limits.

7.3 Solid Waste

7.3.1 Collection

Collection of solid waste from the proposed mall would be performed by private carters, causing no impact upon the level of service provided by the town of North Haven to residential customers. The small number of trucks and the timing of collections would preclude traffic impacts. Impacts associated with noise from the collection and transportation of solid waste would not be significant since the mall site is isolated and well buffered from sensitive noise receptors.

7.3.2 Disposal

The proposed mall is expected to generate between 500 and 3,077 tons per year of solid waste, and, depending upon the level of recycling, would represent about 2-13 percent of the town's waste. Waste disposal is a town responsibility for all waste generators within the town. At first, disposal of the mall's waste may be at the town landfill or other landfills outside North Haven. Even with the planned expansion, the town landfill is expected to be filled by 1985. Full operation of the mall would not occur until 1985 or later, and maximum generation of solid waste is not expected until 1988. As a result, the mall would not impact significantly upon the need for North Haven to find alternative methods for solid waste disposal; that need already exists. In developing disposal options, the town would take into account it's potential future development, including the mall. Two of several options for the town's disposal

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Except for New Haven's potential retail development, there would be no regional focus for retailing strong enough to induce large retail purchases by local consumers or to serve the full breadth of the regional market. Analysis of regional shopping patterns indicates that the proposed mall would likely result in a reduction of approximately 12,000 vehicle miles per day of automobile travel. These energy savings would not be achieved without the mall.

Does this take into consideration extra car trips because no public transportation?

8.2 Retail Market Considerations and Impacts

Conflicting information has been presented as to whether or not the market area has a need for additional retailing, how much additional retailing, where it should be located (New Haven vs. North Haven), and the potential impacts a mall in North Haven would have on other competing retail centers in the New Haven SMSA.

The developer for the mall, Mall Properties, Inc., (Appendix L, Economics and Land Use), and the city of New Haven (Letter to Corps of Engineers, October 1, 1981; Halcyon Ltd., October, 1978; American City Corporation, February, 1981; and the HUD Community Impact Study, Appendix R) have indicated a need, or the presence of market support, for additional retail shopping of the type proposed in the mall. Reports commissioned by New Haven state that the market could support an additional 300,000-400,000 square feet of new retail space, (in comparison to the proposed 817,000 square feet for the mall). The city believes that such development should occur in downtown New Haven to compliment its existing 600,000-square-foot retail core. Further, it believes that the market cannot support new retail development beyond the 400,000 square feet without shifting existing retail regimes and injuring New Haven's downtown and some other retail centers. At this time, New Haven has made a commitment with the Rouse Company, a private national developer, to create 400,000 square feet of new retail space in the city's downtown area.

New Haven (Letter, October 1, 1981; Halcyon, October 1978) also indicates that should the mall be developed along with 300,000-400,000 square feet of retail in New Haven, this development would exceed by four times the shoppers goods expenditure potential to support it within the New Haven trade areas in 1980-1985.

A review of the above retailing information, however, is not possible at this time. Public and private interests opposing the mall have not presented any market analysis or evaluations as reference documentation. As such, this information is not available for public review and comment.

As described in Section III. H.2 and Appendix L, Economic and Land Use, the retail market analysis conducted for the North Haven Mall traced retail sales flows for shoppers goods within the metropolitan region, as well as sales inflows and outflows to the area, New Haven SMSA. Detailed expenditure-sales flows were identified for 19 individual municipalities and 20 major retail centers, forming a sales flow matrix of 380 data

cells. In order to forecast the retail impacts of the proposed mall, sales flows between each municipal area and each major store location point were considered to account for the competitive effect of the proposed mall in diverting sales from existing centers both inside and outside the market area. Changes in sales attraction between competitive retail centers were analyzed based on travel distance and time as well as the types of retail services offered.

The market analysis indicates that the proposed North Haven Mall would increase retail activity in the North Haven market area through greater sales retention of metropolitan area consumer expenditures and increased sales inflows from communities outside the metropolitan area. With the North Haven Mall, metropolitan area shoppers goods sales are expected to range from $426.9 million (under "zero percent growth" in real personal income) to $474.9 million (under "one percent real growth") by 1990--a 16 percent gain over the baseline supply condition under either assumption.

Under the "1 percent income growth" scenario, transfer sales (diverted from existing metropolitan areas) in 1990 would amount to $18.4 million, or about 4.5 percent, against total metropolitan area baseline sales. Under the "worst case" (no real per capita income growth and the highest transfers projected in this analysis), sales diverted from other metropolitan locations as a result of the proposed North Haven Mall could amount to $26.4 million annually by 1990. This would represent a 7.2 percent "transfer" of sales from the previously forecast metropolitan area baseline.

Such sales transfer impacts would likely differ among metropolitan area retail centers. Downtown New Haven, for example, would have to rely increasingly on a more constricted primary trade area to account for shoppers goods sales. Hamden, by contrast, would continue to share sales within the suburban tier as well as tapping other communities on the periphery in much the same fashion as that anticipated for the proposed mall.

According to the economic report (Appendix L, Economics and Land Use), it is estimated that the proposed mall would reduce Hamden's Magic Mile shoppers goods sales by approximately 8.5 percent ($4.7 million) in 1990, under the "worst-case" scenario, and $2.9 million or 5.3 percent assuming a "one percent annual income growth."

There would also be a decline in downtown New Haven's shoppers goods sales if the mall were built. For the "worst-case" situation, it was estimated that there would be a decline of 8.3 percent from its projected baseline sales in 1990, representing a transfer volume of $5.8 million. Assuming an annual income growth of one percent, the impact would shift lower to $3.5 million or 5.0 percent.

Other metropolitan locations are expected to experience a reduction in shoppers goods sales of about 6.5 percent ($15.9 million) from their baseline forecasts in 1990 under the "worst-case" acenario. With income growth at one percent, impacts are projected at approximately $12 million or 4.2 percent.

A review was made most recently of the advanced population reports for the 1980 census to check the above retail impact results which were based on previously used population estimates. Differences occur between the population estimates used previously and the new population counts. The impacts of the mall on sales at other retail areas would increase as a result. For the "worst case" situation--zero percent income growth to 1990--the New Haven impact of 8.3 percent would rise to about 9.5 percent. Corresponding changes for Hamden's Miracle Mile would be 9.8 percent, up from 8.5 percent; and for the balance of the metropolitan area the impact would increase to 7.0 percent, up from 6.5 percent.

In contrast to the impact figures presented above, retail impacts of the mall have also been variously estimated and presented in different reports. The Rouse Company's confidential market analysis, reported by New Haven (City of New Haven, October 1, 1981), showed that building the North Haven Mall could cause a diversion of sales ranging from 17.1 percent to 27.6 percent from the city's retail core.

New Haven has provided information in Table 17 which allows a comparison of their sales projections for the downtown retail core under various mall/downtown development scenarios. Should both downtown development and construction of the mall occur, New Haven indicated that its downtown would anticipate an 18.6 percent decline in sales when projected to 1986 when compared to downtown retail sales if the mall were not built (scenarios A and B). Further review of the chart also indicates that if both developments occur (scenario B) downtown sales levels for 1986 would be 10.3 percent greater than if no new development were to occur either in New Haven or North Haven (scenario C), and 13.9 percent above existing 1980 levels. Considering the effect of the mall in 1986 on downtown sales if there is no new downtown development, scenarios C and D are compared. The table indicates the mall could reduce sales in downtown New Haven by 13.2 percent.

The Halcyon report (Halcyon Ltd., 1978) projects a 16 percent drop in downtown sales from 1980 to 1985 if a regional mall were built and there was no new downtown development. With new downtown development and no new mall, sales in the city were projected to increase 28 percent. No estimate was projected for the situation in which both developments occur. The Regional Planning Agency of South Central Connecticut suggested similar declines in retail sales (Andrews, March 8, 1979).

Other sources of estimates appear to be reiterations of those described above. A preliminary assessment of the retail impacts of the mall on the city of New Haven was contained in a consultant's report

prepared for the U.S. Department of Housing and Urban Development under President Carter's Community Conservation Guidance policy. Developed in August of 1980, the document was limited to information available as of April of that year and did not consider the necessary analysis of sales inflows and outflows to the market area. Accordingly, this preliminary assessment recommended that the impact statement process give further consideration to the mall's potential to reduce New Haven's retail sales (Appendix R, Community Impact Study).

A review of the above impact estimates and projections from interests opposing the mall's development is not possible at this time. These sources did not provide market analysis in the reports, nor were such evaluations supplied as reference documentation. As such, background information is not available for public review and verification. From the information presented, it can be assumed that the extent of potential impacts cannot be precisely projected. Specific predictions of store closings or displacements are not possible because of the dynamics of competitive retailing, the potential for new developments, and the decisions of separate store owners. - Why is everything pro-mall quantifiable + predictable, but negative impacts not quantifiable?

yes, but there is at least ~~serious~~ questioning serious enough to warrent a second look (beyond what the developers paid for). The studies presented above are hardly frivolous and their warnings are grave.

Interests opposing the mall's development indicate that there would be a substantial economic effect. The city of New Haven is concerned that development of the mall would jeopardize their downtown revitalization efforts and it could induce closings of small downtown stores and could further injure marginal operations at the larger existing department stores. This would then degrade New Haven's downtown retail mix by affecting the clientele frequenting downtown, thereby causing further economic and social decline of the city.

For the town of North Haven itself, information in Appendix L indicates that some initial transfers from existing retail establishments may take place, but this would be offset by the addition of the mall's sales. The 1990 initial sales impacts may be on the order of 5-9 percent, against a townwide shoppers goods sales base of $13 to $17 million.

Subsequently, the proposed mall would increase the town's shoppers goods sales (net of transfers) by some $84 million on top of the $13 to $17 million baseline projections. The effect of a new mall on existing town stores could result in increased competition between some town and mall stores, with the potential for some small town stores being displaced or going out of business. Precise predictions of displacement are not possible because of the dynamics of competitive retailing and the personal and business decisions of each store owner. The potential exists that the few town stores providing goods similar to those to be offered at the proposed mall would seek space in the mall for a new establishment or as an expansion, or they may alter their retailing methods and sales techniques. In contrast, there is also the net-positive potential that retail establishments in the town would benefit from the increased consumer traffic generated by the mall.

1: This perspective reflects a very hardened bias and is unfeelingly deceiving: The point in question (i.e. the "worst case") is not limited to the loss of assessed property values — perhaps the loss of assessed values per se is least important, relative to the loss of influx of people, interest, capital, etc. if the properties lost happen to have together constituted, no matter how small their assessed dollar value, a downtown shopping core. The "worst case" is the train of consequenses contingent upon the loss not of any 0.3% of total assessed values, but of that 0.3% which constituted the heart of the city. Please note that the entirety of Yale is not even assessed: by the logic of appendix L, New Haven would suffer no less at all if Yale should dissolve completely! This logic is utterly biased in favor of Mall Properties Inc.

2: Reflects the same unfortunate and unscrupulous bias — "office development" cannot begin to recreate the happy influx of interest and public associated w/ a downtown retail center. It is not a question of dollar amounts of taxable property lost but of what sort of property will be lost and how to replace that in particular (e.g. Atlantic City, by this logic, →

TABLE 17
Total Center Sales in New Haven's Retail Core
(millions)

	1980	1986	1989
A.	61	102.4	122
B.	61	83.3	95.9
C.	61	73.1	80.2
D.	61	63.4	70.2

Note: All sales amounts are in current dollars for listed years.

Assumptions:

A. North Haven Mall is not built and Downtown does develop new retail space.
B. North Haven Mall is built and Downtown does develop new retail space.
C. North Haven Mall is not built and Downtown does not develop new retail space.
D. North Haven Mall is built and Downtown does not develop new retail space.

Source: City of New Haven, October 1, 1981

8.3 Fiscal Impacts

8.3.1 Local Impacts

The town of North Haven would receive significant fiscal benefits from construction and operation of the North Haven Mall. The proposed mall would produce local property tax revenues substantially in excess of town costs associated with services required by the mall. It is estimated that this "surplus" would be more than $1 million annually and, assuming a continuation of today's service levels, could have the effect of reducing the property tax rate by 6 percent townwide.

The town of North Haven would lose a major opportunity for economic growth and expansion of its tax base if the mall were not developed. This could be significant to the town, because examination of alternative uses for the proposed mall site suggested that little, if any, other development is likely to locate there. Also, the town's investment in the construction of the Valley Service Road in 1971, in order to open this part of its commercial/industrial corridor for development, would be dissipated if the mall were not constructed, unless other development could occur there.

8.3.2 Metropolitan Area Impacts

Retail sales diversions to the North Haven Mall may have limited impacts on the fiscal situation of other cities and towns in the metropolitan area to the extent that there would be a direct reduction of property values and associated tax revenues resulting from retail sales diversions. Assuming a "worst-case" condition, which would be a direct proportional decrease in property tax base, the average reduction for all affected communities would be approximately 0.3 percent of total assessed property values (Appendix L, Economics and Land Use). Any regional fiscal impacts associated with the operation of the North Haven Mall are not considered to be without consequence.

The small potential impacts forecast for the tax bases of various municipalities could be offset by moderate-sized individual developments. For example, under these "worst-case" assumptions, the potential loss to the city of New Haven of $3.7 million in taxable property could be offset by about 50,000 square feet of Class A office development.

8.4 Employment Impacts

8.4.1 Construction Impacts

Construction of the proposed mall would require nearly 11,000 person-months of labor and would generate on the order of $21.8 million in wages and salaries. These labor requirements would vary over the projected 36-month construction period. They are expected to peak from 13 to 25 after construction would begin, as well as in the last 7 months of construction.

It is estimated that 45 percent of construction-phase labor requirements would be filled by workers from the New Haven Labor Market Area. Information from the Connecticut Department of Labor indicates that the construction worker pool in the New Haven Labor Market Area is sufficient to fill these projected requirements. These positions would represent an infusion of about $9.8 million in new wages into the New Haven metropolitan area.

8.4.2 Impacts from Mall Operation

but, compared to unionized jobs at industry, rather poor quality jobs

The operations phase of the proposed mall would generate nearly 2,000 permanent jobs. Approximately 600 to 750 of these positions represent potential personnel transfers from existing metropolitan retail establishments. Assuming the "worst-case" in maximum diversions of shoppers good sales, new positions associated with the operations of the mall are projected at between 1,250 and 1,400 in 1990, with the potential reduction in retail jobs elsewhere of between 600 and 750.

Between 1,120 and 1,300 of the 2,000 positions are expected to be filled by residents of the New Haven metropolitan area, an increase of about 3 percent over existing employment in the wholesale and retail trade sectors and an increase in total regional employment of about 0.65 percent. Wages generated by these net new positions would be on the order of $8.2-$9.5 million annually (in 1980 dollars) and would increase the total wages paid out in the New Haven Labor Market Area by about 0.4 percent.

Is this a fair basis for determining minority employment in a white, suburban community?

The proposed mall would offer job opportunities for minority groups. Information obtained from several anchor stores reflects that approximately 15 percent of sales jobs on a nationwide basis are held by minority group members. Comparable figures for the northeast region of the country reflect higher percentages. Assuming a 15 percent figure, approximately 300 jobs of the 2,000 total would be filled by minority group members from the metropolitan New Haven area. There is the potential, however, that a significant proportion in the reduction of jobs in other areas (600-750) as a result of the mall's impact may affect minority workers from the downtown New Haven area.

What would be net gain/loss of employment for minorities?

8.4.3 Multiplier Effects

The injection of construction-related and mall operations wages into the metropolitan economy would generate additional economic activity as the result of a "multiplier effect." The construction phase of the proposed mall would have a one-time impact of $25.5 million in economic activity, beyond the direct wages paid out. Operation of the mall would result in a longer term economic benefit of between $20 and $24 million annually. This translates into a potential secondary impact of an additional 1,300 to 1,600 SMSA jobs.

8.5 Land Use Impacts

Development of the North Haven Mall carries with it the potential for affecting land use patterns in the immediate undeveloped area. Through secondary development or induced growth, the North Haven Mall will generate considerable consumer traffic along Washington Avenue, Valley Service Road, and Mall Drive. The mall's size would reinforce the area as a commercial corridor and improve its competitive position.

Within the physical constraints of development sites near the proposed mall site, it is projected (Appendix L, Economic and Land Use Impacts) that any ancillary retail development would likely take place along the east side of Valley Service Road and on sites along Washington Avenue that could be maximized with additional retail. There are also opportunities for small-scale office development along Valley Service Road on approximately 60 acres of land. It is reasonable to expect that about 40 percent of the land available would be developed with the first 10 years following the mall opening, with remaining land developed within the second 10-year period.

8.6 Cumulative Impacts

The only known and reasonably foreseeable proposals for supplying the metropolitan region with shoppers goods are the Rouse proposal for 400,000 square feet of retail in New Haven (Section 8.2), and a 20,000-square-foot increase in the retail floor area of the existing Connecticut Post Shopping Center in Milford, as well as a refurbishing of the center's existing space. Because the Connecticut Post's location, is outside the western edge of the North Haven Mall market region, it would serve an estimated 6 of that region's 14 municipalities. Through increased sales volumes, it is projected that Connecticut Post would draw an additional $1.6-$2.2 million in sales out of those towns that would otherwise have been spent at regional retail establishments, an impact of approximately 0.5 percent.

Although not foreseeable, some new shoppers goods retail space might be added in the form of new neighborhood or community centers in several dispersed locations. Perhaps some 250,000 square feet might be developed through 1990, an amount comparable to the additions in the 1970s. These new additions are likely to be located on the periphery of the region in communities most severely underserved by existing retail supply. Due to the typical constricted trade areas for neighborhood centers, impacts on New Haven's CBD would be minimal. Hamden's Magic Mile, given its discount store orientation and its draw from suburban communities, may be impacted.

9.0 COMMUNITY RESOURCES AND VISUAL QUALITY

9.1 Town Character

ACE Value judgment

ordering from pp. M, p. 26

In general, operation of the North Haven Mall should not negatively alter the basic character of the town. The proposed mall is located within the town's commercial/industrial corridor on appropriately zoned land. Its development is in conformance with, or does not contravene, any local, regional, or State land use policies or plans. In retrospect, the character of the town has developed and changed through history reflecting its colonial period, post-war booms, industrialization and its current suburban nature. The town appears to have projected its style, in part, through its goals and zoning which would permit a mall to be in character if developed within the town's commercial/industrial corridor.

olution is one ing; the mall ould be evolutionary

Scoping meetings and comments have shown that residents feel deeply about their beliefs that a mall would have either negative or positive affects for their community or lifestyle. This is a community issue and an area of prime public controversy between local residents. The preference of part of the community is to maintain their town without a mall and what they perceive to be the associated impacts. On the other hand, those in the town who favor the mall perceive it as beneficial to their needs and style, and that its presence would be acceptable in its proposed location. Numerous comments have been made to the Corps of Engineers indicating both preferences.

ias against ponents assessment

By and large, the nature of the positions and average salary of most mall employees would not be of the type and scale that would warrant relocation of people to the North Haven area. New management positions, however, might be lucrative enough to induce residential relocation. It has been estimated that of the 84 mall management positions anticipated, about 48 would be filled by persons currently residing outside the SMSA. Of that number, it is anticipated that between 12 and 16 employees would relocate to the town of North Haven. This number (and their families) can be accomodated without causing stress to the town's housing stock or community services and facilities.

9.2 Neighborhoods No mall = minimal

ording directly om App. M, p. 38

lue judgment!

The proposed mall site is situated in a commercial/industrial corridor such that potential interference with the town's neighborhoods would be minimal. Potential impacts represent a slight worsening of existing problems rather than the creation of new ones. -like the difference between a leaky faucet and a flooded cellar? Just a worsening of existing condition...

o Through ucks allowed n Leyden nd Spring ow.

Mall-related traffic would substantially increase traffic volumes along the town's major routes. Under existing conditions these roads are heavily used by commercial and business-generated traffic. With proposed modifications to improve traffic flows, however, mall traffic would not change the service levels of these roads except for segments of Clintonville Road, east of Bassett Road (in Clintonville), and Bishop Street

ias, in EIS, ne chart shows 51% more raffic on Bishop, west of Hartford Turnpike

no mention here of the truck traffic carrying the fill to the site. At every place traffic is mentioned in this EIS, this truck traffic is left out and we want it mentioned in the final EIS.

between the Wilbur Cross Parkway and State Street (in Allendale). In both instances, levels of service would be adequate to handle traffic flows (Appendix H, Transportation). There may be increased annoyance to adjacent areas which cannot be quantified, but the characteristics of neighborhoods are not anticipated to change from conditions expected in the future should a mall not be built. Some mall-related traffic can be expected to try to bypass busy thoroughfares by winding through some neighborhood streets. This is an unpredictable but natural tendency resulting from drivers' perceptions of saving time and convenience. Review of the town's roads and expected traffic conditions indicate that North Haven's neighborhoods contain a maze-like local street network, which would tend to discourage their use except by neighborhood residents. As a result, little traffic intrusion onto neighborhood streets is anticipated and no neighborhood is expected to change dramatically.

OMITS what would probably be the greater problem: the effects of local non-mall-related traffic trying to avoid mall-related congestion.

a little narrow - Town Residents in general know the roads and will use them to avoid congestion.

Because predicted pollutant concentrations would be below National Ambient Air Quality Standards, there would be no associated problems anticipated for local neighborhoods. With or without the mall, noise levels throughout the town in 1985 would not be perceptibly different on a 24-hour basis. However, from time to time during the 9-10 p.m. period, when the mall would close for the evening, the exodus of mall traffic may result in perceptible changes on Bishop Street, an area historically subject to relatively high noise levels, and on Washington Avenue near Wharton Brook State Park, which is not in use at that hour.

What does this mean? So we should assume that residents won't mind - or notice - more noise? Biased, judgmental statement.

Flooding associated with the Quinnipiac River would be reduced as a result of mall construction and the detention pond. The mall would not induce additional flooding problems beyond those presently experienced by some town residents.

9.3 Community Facilities

9.3.1 Schools

The proposed mall would generate a very modest population growth. The school system is not expected to be impacted.

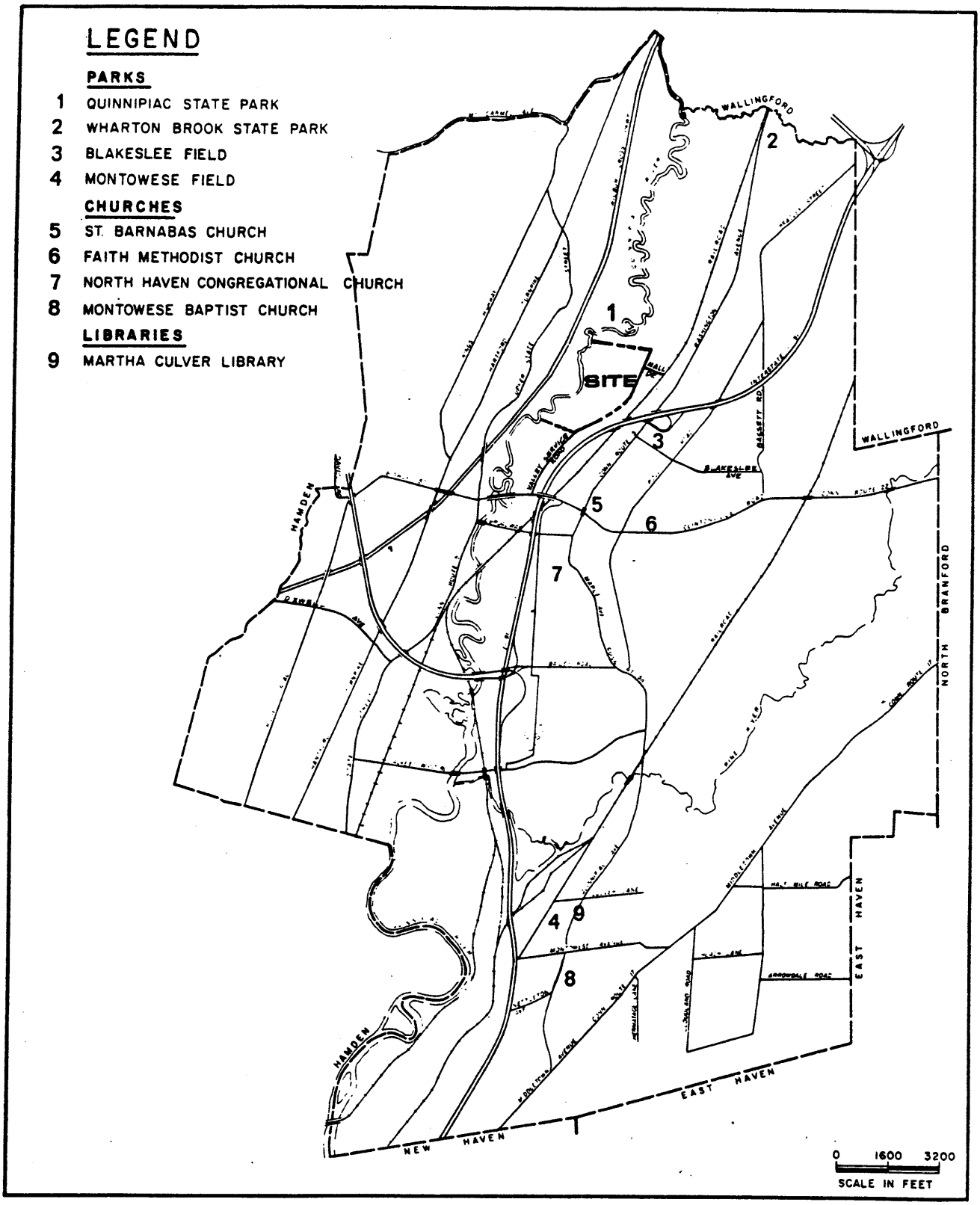
9.3.2 Libraries

The Martha Culver Library on Quinnipiac Avenue in Montowese may experience slightly higher noise and air pollutant levels as a result of mall-related traffic along that thoroughfare (Figure 18).

9.3.3 Churches

The proposed mall would be open on Sundays and mall-oriented traffic on the town's major routes could subject church congregates to some reduction in air quality and a slight increase in noise. Churches potentially affected include St. Barnabas, Faith Methodist, North Haven

This is a significant impact and it is in several different places in town.



NORTH HAVEN MALL

VALLEY SERVICE ROAD

NORTH HAVEN, CONNECTICUT

COMMUNITY FACILITIES IMPACT MAP

Figure 18

Source: Appendix M, Community and Visual Quality

Congregational, and Montowese Baptist. No impact-related disruptions to religious services are expected to occur (Figure 18).

9.3.4 Parks

Wharton Brook State Park, Montowese Field, and Blakeslee Field could experience some reduction in air and noise quality from mall-related traffic increases. Contravention of air quality standards is not expected. Views from Quinnipiac State Park would not be seriously harmed by mall construction, since the proposed mall site is at the same ground level as the park and it should be shielded by a wooded berm (Figure 18).

9.3.5 Utilities

The developer would pay for those portions of the sewer collection system needed to service the mall and other portions along Valley Service Road. The community would benefit since these elements could later be used by other activities.

The water company is planning to develop a new gravity flow water system. A substantial portion of the expenditures would be paid for by the developer. This improvement would benefit the entire service area by increasing storage capacity and introducing a more reliable system. Mall development would not affect utility service to the town's residents.

9.4 Community Services

9.4.1 Police

Will require how often?

The proposed mall would employ its own security force. While the mall and its associated patrons and employees may require some additional police services from time to time, it is not expected that additional manpower would be required. Should special details from North Haven's police force be needed, it would be arranged through the town and paid for by the mall. Information about the potential impacts on North Haven's police force have shown effects ranging from the need for no additional police personnel on the force to the potential need for four additional police officers (Appendix M, Community and Visual Quality; League of Women Voters of North Haven, April 1980).

9.4.2 Fire

With the existing internal fire protection system, and the experience at other malls, the town does not foresee a need for additional firemen or equipment as a result of mall construction or operation.

9.4.3 Social Services

It is unlikely that there would be any strain on existing services since projected population growth is nominal. Should the town desire, it

could use the expected revenue surplus from the mall to improve the quality and quantity of services presently being provided.

9.5 Sociological Impacts

A review of several malls in other areas that have apparent similarities to the proposed mall in their site location, in the design of the mall and in local community characteristics, indicated that little sociological impact is expected. Malls often serve as focal points at which both the elderly and teenagers tend to gather and socialize. At present, lack of organized activities for North Haven teenagers has resulted in some "hanging out" at the town's recreation center, the roller skating rink, and some of the fast-food restaurants along Washington Avenue. With development of the proposed mall, teenagers can be expected to use it frequently since many may be employed there part-time, while others will go there to socialize, "sightsee," window-shop and purchase. Unusual or annoying congregating is not expected to increase due to a mall's presence, since loitering would be actively discouraged by the mall's own security force. The amount of shoplifting and breaking into parked cars can be expected to be similar to that of other mall facilities situated in like communities. This should have no effect on the community itself, where no additional crime outside the shopping facility is anticipated as a result of developing the proposed mall. The malls security force would also be expected to discourage shoplifting and other forms of criminal behavior. VAGUE. This force will not have the power to arrest. Not even the North Haven police have been able to curtail hanging out in e.g. Roller Haven's lot. The Mall will be more remote.

We would love to know how to tell when teenagers are hanging out vs. socializing. When they go to the mall, they will be "socializing" (good) but at rec center they will be "hanging out" (naughty)?

The Mall would be part of the community, like it or not.

Though many concerns were raised at public scoping sessions, no evidence appears in the literature, or has been submitted by community interests, to indicate that developing a mall would alter the "character" of a community by affecting the values integrated within the family institution. There is no evidence that the presence of a mall would have a significant effect on directing and shaping the social values and behaviors of individual members of a community.

9.6 Visual Quality

Views of the site would be limited to less than 30 homes, located along Kings Highway and the Hartford Turnpike (Figure 16). In the present view from these locations, the site (2,000 to 4,000 feet away) appears as a large open and generally green area during the growing seasons. Construction of the proposed mall would change this view across the site to one that would be characterized by a large complex of white stone buildings and the blacktop parking area, which would be viewed between the proposed mall and Valley Service Road. Since the roof-line elevation would be approximately 50 feet (MSL), it is likely that the roof-line would also be viewed at a level below the horizon, since the viewing properties are located 110 to 200 feet above the mall site. The proposed mall would be in view within a range of a 45° horizontal angle from the affected locations. It would be contained within the vista of the rest of the valley beyond it. The mall should not intrude on the vista of the

horizon from the houses that would have the mall in view, and it would not cast a shadow on any residence or other business.

The proposed mall would also be seen from southbound lanes of Interstate 91 and the Amtrak railroad lines. Passengers along these routes would have a view of the mall for less than 20 to 30 seconds. This impact would be of short duration and would not be obtrusive or inconsistent with other views.

Residents west of the mall site (Kings Highway and Upper State Street) may be affected by an increase in night sky brightness and "horizon glow" as a result of mall parking lights. Their distance and higher elevation should help to diminish these effects. In addition, light shields would be attached to lighting fixtures to minimize light spillage, which might affect sensitive areas. Also parking lot lighting would be reduced by 75 percent after 11 p.m.

9.7 Construction Impacts

Construction impacts associated with the proposed mall are of a short-term nature. The site is buffered from residential and commercial areas so that onsite construction should have little impact on town residents. Traffic control measures, e.g., flagmen, would be used routinely to ensure that mall-related traffic disruptions and truck activity do not impede the provision of emergency services.

no one is worried about residential secondary devel. Unfair to put this as topic sentence. This is the true concern, it should be first.

9.8 Secondary Development

An insignificant amount of residential secondary development may be generated as a result of the mall. There is sufficient housing as well as appropriately zoned vacant land available to accommodate this growth. Any secondary office or retail development is expected to locate on vacant sites within the existing commercial/industrial corridor, primarily to fill in along Washington Avenue or on the east side of Valley Service Road. Since the scale would be small and the timing would be long term, the town should have no difficulty accommodating this growth in accordance with their plans and zoning.

Not proven scale would be small. If Army corps notes themselves, you will find it is always substantial in growing acreage.

9.9 Cumulative Impacts

Economic analyses projected the generation of 3,000 jobs in the study area over the next 20 years without the mall. It was assumed that this number included development of two industrial parcels in North Haven -- Bailey Road and Terminal Road -- which would occur in the near future, and that provision for the services and facilities required by these people would be incorporated into the town's planning process.

10.0 HISTORICAL AND ARCHAEOLOGICAL RESOURCES

10.1 Historical and Historic Archaeological Resources

No historic or historic archaeological impacts are anticipated at the proposed mall site as a result of constructing a mall, or in any of the areas to be modified for traffic. The proposed widening of Bishop Street (potential North Haven Bridge Historic District) by the Connecticut Department of Transportation, which would be warranted even without mall construction, would assist in carrying mall-related traffic. Projected traffic increases generated by the mall should not cause significant increases in air pollution and noise levels along the street.

10.2 Prehistoric Archaeological Resources

Based on the Criteria of Adverse Effect contained in the Advisory Council for Historic Preservation Procedures for the Protection of Cultural Resources (36 CFR 800.3(b)), the Corps of Engineers has determined that the proposed project may adversely affect three sites potentially eligibile for listing on the National Register. Construction-related impacts due to placement of fill next to these sites or the direct placement of fill and/or parking facilities over these areas could either damage artifacts or compact the soil enough to destroy stratigraphic data.

As a mitigative measure a Memorandum of Agreement plan would be developed by the Corps of Engineers, the State Historic Preservation Officer, the Advisory Council for Historic Preservation, and the developer of the mall. This would outline a scientific excavation program to be carried out prior to any mall construction, allowing appropriate archaeological data to be obtained for study.

10.3 Secondary Development

The areas along Washington Avenue that might experience potential new development, and the area along the east side of Valley Service Road projected for new development, have been disturbed through past construction efforts and the likelihood of finding significant historical or archaeological sites or artifacts is minimal.

10.4 Cumulative Impacts

No cumulative impacts resulting from construction or operation of the proposed mall are expected in relation to historical, architectural, cultural, or archaeological resources. The cumulative projected traffic increases on Bishop Street, with the incremental increases generated by the proposed mall, would not have a significant impact on the small portion of the potential North Haven Bridge Historic District that fronts on Bishop Street.

What would have "significant" impact if near-destruction of neighborhood, noise, traffic + pollution increase won't?

11.0 ENERGY

11.1 Onsite Energy Consumption

Energy would be consumed at the proposed mall by burning natural gas and fuel oil, and by purchasing electricity for the purposes of heating, air conditioning, lighting, and other building functions. The mall would be composed of separately owned and operated buildings. Each building would have its own energy systems and the energy demands for each building have been estimated separately. Table 18 shows estimated peak energy demands and Table 19 shows estimated annual energy consumption for space heating, air conditioning, domestic hot water heating, and electricity for each structure. wrong

compared to what?

Energy consumption from the proposed mall would have an insignificant impact on energy consumption in the area. The quantities of oil and natural gas that would be consumed represent a relatively insignificant energy impact on local fuel supplies: total consumption would be equivalent to the quantity consumed by approximately 100 homes. Mall Properties, Inc., would consider applying additional energy conservation methods in the design and operation of the mall structures should the proposed mall reach a design stage.

Army Corps— please do research + get correct figures

Electricity used by the proposed mall would not affect electrical supplies within the New Haven or North Haven area since it represents a very small peak load (11,520 kw) when compared to the total peak generating capacity of United Illuminating (1,299,360 kw) and the New England Power Pool. There is sufficient excess capacity to handle the additional load imposed by the proposed mall (United Illuminating, August/September 1981).

11.2 Alternative Energy Systems

At the present time no alternative energy systems (solar, wind, solid waste, etc.) are planned for the North Haven Mall. None of these systems are financially feasible for commercial application at a major shopping mall in the northeastern United States at the present time. Mall Properties, Inc., however, would consider including additional energy conservation in the design and operation of the mall structures should the proposed mall reach a design stage.

why not?

11.3 Transportation Energy Consumption

Fuel consumption for transportation for shopping purposes would decrease by approximately 535 gallons per day in the market area as the result of operation of the proposed mall. This would be the direct result of reductions in the number of trips made in the market area as shopping trips would be consolidated and the trip length would be shortened because of the central location for the proposed mall.

his sounds so sure. Do statistics ensure this? which ones?

11.4 Construction Energy Consumption

Construction energy consumption represents the quantity of energy required to manufacture, transport, and place construction material within

TABLE 18

PEAK ENERGY DEMAND FOR THE
NORTH HAVEN MALL COMPLEX

BUILDING	SPACE HEATING (BTU/HR)	DOMESTIC HOT WATER HEATING (BTU/Day)	AIR CONDITIONING (tons)	ELECTRICITY (kw)
Mall Stores	3,700,000	331,255	1,910	8,500
R.H. Macy's	5,500,000	458,150	300	700
Sears	4,000,000	331,255	300	700
G. Fox	5,500,000	458,150	350	720
J.C. Penney	4,000,000	331,255	380	900

Source: Appendix P, Energy

Detailed energy demand information has not yet been estimated for all buildings, and as such some estimates were based on floor areas and comparisons with similar-type buildings.

TABLE 19

ANNUAL ENERGY CONSUMPTION FOR THE
NORTH HAVEN MALL COMPLEX

BUILDING	SPACE HEATING (in billion BTU)	DOMESTIC HOT WATER HEATING (in million BTU)	AIR CONDITIONING (kwh)	ELECTRICITY (kwh)
Mall Stores	2.3	119.5	4,494,000	18,000,000
R.H. Macy's	1.7	334.2	700,000	4,500,000
Sears	3.5	334.2	600,000	3,000,000
G. Fox	1.7	334.2	700,000	2,800,000
J.C.Penney	3.6	334.2	600,000	2,250,000

electricity underestimated

Source: Appendix P, Energy

Detailed energy information has not been estimated for all buildings, and as such some estimates were based on floor areas and comparisons with similar-type buildings.

Amount to satisfy the
average energy needs
of 200 single family homes for a year.

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a structure. This quantity of energy is commonly referred to as the embodied energy of the material. The total construction energy consumption for the proposed mall was estimated to be between 20 and 26 billion BTUs of embodied energy. Energy sources required to construct the mall would be highly diversified. As a result, embodied energy consumption would have an insignificant impact on local energy supplies. Local energy requirements for construction would constitute less than 0.5 percent of total embodied energy requirements.

Two other alternatives ① It is zoned for industry No Haven is developing again ② Trees vegatation and animals would thrive

B. Environmental Consequences of the No-Action Alternative

1.0 Topography, Geology, Soils, and Ground Water

As previously discussed, the most likely alternative use of the proposed site, and the only foreseeable one, would be the continuation of the sand quarrying activity.

Continued mining would result in the removal of existing vegetation and soils, thus increasing the erosion potential of the site and the quantity of sediment contributed to the Quinnipiac River in runoff. Mining of additional materials would also result in topographic alterations which would continue to reduce the surface elevations beyond existing conditions.

Existing recreational use of the site, although unauthorized, includes target shooting, limited fishing, and trailbiking. Trailbiking would continue to compact the topsoil and limit the establishment and maintenance of vegetation and wildlife habitat, and would contribute to increase erosion potential of the site. Continuation of target shooting and fishing would have no effect on the site.

if it were not developed Ponds prevent mining trailbiking has not prevented ground cover— Note your own botany list.

2.0 Surface Water and Water Quality

Continued quarrying would expand the existing ponds and contribute to their turbidity. Thus, runoff entering the Quinnipiac River from the site would result in a higher contribution of suspended sediments than would occur subsequent to the construction and operation of the proposed mall.

3.0 Vegetation, Wildlife and Wetlands

Vegetation impacts associated with continued quarrying activity include the loss of wetland vegetation and wildlife habitat, particularly in shrub swamp and marsh communities. This loss would effectively displace the majority of wildlife species presently using the central and southern portions of the site.

No mention that the Town owned land would not be available for quarrying Rice's land is only land that might be used.

4.0 Archaeological Resources

If quarrying were to take place in the relatively undisturbed portions of the site to the north or in the vicinity of the proposed Mall

the Town
the land owners
certainly would care
to have these excavated
Have you asked? Is Eminant
Domain possible to protect sites

Drive, three sites potentially eligible for nomination to the National Register of Historic Places may be adversely affected without any form of mitigation.

If you will look at plans submitted to DOT you find developers never considered public transportation access, other dev. is possible Penn Cent Bailey Rd

5.0 Socioeconomic Impacts

The no-action alternative would result in lost opportunity for North Haven retail market to realize the economic growth and consumer benefits associated with the proposed mall. At the regional level, the potential for recapturing a substantial portion of current retail sales leakage would be lost, along with the employment opportunities generated by expanded retail activities. Residents of the region would forego consumer benefits derived from having an expanded range of retail services available, a heightened level of competition among area retailers, and better transportation access to outlets for shoppers goods.

The town of North Haven, which would derive substantial tax revenues from the proposed mall, would maintain its present tax base and not realize new economic benefits of development. It would have no foreseeable opportunity for an alternative site development which would meet its long-term planning and investment strategies to maintain economic development and fiscal stability. — why not? Developable land is more and more valuable.

Proposals for regional shopping center facilities at other locations may emerge. Several locations including downtown New Haven, and other locales to the southwest, e.g., Milford and Orange, would likely represent the most viable alternatives. In these cases, retail coverage in the region would increase, but would not provide full market coverage to regional residents in a substantial portion of the North Haven Mall market area. New shopping facilities to the southwest could capture portions of the New Haven metropolitan retail market and thus shift sales away from existing retail centers in the SMSA, including the New Haven CBD.

Several socioeconomic benefits of the no-action alternative relate to maintaining existing conditions for which area North Haven residents are accustomed. This would include keeping the existing traffic conditions and its related issues as they exist, the retail mix and potential store closings in North Haven unchanged, and the economic competition of the proposed mall and its impact on other retail areas unaffected. Perhaps the greatest benefit would be to the New Haven CBD where present plans and schedules for revitalization would not be affected. In this case, the development for the new downtown retail core could proceed as the city now envisions without a competitive challenge of a new regional suburban mall. The no-action alternative would not cause a loss of retail sales of between 8.5 and 27 percent (range of predicted maximum losses with the proposed mall), and would not affect the retail mix or any store closings that would occur as a result of New Haven's plans to rebuild and revitalize its downtown area.

V. LIST OF PREPARERS AND CONTRIBUTORS
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Organization and Name	Professional Discipline	Education	Experience	Contribution
New England Division, Army Corps of Engineers				
Robert J. DeSista	Regional Planner	B.A. Geography	Land Use Planner, 3 years Planning Board, 4 years Regulatory Project Manager, 3.5 years , Supervisor, Regulatory Branch+, Operations Division, CE 8 years*	Regulatory Activity Project Manager
B.E. Barrett	Ecologist	Ph.D Zoology M.S. Zoology B.A. Zoology	Fisheries Research, 3 years Fisheries Management, 3 years Supervisor, Environmental Studies+, Planning Division, CE 7 years*	EIS Project Manager
Robert E. Adler	Civil Environmental Engineer	M.S. Marine Sciences	Civil Engineering, 1.5 years Engineering Consultant, 2 yrs., Environmental Studies, Planning Div., CE 6 yrs.,+*	EIS Preparation and Coordination
Charles B. Freeman	Landscape Architect, L.A.	M.L.A. (Master of Landscape Architecture) B.A. Biology	Division Landscape Architect+ Planning Div., CE 6 years*	EIS Preparation
John Wilson	Archaeologist	M.A. Archaeology B.A. Archaeology	Staff Archaeologist, 1 year Archaeologist Consultant, 3 years, Division Archaeologist+, Planning Division, CE 3.5 years*	EIS Preparation
Janet O'Neill	Biologist-Environmental Resource Specialist	M.S. Candidate (Environmental Health Engineering) B.S. Fisheries Biology	Assistant Fisheries Biologist, 2 years, Environmental Resource Specialist, Regulatory Branch, Operations Division, CE 4 yrs*	EIS Preparation
Department of Interior, U.S. Fish and Wildlife Service (Cooperating Agency)				
Robert Schierer				Fish and Wildlife Coordination Report and Habitat Evaluation Procedures Report

+Current Position
*Total years with Corps of Engineers (CE)

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The North Haven Conservation Commission also supported the goal of Class B for the Quinnipiac River. Examination of past records will show this. Minutes of meetings, letters to DEP etc.

In Appendix A p 3 Regional Groundwater Resource "~~In relation to other~~ Sec 1.4 Regional Soils states two main soil types, both closely related to parent bedrock (till soils & stratified drift soils) have potential to pollute ground water 1.5 Regional Groundwater Resources states that location of stratified drift generally defines the extent of the aquifer and that stratified drift deposits associated with the Quinnipiac River Valley extend from New Haven to Meriden and from Cheshire to Plainville.

Appendix B p. 17 vi Admit some connection from recharge areas to aquifer, but minimize effect

Appendix C p. 19 3.2.1 Literature Sources of Runoff Quality Data "Specific data for mall type of land use & local data are sparse"

P2 1/12

March 21, 1982

Robert Adler, Division Engineer
New England Division, U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Re: Proposed North Haven, CT Shopping Mall (NEDPL-IP)
Comments on Draft EIS and 404 Review

Dear Mr. Adler:

Enclosed is a copy of a letter I wrote which recently appeared in both the Advisor and the North Haven Post. I request that the Army Corps include in its final EIS responses to the four criticisms of the Draft EIS raised in this letter. Specifically:

1. Please re-assess your assumption of an unmet public need for retail services in view of declining population trends shown in the 1980 Census figures and declines in consumer spending ability pointed to by countless national statistics.

2. Please assess the impact on existing area merchants of declines in sales of 8.5 to 13.2 percent. What percentage of local businesses might be forced to close or to reduce the size of their facilities?

3. Please thoroughly assess the impacts and benefits of alternative uses for the mall site including office and light industry and compare these to the impacts and benefits of a mall. Please re-assess your assumption in the Draft EIS that this site is not suitable for industrial/office use in view of the two new industrial parks being built nearby on similar sites in North Haven.

4. Please note in the final EIS that documents refuting the developer's studies were not included in the Draft EIS and evaluate the adequacy of holding a public comment period on the draft without making this information available to the public. Please include references to the critiques of the developer's studies and your responses to these critiques in the final EIS.

I reiterate my opposition to the proposed North Haven mall. I wish to remind the Army Corps that it is the only body with a mandate to examine the broad and long-term sociological, environmental, ecological, and economic impacts of this proposal. I urge the Army Corps to shoulder this responsibility and to deny the 404 permit to the developer.

Thank you for your consideration in this matter.

Sincerely,

Sandra Aivano

Sandra Aivano
145 Bayard Avenue
North Haven, CT 06518

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Shortcomings in Army Corp. of Engineer Report Concerning the Mall

March 1, 1982

To the Editor:

The Army Corps of Engineers recently released its draft environmental impact study (DEIS) on the proposed North Haven mall. I would like to point out some serious shortcomings in this document:

1. The DEIS is based on the premise that there is a "currently unmet public need for retail services" in the New Haven area (Summary, p. 4). Given recent declining population trends and reductions in consumer spending ability, the need for additional shopping facilities must now be questioned.

2. The study states that the proposed mall would result in "the reduction in retail sales at other major retail areas . . . projected to range from 8.5 to 13.2 percent of existing sales volumes" (Summary, p.5), but does not address what declines of this magnitude could mean for area merchants. Declines in sales of up to 13.2 percent could be significant enough to force many existing stores to close.

3. Alternative uses for the proposed mall site are dismissed without serious consideration (II.B pp. 6-9). The study implies that if the site were not used for a mall, it could not be used at all. The comparative benefits of using the site for light industry or office buildings rather than for a mall are not investigated.

4. The DEIS virtually ignores a large volume of literature submitted to the Army Corps calling into question the studies commissioned by the mall developer. This literature includes data from experts qualified to evaluate the developer's studies. While complete copies of the developer's studies are included as lengthy appendices to the DEIS, the studies presenting data against the mall are not even mentioned in a bibliography.

As a North Haven resident concerned about the town's future, I am disappointed to find these inadequacies in the DEIS and hope that the Army Corps responds to these shortcomings before making their final environmental impact decision.

Sincerely,
Sandra Aivano
North Haven

speaking for myself

My name is Rev. William J. Baugh, 11 Windsor Rd E. North Haven. I am the minority Selectman for North Haven. ~~[illegible]~~ ~~[illegible]~~ I have serious questions about the bias built into the draft statement. There is no evidence that any consideration was given to the material submitted that called the studies into question. ~~Rather broad generalizations were used~~. I urge you to respond to and consider this ~~inadequacies~~ material.

Perhaps the most blatant is the Gladstone report on Economics and Land Use. I believe the association ~~of~~ between the Gladstone Company and the Mall Developers make this ~~[illegible]~~ report ~~[illegible]~~ questionable at best. It is unclear to me why the Corps elected to use this and would ask that they respond publically to this question.

The report projects the loss of retail sales at other areas to be between 8.5 to 13.2 percent of existing sales. With a mall the size of the ~~projected~~ proposed one I am certain that many stores will suffer much more. I ~~believe~~ call on the Corps to make a more thorough study of the specific impact on stores, particularly in North Haven. The town of North Haven owes some consideration to small business people who have invested their life and savings in the town. If the town can offer to subsidize Herb Pearce and Donald Lippencott to the extent potentially of 1 1/4 million dollars and I supported this then I believe it ethically owes ~~[illegible]~~ its consideration to the small, struggling business. ~~This will kill many of them who cannot afford to relocate in the mall.~~

The ~~traffic~~ Air quality report was built on ~~political~~ dubious assumptions. There is no clean air bill for all cars. I doubt people will soon give up their ~~leaded cars~~ cars using leaded gasoline as the report assumes. ~~I have one that is eight years old and I plan to keep it for a long, long time. And [illegible] if the difference in price between leaded and unleaded gas continues to be 5-10¢~~

~~per gallon I suspect I will look for another one.~~

I would like to see a study on the long-term financial and sociological effects of malls on communities. In a survey of those around the West Farms Mall, ~~most people did not~~ not one person ~~say they~~ perceived it as an economic benefit. In fact, most made comments such as, "This is no longer a residential community." In the period since the Mall was built taxes went up 11-13% despite the kind of optimism we hear in North Haven.

The ~~[illegible]~~ report estimates (IV-25) that the "net 'surplus' would be more than 1 million annually and this would have the effect of reducing the property tax rate by 6 percent townwide. But they admit that this is assuming a continuation of today's service levels. I believe that is an erroneous assumption. North Haven will need more police. One report estimates 4 new police officers. How many will the Mall hire? And how many will the Fire Department need. Will this necessitate an end to our historic heavy reliance on volunteer fire services and a dramatic increase in numbers in the Fire Service.

The fundamental question is "Is the mall worth the price? Assuming their six percent figure is right it would mean that with the new reassessment it will cost me $100-$120. That is a small price to pay to insure the present quality of North Haven life.

Rev. William J. Bauf
Minority Selectman
Town of North Haven

P4 476

STATEMENT

PRESENTED AT THE PUBLIC HEARING

OF MARCH 16, 1982

AT ORCHARD HILL JUNIOR HIGH SCHOOL

NORTH HAVEN, CONNECTICUT

IN THE MATTER OF

PERMIT APPLICATION OF MALL PROPERTIES, INC. (NEDOD R-13-79-561)

TO

THE NEW ENGLAND DIVISION - U.S. ARMY CORPS OF ENGINEERS

BY

DR. M.H. BECHIR

My name is Hamdy Bechir of 35 Sheffield Road in North Haven. I have been a registered professional engineer, for more than 16 years, and I hold a Doctor of Science Degree in Environmental Engineering from MIT. Currently, I am a professor of civil and environmental engineering at the University of New Haven. The statement I am about to give should in no way be construed as representing the position of the University of New Haven or injecting the University of New Haven as part of this hearing. However, this statement represents my professional and my personal opinion as a resident of North Haven.

It also represents my considered opinion as the former chairman of the Inland Wetlands Commission of the Town of North Haven. I was the chairman of the Commission at the time the Mall application was considered. I can state unequivocally that the most important and compelling factor, during the deliberations on the subject application was the maximum preservation and protection of the wetlands. Ten dedicated commissioners and alternates spent considerable time and effort understanding the many sensitive needs and evaluating the myriad of ecological issues associated with the project. The almost unanimous decision of granting the Inland Wetlands permit to the Applicant was mainly a result of the Commission's strong belief that a single large development represents the most desirable use of this site and affords the greatest opportunity for wetlands protection.

Strict conditions and safeguards such as the construction of a dike, requiring porous pavement, perforated drainage pipes and retention pond etc., are reasonable permit conditions when imposed on a large developer, but on the other hand, these conditions become harsh, unreasonable and arbitrary if they are imposed on 55 or 60 small developers, each developing a two acre portion of the same site.

I completely support the conclusions of the draft of the environmental impact statement prepared by the Corps and I strongly urge that the permit be issued. The draft EIS and the studies performed by the Corps and other professionals have vindicated my earlier statements based on preliminary studies as to the minor and insignificant effects that this development will have on flooding within the Quinnipiac River Valley and that the detention pond will have more a beneficial rather than adverse impact on the downstream areas during flooding conditions.

It is to me ironic that the purported environmental degradation of the water quality of the Quinnipiac River was used by the City of New Haven as its initial reason for opposition to the Mall when the same City of New Haven by its conscious and deliberate act has been preventing and delaying the upgrading of two sewage treatment plants and as a result these two plants continue to discharge combined sewage and partially treated sewage in amounts approaching 30 million gallons per day during dry weather and 150 million gallons per day during wet weather into the mouth of the Quinnipiac River. The pollution load from these discharges is 19 tons per day in dry weather increasing to 70 tons per day when it rains.

The tide carries that pollution upstream to the mall site. Rightfully, North Haven and Mall Properties should be the party objecting to the pollution of the River from New Haven's sewage discharge. Isn't it also more ironic that the City of New Haven is using the protection of the wetlands as another reason for their opposition to the Mall when that same City of New Haven which casts itself in the role of the protector of North Haven wetlands, refused to upgrade the same two treatment plants and fights EPA in court for the past several years trying to force EPA to let them fill 33 acres of the wetlands in the harbor upon which to build the expanded treatment plant? I wonder if the wetlands of the harbor are less valuable and do not need as much protection as the wetlands of North Haven? I also wonder why the environmental groups are not up in arms about the destruction of the New Haven wetlands? The City of New Haven's contentions about flooding, deteriorations of water quality and wetlands destruction are without technical merit. The tentative decision to issue the permit to construct the Mall should be confirmed. In my opinion, the City of New Haven should redirect its energy and resources to take advantage of the great opportunities afforded the City due to the presence of Yale, the Medical Centers, and the Arts and Theaters. One medium size facility associated with any of these institutions would more than make up the possible loss in retail sales due to the construction of the North Haven Mall.

The purported economic devastation of downtown New Haven as justification for the denial of the permit in question strongly suggests to me, questions of the constitutionality of a government agency protecting and guaranteeing the "sales territory" of a local municipality and/or private retail enterprises.

The beneficial impacts of this project such as the creation of 1250 to 1400 permanent jobs, 21 million dollars in annual wages and $24.5 million in one time regional economic activity will benefit New Haven, North Haven, as well as the entire region. The community that would derive the most benefit from this proposal next to North Haven is the City of New Haven. Again, I am in favor of the Corps granting a permit to the Applicant for the mall construction.

P5 481

106 Kings Highway
North Haven, Connecticut 06473
March 22, 1982

Mr. Robert DeSista
Department of the Army
New England Division
Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. DeSista:

The South Central Regional Planning Agency, a Connecticut State Agency, submitted a comprehensive report about August or September of 1980 to the residents of the state on the concentration of carbon monoxide and other harmful emissions from automobiles, emphasizing the hazardous effects of these products. The report states that carbon monoxide levels in areas of North Haven are higher than federal government maximum standards. Since 1980 the number of cars has increased substantially so that pollution from cars is even greater today than two years ago.

Enclosed is a copy of an article I wrote and published in the area Journal Courier newspaper on the pollution due to cars in the North Haven area. The proposed mall would augment the pollution substantially.

A copy of the South Central Regional Planning Agency report can be obtained from the State of Connecticut.

Please stop the construction of the North Haven Mall to prevent this added pollution from happening (50,000 more cars per day).

Also, please include this letter, the State Agency report, and my published article in your final report when completed by the Army Corps of Engineers' Environmental Impact Statement (EIS) on the North Haven proposed mall.

Thank you.

Sincerely,

Kenneth R. Brody

Kenneth R. Brody
Research Biochemist and
Resident of North Haven

KRB:m
Enc.

1982

Journal-Courier SPEAKOUT
WEDNESDAY, SEPTEMBER 17, 1980

Wanted: local pollution fighters

The South Central Regional Planning Agency informs us that the air at eight intersections in North Haven has levels of carbon monoxide higher than federal standards. Route 22 and State Street is one of them. The high concentrations make breathing hazardous. Add to this the current pollution of the air by "secrets" generated by the Upjohn Co., and the additional pollution of the air by the higher volume of traffic engendered by the proposed mall, and we have a firm foundaton and basis for some very serious health problems here.

Unfortunately, our smiling first selectman, Walter Gawrych, does not take the initiative in organizing the elected and appointed town officials to prohibit the Upjohn Co. from polluting our air, soil and waters. The mayor of Middletown — Michael J. Cubeta Jr. — is holding meetings, public participating, with top officials of the Federal Environmental Protection Agency and the state Department of Environmental Protection, who are entertaining questions. The mayor took the initiative to inform his people of the dangerous experiment proposed and approved by the agencies mentioned (EPA and DEP) to burn in the electric generating company, Northeast Utilities Boiler No. 3 in Middletown, polychlorinated biphenyls. PCB is one of the most stable, non-biodegradable toxic and cancer-causing chemicals in extensive use today. I hope we in North Haven are not downwind if and when PCB is burned in the boiler in Middletown.

The residents of North Haven have an uphill battle on all levels of government — the local town front, the state level and the federal level — to clean up the pollution mess we find ourselves confronted with. Each level of government keeps leaning on the other two, hoping that they will take care of the problem. If we cannot get the local government to take the initiative, we cannot hope to get results. What should be our next step to correct the problem?

Kenneth R. Brody, research biochemist, North Haven

P6 / 4/83

106 Kings Highway
North Haven, Connecticut 06473
March 17, 1982

Mr. Robert DeSista
Department of the Army
New England Division
Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. DeSista:

Enclosed is a copy of the presentation which I made at the public regulatory hearing conducted by the U.S. Army Corps of Engineers on the environmental impact study of the proposed shopping mall in North Haven, which was held March 16, 1982 at the Orchard Hill Junior High School, Bassett Road, North Haven, Connecticut.

The enclosed presentation should be addressed and included as a part of the U.S. Army Corps of Engineers' final environmental impact statement.

Sincerely yours,

Kenneth R. Brody

Kenneth R. Brody

KRB:m
Enc.

March 16, 1982

Hearing Officers of the Army Corps of Engineers and Ladies and Gentlemen:

I was pleased to learn that the Army Corps of Engineers have not yet made up their minds as to whether to approve or disapprove the construction of the North Haven mall.

As we look at the problem in perspective, we can state that we can all survive and live with or without the mall. The issue is: "Will the benefits outweigh the bad features?" We must compare the advantages against the disadvantages, the benefits against the adverse effects.

The benefits are: Construction jobs, jobs in the stores, considerably more business here with an increase in the tax base, etc.

The bad features are: We will have a great deal more pollution due to the increase in the number of cars entering the area. There will be over 5,000 parking spaces and more than 50,000 cars per day entering and leaving these spaces. We are already above the maximum permissible pollution limits set by the federal government for car emissions on Washington Avenue and Bishop Street (Route 22). Even with the recent widening of Washington Avenue, the road can just about handle the heavy traffic at peak car use.

Our town tax base is about 50% residential and 50% business and manufacturing. This is a healthy ratio for tax purposes. The mall will not substantially change this ratio.

To take away 35 acres of wetlands, not for one year, two years or ten years, but for all time should never, never be allowed.

In conclusion, I stand firmly against the construction of the North Haven mall.

Thank you all.

Kenneth R. Brody
106 Kings Highway
North Haven, Connecticut

P7 485

Mall Speach for March 16, 1982 - Orchard Hill Jr. High by Army Corps.

I am here to speak this evening in strong support of the Army Corps of Engineers environmental impact statement. I speak as a 35 year resident of North Haven committed to a healthy economic future for my community. I also speak as a North Havener who is shocked and offended by the city of New Haven's interference in my town's affairs.

We all know the benefits of the North Haven Mall in terms of increased tax dollars, more jobs, and expanded shopping opportunities. These benefits will have a significant effect on maintaining the high quality of life in our town, for us, for our children, and for our grandchildren. The mall will produce a generation of continued low taxes, quality town services, and local economic prosperity. North Hanven cannot afford to lose this opportunity.

All of us also know of the decline of the city of New Haven. We all remember when New Haven was a community with quality stores and a thriving character. We all know that this city no longer exists. The fine stores are gone. The safe streets and easy parking are gone. The thriving neighborhoods have disappeared. Because New Haven cannot prosper, we in the suburbs and the small towns are being asked to forego prosperity ourselves. We are being asked to give up low taxes, more jobs, better shopping, and continued quality town services because New Haven cannot get these things on their own. I believe that this amounts to an unjust imposition of the consequencies of New Haven's bad judgement on people who had nothing to do with New Haven's mistakes and New Haven's failure to compete with its neighbors.

No one wants to punish New Haven. Everyone here hopes New Haven can work its way out of its economic problems. But I can't see North Haven, or Hamden, or East Haven, or any other neighboring town being forced to bear the burden of New Haven's bad decisions.

Economically, North Haven's a success story, while many local economies are in trouble, North Haven's booming building permits are soaring as new tax and job producing businesses are moving to town. I suggets that Mayor DiLieto and his large staff enroll in the North Haven school of economic accomplishment and stable management rather than harass our town because of its success. Only then I fear, will New Haven begin building its own economy to stand with that if its neighbors.

P.S. I do not/would not shop in New Haven but I do drive to the WestFarms Mall all the Time M.C

R[illegible]dent
[illegible]guerite Carboni
202 Quinnipiac Avenue
North Haven, Conn. 06473

PB 486

20 State Street
North Haven, CT 06473
March 20, 1982

Col. C.E. Edgar
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

Dear Col. Edgar:

Since we signed up but were unable to speak as time ran out at the March 16, 1982, public hearing the Corps conducted concerning the North Haven Mall, we offer this testimonly in writing.

We have read the Corps Draft Environmental Impact Statement and find it is incomplete, heavily reliant on input from the Mall developer and generally reflective of a study done from a distance rather than on site. We urge the Army Corps of Engineers to come on site and conduct its own study. An avoidance of such a study, coupled with remarks appearing in the New Haven Register on March 18th that the Corps and the government cannot afford to undertake expensive studies to satisfy every special interest group surrounding a project give us pause and, we feel, seriously hinder the Corp's credibility. People who are concerned with flooding, saving neighborhoods, preserving historic homes, and preserving inland wetlands should not be brushed off as merely special interest groups.

With specific reference to the DEIS, we call attention to Section IV A 10.1 Page IV -33:

> No historic archeological impacts are anticipated at the proposed mall site as a result of constructing a mall, or in any of the areas to be modified for traffic. The Proposed widening of Bishop Street . . .by the Connecticut Department of Transportation, which would be warranted even without mall construction, would assist in carrying mall-related traffic. Projected traffic increases generated by the mall should not cause significant increases in air-pollution and noise levels along the street.

We have the following comments and questions:

1. Is there any engineer who would say increased traffic would not increase air pollution and noise? Spend some time with us at our home on the corner of Bishop and State Streets and find out that you will have to keep the windows closed in the summer time and sleep with the noise of air conditioners to block out the sounds of all night traffic and motor cycles. What about truck deliveries to the

MAR 24 1982

mall? Won't they use State Street, Rte. 5? The Corps tends to view the historic district is segments, i.e., Bishop Street as disconnected from the entire Bridge Historic District. We view it as one entity with the whole being affected when any of its parts are altered drastically.

2. The DEIS states that Bishop Street is due for widening anyway. This is a simplistic statement which sets aside an even more complex argument. We are not arguing that Bishop Street does not need widening, nor are we saying it was not planned even before the mall was conceived.

   We think the Corps should recognize that the Mall-develper's figures show that nearly one third of mall traffic will travel Bishop Street between Rte. 15 and the Valley Service Road. The degree of mall-relatedness and decision on design of the rad widening is now in the courts. How, therefore, can the ACE claim that mitigation measures alone will absorb the incremental effects mall construction will have on historical structures?

   Five houses, two of historical significance, are now slated for demolition. Does this not affect the neighborhood? Is this not an historic impact?

We ask you to look also at Section 10.4 Cumulative Impacts, Page IV - 33:

Consider this passage in the light of above statements, and those which follow it.

> No cumulative impacts resulting from construction of the proposed mall are expected in relation to historical, architectural, cultural or archeological resources. The cumulative projected traffic increases on Bishop Street, with the incremental increases generated by the proposed mall, would not have a significant impact on the small portion of the potential North Haven Bridge Historical District that fronts on Bishop Street.

1. Our house is currently impacted by heavy traffic. A state study on historic North Haven homes cites traffic damage reflected in cracked 18th century window glass, sinking hearthstones andcollapsing chimney bricks. Will increased traffic <u>related to the mall</u> alleviate this situation?

2. The North Haven Historical Resources Inventory concluded that the portion of the Bridge District between Bishop-State-Broadway contained the highest concentration of 18th and 19th century houses in town. Other correspondence refers to this portion of the district as a cohesive neighborhood unit which merits Federal protection. The application for Federal historic registry is pending.

3. The DEIS has not addressed flodd impacts on historic houses at all. The DEIS map of flood prone properties acknowledges five of these homes as flood prone, but fails to mention them as historic in nature.

4. The need for a jughandle to service mall traffic connecting Rte. 22 to the Valley Service Road would involve the potential need to fill a flood plain directly opposite the most severly flooded historic properties (Steeves, Pierpont, DeMorro). According to residents, since 1970 construction of I-91 and the Rt. 22 connector and various downstream developments from Broadway north, have displaced flood waters and are responsible for the existing flood problem.

We urge you to come on site and perform your own study.

We further urge you to <u>deny the permit</u> to Mall Properties.

Sincerely yours,

Paul Cervoni

Paul Cervoni

Mary K. Cervoni

Mary K. Cervoni

Mr & Mrs. G. DeMarini
15 Sherwood Dr.
North Haven Ct. 06473

Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Rd.
Waltham Mass. 02254
Att. Robert Adler
NEDPL - 1P

Dear Sir,

I attemped to attend the hearing regarding the North Haven Mall, held at Orchard Hill Jr. High on March 16, 1982. Unfortunately due to the crowd, I could not even enter the auditorium.

I have reviewed the Draft Environmental Impact Statement and I must commend the U.S. Army Corps of Engineers for the excellent analysis of the proposed Mall.

Having lived in North Haven since 1968, I am thoroughly convinced that the Mall is needed in North Haven. To shop, we must travel to either the Meriden Mall or the Connecticut Shopping center in Milford. The Hamden Magic Mile has a limited number of shops and the stretched out layout of the stores does not make it convenient to shop. Shopping in New Haven is both inconvenient and dangerous because of the crime prevalent in the down town area.

The site selected for the Mall, is ideal for a shopping center. It's sandwiched in between Rt.15 and I 91. The traffic from these two major highways could easily flow to the sight without impacting the traffic in the rest of the town.

Opposition to the Mall, is from a group of malcontents and is irrational, unfounded and based on selfish reasoning. The group representing the residents of Rt.22 oppose the Mall because they feel that the expansion of Rt.22 is based on the construction of the Mall. This is thoroughly false. Rt. 22 is dangerously congested now, and should have been expanded when I 91 was constructed. The C.C.A.G. is another group that opposes anything and everything. Their assumption of increased water and air pollution are unfounded. How can a shopping center increase the pollution of the Quinnipiac River is completely incomprehensible Even If the entire site was paved over, the run off into the river would represent only a very small percentage of the flow of the river. The increase in air pollution from cars would be extreemly small. I91, Rt.15 are close to the site and the time to reach the parking area would be very short, therefore the increase in air pollution would be minimal.

The opposition from NewHaven is purely selfish. NewHaven finds itself having lost Malleys and many other fine stores. Bad management from past administration (and present) are to blame. Crime in the garage adjacent to the Malleys and Macys stores has driven many shoppers away from the downtown area.

In conclusion, I find that the North Haven Mall is economically justified, it meets the need of the community, it has no adverse effect on the environment and most of all is wanted by the people of North Haven.

I urge the U.S. Army Corps of Engineers to issue the Appropriate permit to proceed with the construction of the North Haven Mall.

Giuliano DeMarini Giuliano DeMarini

Donna DeMarini Donna DeMarini

Claudia DeMarini Claudia DeMarini

PIO 490

March 8, 1982

Army Corps of Engineers

Dear Sir:

This letter is to inform you of additional properties along the Quinnipiac River in North Haven that have flooding Problems in severe rain storms.

The Properties at 2A and 2R Banton Street North Haven are involved. The rear of the Property at 2R Banton Street is right on the Bank of the Quinnipiac River. When heavy rains occur & the River rises, the water comes over the Banks & floods the rear of the Property. also a stream that runs along side of the house at 2A and 2R Banton St also rises because the water empties into the Quinnipiac River. as the Quinnipiac river gets higher the water in the stream has no where to go, so the water in that rises and at times floods part of the Property.

I feel that when the Quinnipiac River floods in bad storms a representative of the Army Corp of engineers should come and look over the flooding situation.

Also, the Quinnipiac River in North Haven needs to be dredged.

Sincerely
Paula Dichello
2A Barton St
North Haven Conn 06473

I am TR Dunham of 40 Millbrook Rd Chairman Econ Devel Commission

Thank you for continuing this hearing so that everyone can have the opportunity to speak. I wish to address a question of bias in reporting sales figures. Last night's session of this hearing proved particularly rewarding I think -- not because there was any great new light cast up on the matter before you but, rather, because of the ~~remarkable~~ display put on by the employees and so-called "independent" consultants of the City of New Haven. I ~~repeat~~ feel that these consultants were paid by the City of New Haven to do the City's bidding -- Nothing more, nothing less.

Let's compare their work to that of the mall developer, its technical people, and the Corps -- work that resulted in Draft E.I.S.:

As I understand it, the Draft is the product of two and one-half years of research and analysis by the consultants, with additional research, review and analysis by the Corps. Incredibly, it ~~has taken~~ took the hired spokesmen of the City of New Haven less than two months to reach their conclusions ~~within the last two months.~~

~~Okay, so they're geniuses.~~ But what did ~~that genius~~ this effort produce? ~~Let's~~ Use consultant Mel Levine as an example.

~~Remembering that~~ He is a former employee of the American Cities Corporations (which is owned by the Rouse Company, New Haven's favored developer)... Remembering this, Levine ~~preposterously~~ quickly

concludes ~~in two plus weeks~~ that, instead of a projected 6% cut in retail sales, New Haven would experience a 30% decline in business. Just as outrageous as that conclusion is his further ~~conclusion~~ statement that this projected decline in sales would also result in one-third of New Haven's stores shutting down. Yet no evidence what-so-ever was offered to support this so-called independent judgment.

One speaker after another ~~speaker~~ last night charged that the Draft E.I.S. was filled with bias, that the work performed was not credible. Well, ~~this speaker~~ I would like to state ~~your~~ plainly that if there is bias and lack of credibility—it was exhibited only by the paid ~~[illegible]~~ consultants of the City of New Haven, ~~who~~. While they performed their services like good soldiers, they did it hastily, ~~[illegible]~~ and with what can only be construed as total bias. Thank You.

P 12 2/94

4 Bishop Street
North Haven, Conn. 06473
March 18,1982

U.S.Army Corps of Engineers
424 Trapelo Road
Waltham, Mass.02254

Attn: Mr Robert E. Adler

Dear Mr Adler:

I feel that you should include Bishop Street in your EIS study. This residential and historical street is in the microanalysis area not the macroanalysis as you say (Ref. Sec.111-8). On May 14,1981 this area was determined to be eligible for the National Register of Historic Places. (Ref. Sec.4(f) DOT report enclosed)

In section (Ref. Area of Controversy) last paragraph you say area residents feel the widening is only necessary to carry Mall generated traffic, but this should read the area residents feel the widening (OVER 3 LANES) is necessary to carry Mall related traffic. You will see by the enclosed copies why we know the widening is Mall related. The DOT's own memos conclude 3 lanes are preferable to 4 because of cost (public money) and mostly because there is no difference in traffic flow between 3 and 4 lanes. (Ref. report of meeting 11/13/78 enclosed).

You say DOT has proposed widening to upgrade its condition and existing demands (Ref. Sec. 3) Why not include what conditions and demands they refer to. If safety and accidents are the conditions there were 26 accidents in a three year period on this two lane Sec. Rt. 22 Bishop Street (REF. Page 79 DOT Env. Assessment) but the four lane section of Rt.22 called the connector had 21 accidents in an 11 month period(From our first public hearing 3/10/80 to our second 2/5/81) another 9 month period there were 18 on the same stretch so can one say 4 lanes is needed for safety?(Ref. figures given to me by our Chief of Police Mr Berniere) Now if existing demands are for 4 lanes what will further demands be when 40% of Mall generated traffic will pass through this 900 feet of roadway with 10 private driveways and a dead end street with 42 homes on it and an entrance and exit to a major highway (Wilber Cross). It amounts to 16,800 trips week days and 22,400 on a saturday (Ref. table 14 in appendix H) (A VERY LOW ESTIMATE FOR THE BUSINESS THEY PREDICT).

As to level of Service why isn't there a table same as Table 15 App. H but in the Microanalysis area. Didn't they want you to consider this?

How did your engineers evalute the impact of flooding when the Jug Handle is constructed as the maps had no scale and the section to be filled is about a 40 ft. drop and starts at the east edge of the river (Ref.Maps Sec. App.H).

You are going to allow fill in 28 acres of wetlands and cover 117.5 acres with asphalt and concrete, but to allow this is to allow more filling and concrete areas as with the Mall comes the development of Valley Service Road which can't be used unless filled. This is an area even during periods of heavy rains and

especially every spring is flooded up to the present Valley Service Road and covers construction sites. Where will the water go when it can't go east of the River, it will go to the west (Residential Area).

If there is Federal funds available to widen a stretch of road for Mall Traffic (Private Development) there must be some to use to make it possible to research impartially.

Very truly yours,

Alma H. Engels

Alma H. Engels

STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
24 WOLCOTT HILL ROAD, P.O. DRAWER A
WETHERSFIELD, CONNECTICUT 06109

May 17, 1979

An Equal Opportunity Employer

Mrs. Alma H. Engels
4 Bishop Street
North Haven, Connecticut 06473

Dear Mrs. Engels:

Subject: North Haven - Route #22
Project #100-130

Thank you for your letter of May 7, 1979, your comments on the above noted project and the clipping from the Advisor.

Whereas the design has now progressed to a stage where the takings can be determined, it has still not been resolved between the State and the Town as to the number of lanes that are to be built. If we have three only sliver takings will be needed, four involves some houses and five will affect all the houses on the north side of Bishop Street. The number of lanes will depend mostly on whether the North Haven Mall becomes a reality or not.

It is presently anticipated that a public hearing on this project will be held this fall. I urge you to attend and present your questions to the State and Town officials. It will not be until after the public hearing that a decision will be made on the width of the road and its affect on your property.

I cannot tell you when the State will be purchasing property but the present schedule would indicate that it is about two years away.

Very truly yours,

Donald G. Leavitt
Director
Office of Rights of Way

STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
24 WOLCOTT HILL ROAD, P.O. DRAWER A
WETHERSFIELD, CONNECTICUT 06109

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Office of the Commissioner

July 17, 1979

An Equal Opportunity Employer

Ms. Alma H. Engels
4 Bishop Street
North Haven, Connecticut 06473

Dear Ms. Engels:

Subject: North Haven Urban Systems
Reconstruction of Bishop Street (Rte. 22)
Project No. 100-130

Your letter to Governor Grasso concerning the Bishop Street reconstruction has been directed to me for response.

The Town of North Haven requested in 1975 that improvements be made to Bishop Street between the Hartford Turnpike and State Street, and the Hartford Turnpike from Bishop Street to the Wilbur Cross Parkway Ramps. The Town's request was based upon existing traffic volumes and the inability of Bishop Street to safely and efficiently carry those volumes.

The reconstruction and widening of this portion of Bishop Street are required to provide additional highway capacity to handle the current traffic demand, let alone future volumes. The Department's engineers would be remiss if they were to overlook the possibility of a shopping mall in the area of the proposed highway improvement. The possibility of a shopping mall in the area is only one of the many factors that will be considered in developing plans for the Bishop Street improvement.

A public hearing will be held after one of the several alternate schemes currently being studied is selected as the most appropriate. I recommend that you attend the hearing to make your feelings known for the record.

Thank you for taking the time to express your concerns regarding the Bishop Street project. I assure you that your concerns will be taken into consideration in the overall decision making process for this project.

Very truly yours,

Frank M. D'Addabbo, P.E.
Deputy Commissioner
Bureau of Highways

cc: Hon. Ella Grasso
Mr. Salvatore C. Fazzino, P.E.,L.S. - Town Engineer

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CHIEF OF DESIGN
DATE 12/7/78
REFERRED TO
HIGHWAY DESIGN NG
BRIDGE DESIGN
DESIGN FILE
OTHER

CONNECTICUT DEPARTMENT OF TRANSPORTATION
BUREAU OF HIGHWAYS

Design Section

Unit No. 1301 (Group 5)

REPORT OF MEETING

PROJECT NO. 100-130

DATE OF MEETING November 13, 1978

ROUTE NO. Conn. 22 & SR 725 Reconstruction

TOWN(S) North Haven

LOCATION OF MEETING: Selectman's Office - Town Hall, North Haven

SUBJECT OF MEETING: Review of Project Plans

N ATTENDANCE:

n of North Haven:	Mr. Walter J. Gawrych	First Selectman
"	Salvatore C. Fazzino	Town Engineer
"	V. E. Palmeri	Director Finance
onal Planning Agency:	Herbert Burstein	Transportation Planner
DOT:	Harold Siebert	Planning
"	John Stock	Design
"	Robert Meskill	Design
"	Stanley Macher	Design
"	Frank J. Ferlazo	Rights of Way

LANSACTIONS AND DETERMINATIONS:

Connecticut DOT Design representatives presented plans showing a three lane concept Bishop Street (Rte. 22) between Hartford Turnpike and State Street. This plan was a inement of the four lane concept originally discussed with the Town in 1976. It was noted that the traffic carrying capability of the 3 lane concept was about al to that of the 4 lane concept on this section of Bishop Street. This is because both cepts provide for a single lane approach to Route 22 from any direction on the intersecting ls and ramps. The 3 lane concept produces minimum neighborhood impact and is within the ling limits set up for the project. Two relatively minor partial property acquisitions

over

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August 10, 1979

Mr. Reed Mitchill
Corresponding Secretary
The Committee for the Preservation of Bishop Street
26 State Street
North Haven, Connecticut 06473

Dear Mr. Mitchill:

Subject: North Haven Urban Systems
Reconstruction of Bishop Street (Route 22)
Project Number 100-130

Thank you for your letter of July 23, 1979 concerning this project.

We disagree that we failed to address the impact of Mall Traffic on the widening of Bishop Street in our letter to the president of the Committee, Mrs. Alma Engels. We informed Mrs. Engels that several options were currently being studied and the Mall is one of many factors being considered in the development of the options. Accordingly, we recommended that the Committee attend the public hearing to review the information in its completed stage rather than speculate on incomplete information.

It is our intent to discuss four on-site options at the public hearing - three, four and five lanes, and no-build. We will also be prepared to discuss the alternate routing you have suggested. Our studies will include analyses of air quality, noise, social ramifications, traffic service, and ecological impacts.

We would also like to correct some misunderstandings you may have about the semi-social aspects of the undertaking. We are aware that two homes of historic "character" may be impacted by some of our options. These buildings are not listed on the National Register but may be eligible for registration. We and the Federal Highway Administration are pursuing a decision on this matter. We are also very much aware of several elderly homeowners that may be involved with some of the options. Mrs. Engels informed us of the potential problems and a Mrs. Brockett is also known to be concerned. This is completely understandable.

In summary, we are asking you and the Committee to delay reaction until we have had an opportunity to fully address the situation. You may be sure that no final decisions have been made or will be made until the public has the opportunity to thoroughly review our information and comment at a formal hearing.

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e required.

Town representatives noted that the proposed construction of a shopping mall to the ortheast of this project, (possible construction starting in 1980) will have a major effect on traffic requirements in this area. Although the 3 lane concept will provide immediate traffic relief it definitely will not handle anticipated future traffic volumes when the shopping mall is constructed.

State representatives then presented a study depicting a five lane concept for Bishop Street that would better provide for the anticipated future traffic volumes but with the following effects:

1. Major impact on the neighborhood involving total take of all homes on the north side of Bishop Street along with possible other extensive property acquisitions along the Hartford Turnpike.
2. Major reconstruction of the bridge carrying Route 22 over the Wilbur Cross Parkway.
3. Possible relocation of the northbound Wilbur Cross on-ramp.
4. Cost will be at least three times the presently allotted project funds.
5. Project time schedule will be extended due to Major Action Requirements, Environmental Statement, 4(f) Statement (Historic Houses) and Air Quality Studies.

The meeting concluded with the following understanding:

The Town will study the 3 and 5 lane concepts individually and with the consultant ngineers who are developing the shopping mall. In approximately two weeks they will contact he Department of Transportation to arrange another meeting for further discussion of the adway concept.

Submitted by: Stanley Mucher

Date: 11-20-78

proved by: J. A. Stich

Date: 11/20/78

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I have also directed our Division of Design to inform the Committee when the information is available and to meet with representatives to explain the options at that time. We expect this will be in the fall of this year.

Should you have additional questions you would like answered, you may contact Mr. William Ginter, our Engineer of Design responsible for this project. He may be reached at the letterhead address or by calling telephone number 566-2365.

Thank you again for expressing the concerns of the Committee. Hopefully, we will be able to arrive at a solution to this most difficult problem working together and with the Town.

Very truly yours,

Frank M. D'Addabbo, P.E.
Deputy Commissioner
Bureau of Highways

cc: Hon. Ella Grasso
Mr. Salvatore Fazzino, Town Engineer, North Haven
Mr. D. J. Altobelli, Federal Highway Administration

Also Jug Handle 501

TOWN OF NORTH HAVEN

FIRST SELECTMAN
LESTER W. GOTT

SELECTMEN
HOWARD L. LUPPI
WALTER R. MAHON

MEMORIAL TOWN HALL / 18 CHURCH STREET, NORTH HAVEN, CONN 06473 /

Needs A-95

April 18, 1975

Mr. Norris Andrews, Director
Regional Planning Agency of South Central Connecticut
96 Grove Street
New Haven, Connecticut 06510

Dear Mr. Andrews:

The Town of North Haven would like to request a change in priorities in the tentative three-year work program previously set up for the Federal Aid Urban (FAU) System highway program in the Town.

For reasons outlined below we would like to change our priority on Town roads included in the previously submitted work program, and instead place the following project lying entirely on the present State highway system as our first priority.

The projects we would like to see deferred for the time being are:

Mt. Carmel Avenue - Planning and prelimi[illegible] study, and Montowese Avenue - Section 1 - Cloudland Ro[illegible] to Quinnipiac Avenue.

Instead, we would like to substitute the following program relating to Route 22, divided into three segments, as indic[illegible]

(a) Route 22 (Bishop Street) - Hartford Turnpike to [illegible] and portion ~~of Hartford~~ Turnpike to Wilbur Cross [illegible]

(b) Route 22 and U. S. Route 5 (Relo[illegible]d) - State St[illegible] Washington Avenue, and (jughandle)

(c) Valley Service Road - St[illegible]lman Ro[illegible] No. 1) - [illegible]om Route 22 to I-91 on-ramp. (widening)

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April 18, 1975

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Norris Andrews, Director

This request for a change in priorities is in part based on a series of traffic studies that have been prepared in support of the proposed North Haven Mall project which will be located on Valley Service Road about one mile north of Route 22. North Haven Mall will be a regional shopping center with 1,000,000 square feet of gross floor space, including at least three department stores and over 5,000 parking spaces. This very large traffic generator will have a major new access facility to and from U. S. Route 5 (Washington Avenue) through a new four-lane divided underpass to be built by the Town beneath the Springfield Line of the Penn Central Railroad. Some time in the future, the shopping center can be expected to have access to and from the Wharton Brook Connector near the Wallingford-North Haven line by a northward extension of Valley Service Road. However, for the time being the only other access to the site is via Valley Service Road to and from Route 22. The Town and the developer have entered into an agreement whereby this road will be improved into a four-lane facility, some portions with a median divider and left turn storage lanes.

However, portions of Route 22 and the short State-owned segment of Valley Service Road (from Route 22 north to the I-91 on-ramp) will not be adequate to handle the expanded traffic loads. One segment of Bishop Street is quite inadequate even for the present traffic loads. The proposed improvements to Route 22 and the Valley Service Road will be discussed under three separate headings below.

to p.3

Bishop Street - Hartford Turnpike to State Street and portion of Hartford Turnpike to Wilbur Cross Parkway Ramp.

This 1,200 foot segment of Route 22 is a two-lane road, quite inadequate to carry its present traffic loads. Traffic is further complicated by the relative close proximity of the four-way stop intersection at Hartford Turnpike with its heavy traffic movements, the busy T-intersection at the northbound Wilbur Cross Parkway ramps (without traffic controls except a stop sign on the off-ramp), the four-way intersection at State Street (traffic controlled), as well as a minor intersection and several private driveways.

SECTION 4(f) REPORT - HISTORIC DISTRICT
WIDENING OF BISHOP STREET AND THE HARTFORD TURNPIKE
NORTH HAVEN, CONNECTICUT

A. Description and Need of Project

The proposed project involves the widening and reconstruction of a section of Hartford Turnpike (S.R. 725) and Bishop Street (Ct. Rte. 22) in the town of North Haven. As shown in Figure 1, the project begins on Hartford Turnpike at the southbound ramps for the Wilbur Cross Parkway and extends southerly to Bishop Street, where it then proceeds easterly on Bishop Street to terminate at Upper State Street. The total length of the project is 2300 feet.

This proposal would provide four 11 foot travel lanes with two 4 foot shoulder/bicycle lanes along Bishop Street and Hartford Turnpike, as well as traffic signals at the intersections of Route 22/Upper State Street, Route 22/northbound Wilbur Cross Parkway ramps, Route 22/Hartford Turnpike and the Hartford Turnpike/southbound Wilbur Cross Parkway ramps. Bishop Street at the Hartford Turnpike intersection would have an additional lane in the westbound direction to provide a free flow right turn movement. This plan would also extend the sidewalk on the south side of Bishop Street across the bridge to Hartford Turnpike. The bridge on Bishop Street passing over the Wilbur Cross Parkway would require widening on the north side to accommodate the additional lanes.

These improvements are proposed to increase the capacity of Bishop Street and the Hartford Turnpike to accommodate existing and future vehicular traffic flows and turning movements for the purpose of decreasing congestion and increasing traffic circulation.

B. 4(f) Involvement

The proposed project will require involvement with a historic district which was determined to be eligible for inclusion in the National Register of Historic Places on May 14, 1981. This district is comprised of thirty-four homes, sixteen of which have been designated as being historically significant because

CHIEF OF DESIGN
DATE 12/4/78
WG 504

CONNECTICUT DEPARTMENT OF TRANSPORTATION
BUREAU OF HIGHWAYS

Section
t No. 1301 (Group 5)

REPORT OF MEETING

JECT NO. 100-130 DATE OF MEETING November 22, 1978

TE NO. 22 & SR 725

N(S) North Haven

ATION OF MEETING: Room 413, 160 Pascone Place, Newington

JECT OF MEETING: Lane Concept on Route 22

ATTENDANCE:

Mr. Salvatore Fazzino - North Haven Town Engineer

Mr. Benjamin G. Barkam - Traffic Consultant, Town of North Haven

Mr. Herbert Burstein - Regional Planning Agency

D.O.T. - Mr. George H. Hubbard
William Ginter
John Stock
Stanley Macher
Joseph Peltier
James Rice
Walter Coughlin
Frank Ferlazo
William Lodder

He shot as you well know now - and he wasn't in 1978 the Town had no Traffic Consult

NSACTIONS AND DETERMINATIONS:

Discussion centered on the various merits of 3-lane, 4-lane and a 4-lane with turning lanes at intersection (5-lane) concepts for Route 22.

The following determinations were made:

1. Initially the Town representatives felt that 4-lanes on Bishop Street would be incorporated in the proposal, realizing that this would cause problems at the intersections when the anticipated traffic volumes were taken into account.
2. The 3-lane concept would only handle immediate traffic needs but would require very little property acquisition and would have the least impact on the area.

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the 4-lane concept throughout the entire project would lead to backups at the major intersections. It would require several partial takes that could lead to total takes if opposition was encountered.

4. The 4-lane with turning lanes at intersections (5-lane) concept would handle present and future traffic flow.

   This concept would have a basic section of:

   4-11' lanes
   2-4' shoulders (can be used as bikeway)
   Sidewalk across the bridge on Route 22

5. The 4-lane with turning lanes at intersections (5-lane) concept would be the most expensive to construct and involve property acquisition difficulties similar to the four lane concept.

6. Mr. Fazzino noted the residential character of Bishop Street has been lost. He believes that property owners who are made non-conforming through a partial take would prefer total takes.

Upon conclusion of the above noted determinations the following was agreed to:

1. Design will further discuss the options with other concerned groups within the D.O.T. in order to determine which alternate will be recommended by the Department.
2. The Town will determine if the expanded concept can be included in amended form on the TIPS program.
3. When the option determination has been made D.O.T. will inform Mr. Fazzino of its recommendation.

SUBMITTED BY: Stanley Macher ENDORSED BY: J A Stock

DATE: Nov. 30, 1978 DATE:

APPROVED BY:

DATE:

Stanley Macher/John Stock:jm

cc: Edwin J. Fijol - George H. Hubbard - William Ginter
Frank M. D'Addabbo - James Rice
Donald G. Leavitt - Angelo Aresco
Earle R. Munroe - Joseph Peltier
Frederick Chatfield - Raymond Mihon
Central Files

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CONNECTICUT DEPARTMENT OF TRANSPORTATION

BUREAU OF HIGHWAYS

REPORT OF MEETING

CHIEF OF DESIGN
DATE 11/9/78
REFERRED TO
HIGHWAY DESIGN W/G
BRIDGE DESIGN
DESIGN FILES
OTHER

FROM DESK OF E. J. FIJOL
G. HUBBARD
F. CHATFIELD
A. T. ORA
E. R. MUNROE
DIV. FILES

n Section

it No. 1301 (Group 5)

OJECT NO. 100-130

JTE NO. 22 & SR 725

DATE OF MEETING November 1, 1978

WN(S) North Haven

CATION OF MEETING: 160 Pascone Place, Room 413

BJECT OF MEETING: Preliminary Design Review

ATTENDANCE:

Edwin J. Fijol - Manager of Design
George H. Hubbard - Chief of Design
William Ginter - Highway Design
John Stock - Highway Design
Stanley Macher - Highway Design
Gerald Tarka - Highway Design
William Lodder - Design, Geometrics
Joseph Peltier - Municipal Systems
Henry Kapinos - Bridge Design

NSACTIONS AND DETERMINATIONS:

The meeting opened with a review of the 4-lane design presented at the Pre-P.D. Review and the subsequent decision to study two alternate plans.

The alternate plans presented were 1) (3 lanes) imposing minimal impact on the area and 2) (5 lanes) imposing significant impact on the affected area.

It was noted that construction of a large shopping center to the east of this project s now imminent. This will be a major traffic generator that will affect traffic volumes on he proposed project. It was agreed that Plan 2 (5 lanes) will better accommodate these volumes total takes of five homes will be required as well as several easements and rights. In ontrast, Plan 1 (3 lanes) cannot handle the desire volumes * but requires only

There was considerable scepticism that the desire volumes could ever be attained in view of constraints beyond the project limits and considerable agreement that this concept could handle , if not all, of the probable actual traffic volumes

one partial take and various rights and easements.

The original four lane design would basically accommodate the same volumes as Plan 1 (3 lanes) but the construction costs would be $70,000.00 more and right of way would require one total take and five partials as well as some easements and rights.

Both Plans 1 and 2 would provide for bikeways within the project limits.

Construction costs of the various plans are as follows:

Original Pre P.D. Plan (4 lanes)	-	$430,000.00
Plan 1 (3 lanes)	-	$360,000.00
Plan 2 (5 lanes)	-	$770,000.00

The latest modified project initiation dated June 6, 1978 lists the construction cost at $358,000.00. It was agreed that Design will proceed with Plan 1 (3 lanes) for the following reasons:

1. A lesser overall impact results from this plan in contrast to the others. This in turn is expected to produce less negative reaction to the project from abutting and surrounding land owners.
2. Cost of this plan compares most favorably to that of the project initiation.
3. The three lane concept provides for passage of approximately the same number of vehicles as the four lane concept. This is because the governing factor is the signalized intersections which limit the number of vehicles entering the area of concern.

Concluded

Therefore Plan 1 will be presented to the Town for their consideration and if in agreement will be the basic plan taken to a Public Hearing.

The Division of Traffic was not present at the meeting.

Subsequent to the meeting Mr. Walter Coughlin of the Division of Traffic was informed of the decisions made at the P.D. Review. He stated his agreement with them.

SUBMITTED BY: J A [illegible] 508

DATE: 11/2/78

Endorsed

~~REVIEWED~~ BY: [illegible]

DATE: 11-07-78

APPROVED BY: [illegible]

DATE: 11-8-78

Gerald Tarka:jm

cc: Edwin J. Fijol - George H. Hubbard - William Ginter
Frank M. D'Addabbo - James Rice - Walter Coughlin
Frederick Chatfield - Raymond Mihon
Milton Johnson - Henry Kapinos
Earle Munroe - Joseph Peltier
Donald G. Leavitt - Angelo Aresco
James McCaw
Joseph Patterson
Central Files

P 13

509

Rico Bennett Gattilia
3 School Lane
North Haven, Connecticut 06473

Dear Mr Adler;

March 26, 1982

When I spoke to you on March 17th at the "North Haven Mall" hearing I was amazed to hear the information you had for your decision making on the coastal tide in the Quinnipiac River, This information I feel is in-accurate.

Several years ago, I was contracted to reconstruct a large sea wall a short distance from the Mall Site. I had to work-around a five foot coastal tide. I could only work at low tide.

There is a 4-5 foot coastal tide at the Mall Site every fourteen (14) hours, incoming tide six (6) hours, out-going tide six (6) hours, we have up to two (2) or more hours at high tide before it changes because of the distance from the New Haven harbor. This is the normal course of the river at normal times, when we have heavy rains along at high tide mark the Mall Site is always flooded, when we have coastal storms, spring thaws, all these conditions are compounded.

I think the coastal tide in the Mall Site area will have an affect on your decision. I am therefore asking you to please investigate this serious situation.

The present data you have is in-accurate. I have color slides of the Quinnipiac River taken in the Spring of 1981 at low tide and high tide, following some heavy rains showing the flooding conditions which I had mentioned to you when I spoke with you in North Haven.

Rico Bennett Gattilia
3 School Lane
North Haven, Connecticut 06473

I have lived in North Haven all my life, a very short distance from the Quinnipiac River, and am quite familiar with this problem.

Please contact me, if you are interested in seeing these slides, which I feel are quite important.

Sincerely,

Rico B. Gattilia

(203) - 248-7205

P 14

511

207 Everit Street
New Haven, CT 06511
March 23, 1982

Mr. Robert Adler (NEDPL-IP)
Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

Dear Mr. Adler:

As a resident of New Haven and former resident of Wallingford I am greatly concerned about the potential impacts of the North Haven Mall on the region, both urban and rural. After reading the draft EIS I became even more concerned. I am familiar with energy use patterns having worked as an energy consultant for Yale University, and was shocked by the misinformation and misleading statements I found in the energy section of the draft EIS.

Section IV subsection 11.0 of the draft EIS for the North Haven mall, North Haven, Connecticut deals with energy consumption of the proposed mall complex within the context of the 'area' (which is not defined). As there are no specifics contained within the discussion and much is paraphrased from the report submitted by Parsons Brinkerhoff Quade and Douglas, Inc., Appendix P, I will assume the consultants report is the basis of the energy section of the draft EIS. The proposed mall will be using electricity for most of its energy needs and accordingly electricity will be the focus of my comments:

1) ELECTRICAL DEMAND OF THE PROPOSED MALL WILL BE SIGNIFICANT

The total quantity of electricity projected as the annual consumption (assuming air conditioning has been included, which is unclear from Table 19) for the mall is roughly 30,000 mwh/yr or the consumption of 4,800 area homes per year. The average United Illuminating (UI) residential customer uses 6.3 mwh/yr (1981)(Report to the Connecticut Siting Council, March 1, 1982 by United Illuminating Company, New Haven, CT. All further references to use electrical patterns comes from this report). The electrical usage of the proposed mall as presented in Table 19 represents the consumption of 13,000 people, certainly this is not within the definition of insignificant or close to the 100 homes refered to in the draft EIS.

2) PROJECTED ELECTRICAL DEMAND OF THE PROPOSED MALL IS TOO LOW

The usuage figures in Tables 18 and 19 are not reasonable. The average load figures (annual consumption divided by peak demand times the number of hours in a year times 100) are 24% for the mall stores, 73% for Macy's, 49% for Sears, 44% for G. Fox, and 29% for J.C. Penny. Some of the load figures are much too high to be reasonable. Given the large cooling demand

that will be experienced on hot summer days when the mall is busy it is impossible to believe that Macy's will be consuming electicity at 73 % of its average demand, even if electric heat is installed. The system average for UI is around 50% but for commercial spaces such as the proposed mall it would be expected to be lower. The load figures projected for the mall stores is one third that of Macy's even though they both have the same pattern of energy needs. There seems little doubt that the peak demand figures are to low as presented in Table 18. This affects peak load margin calculations. Annual consumption figures presented in Table 19 are also suspect since the total square foot usuage rates for electricity vary by a factor of three. Heating calculations vary by a factor of two while cooling varies by a factor of five. The data is rife with inconsistancies and without a detailed listing of assumptions and design considerations it is not possible to deal with the data in a meaningful way. The dramatically lower energy use per square foot in the anchor stores was not explained in the draft EIS or in Appendix P. Reasonable assumptions lead one to increase the project's annual electrical consumption and the peak load, any specific revisions need to be based on more complete data than that which has been presented.

3) PEAK ELECTRICAL DEMAND OF THE PROPOSED MALL WILL BE A SIGNIFICANT PERCENT OF UI'S CURRENT PEAK LOAD MARGIN

Peak electrical load for the proposed mall has been projected at 11.5 mw and UI has a peak generating capacity of 1,299 mw. The peak generating figure does not include transmission losses, generator down time or existing peak demand. The peak load margin is the figure that should be of interest. UI has low transmission losses at 6% and high generator availability with 85% of generating capacity being on line on average. With these considerations taken into account UI has an average load capacity of 1104 mw of which 999 was needed last year (weather corrected peak load demand). This leaves UI with a peak load margin of 105 mw (assuming the Table 18 peak load demand for the proposed mall is correct, which is doubtful) and the proposed mall will account for atleast 9% of this margin.

It is important to remember that UI serves a larger population than will the proposed mall. All energy considerations have to be put in to the perspective of the region to be served by the mall and not the area served by UI. This is a very important consideration if the social costs of energy use at the mall are to be understood. If three malls were built so that all of UI's customers had access to a regional mall and the peak electrical demand were more realistically calculated, see section 2, the malls' peak demand would be approximately 50% of UI's peak load margin.

It is reasonable to expect that UI will have to build new generating capacity if electrical demand grows. The current capital cost of builing generating capacity to cover the peak electrical demand of the proposed mall is atleast $20,000,000. Given the current economic climate and lack of local capital such an expenditure by UI would have negative regional impacts, the capital would produce far fewer jobs than if it had been spent in industrial or commercial development.

4) ELECTRICAL USE PER EMPLOYEE WILL BE MUCH HIGHER FOR THE PROPOSED MALL THAN FOR OTHER LOCAL RETAIL SPACE

The average amount of electricity to be used in the proposed mall per person employed is over three times greater than in the average trade business serviced by UI (assuming the proposed mall will employ 1200 people full time and that the average trade customer of UI uses 7.0 mwh/yr/employee). The importance of this calculation is that on a regional basis the proposed North Haven Mall complex will consume a lot more electrical energy relative to alternative patterns of retail space allocation. Jobs created by the proposed mall, the net regional benefit, will result in a lot of wasted energy with its corresponding social costs. Centralized retail space within a large structure is not energy effecient or prudent, as it forces the region into high fixed energy costs. A larger number of small independent retail spaces would be more flexible and provides far greater return on energy investment.

5) THE PROPOSED MALL WILL NOT BE CONSISTANT WITH A REGIONAL NEED TO CONSERVE ENERGY

It is certainly critical that we decrease or atleast hold constant energy consumption regionally, and the proposed North Haven Mall appears to be a major step in the opposite direction. The electrical consumption of the proposed mall represents that which would be used by a town of 7,000 people, including industrial, retail and residential demands. Will the region benefit suffeciently to justify such major energy consumption? It is hard to see how the answer could be yes given that similar retail space in more traditional structures would use one third as much electricity and require a capital investment of $15,000,000 less on the part of United Illuminating, while providing the same regional economic benefits.

Electrical usuage has to be kept from growing for several major social reasons. Current economics make importation of foreign oil (UI uses imported oil to generate upwards of 80% of its electricity) very costly both directly and indirectly, with respect to national economic health. Use of fossil fuels contributes greatly to air pollution which has been implicated in major environmental degredation and health problems and is particularly accute in the New Haven area. Construction of new electrical generating capacity will limit the capital availability to more labor intensive projects which return more to the region's economy than does construction of new power plants. Lower electrical usuage also keeps the average cost per unit lower for all customers, as new energy sources cost more per unit of power delivered than do current online facilities.

SUMMARY

In summary the North Haven Mall complex as proposed and reviewed in the draft EIS will have major energy impacts regionally which have not been considered in the draft report. Additional review is necessary to assess the regional costs of energy use at the proposed mall inorder to make an intelligent decision on the reasonableness of incurring these additional costs.

Sincerely,

Steven P. Hamburg

Steven P. Hamburg

MAR 17, 1982

P 15

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STATEMENT OF G. E. HARTSOE

My name is Glenn Hartsoe and I live at 11 Sherwood Drive, North Haven. I have been a resident of North Haven for 13 years.

I am a registered Professional Engineer and do not wish to cast any doubt whatsoever on the ethical integrity of the Engineering profession. However, in dealing with many consultants, both engineering and others, I have found that their findings invariably reflect the desires of their clients. This is done by presenting facts and figures in the most favorable light and by disregarding or ignoring pertinent information.

A few weeks ago I received a package from the Corps of Engineers. In this package were the Draft Environmental Impact Statement and 8 booklets. These booklets contained 19 studies, 17 of which were done by consultants employed by Mall Properties. It was obvious the Corps of Engineers had relied almost entirely on information biased toward Mall Properties.

While there may be numerous errors and omissions in these reports, I have two major concerns that should be independently addressed by the Corps of Engineers as follows:

1. The need for the Mall is based on obsolete information. For Example Census figures from 1970 were used. Since then many factors have changed. ~~One~~ Two elementary schools in North Haven has been closed and another closing is imminent. Population trends have changed dramatically. The Edward Malley Co. store in New Haven has gone out of business. We are undergoing a major recession with serious changes in spendable income. These factors must be re-evaluated independently.

2, Air pollution in this area is a serious problem and may become of critical proportions if the Mall is constructed, particularly for the elderly or the sick. It is no coincidence that Connecticut has one of the worst air

pollution problems in the ccuntry and one of the highest death rates from cancer. The Corps of Engineers must give air pollution problems much more consideration than their report indicates.

Finally, I want to question the validity of this hearing. Last night hundreds of people could not get into this hearing room. The cafeteria was packed to overflowing and the outside hall was full. Hundreds of people left because they were denied admittance and could not observe or participate in these hearings. The Corps was advised of the intense interest in these hearings and that the room might not be adequate. You were obviously advised by Town officials to disregard these possibilities and elected not to use much larger available facilities.

Thank you.

P 16 317

38 BLAKESLEE AVENUE
NORTH HAVEN, CONN. 06473
MARCH 16, 1982

DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02254

DEAR SIRS:

I AM INDEED SORRY AND A LITTLE SURPRISED THAT WE ARE AGAIN GATHERED HERE TONIGHT TO HAGGLE OVER A CONTROVERSIAL SUBJECT THAT COMMON SENSE SHOULD HAVE LAID TO REST SOME TIME AGO. THE QUESTION OF WHETHER OR NOT TO HAVE THIS HUGE SHOPPING MALL ON THE QUINNIPIAC RIVER FLOOD PLAIN IS NO LONGER ONE OF JUST FILLING IN A LITTLE MORE WETLAND. IT INVOLVES A PHILOSOPHY THAT WILL BURN OUR COUNTRY OUT WHILE STILL IN THE INFANCY OF WORLD LEADERSHIP; ONE HUNDRED YEARS IS A SHORT TIME IN THE HISTORY OF MAN AND FAR SHORTER YET IN THE TOTAL SPAN OF LIFE ON EARTH. THINK BACK. WHERE WAS THIS COUNTRY IN WORLD LEADERSHIP ONE HUNDRED YEARS AGO? WHEN DID WE GAIN OUR PRESENT POSITION AS A MAJOR WORLD POWER AND HOW LONG CAN WE MAINTAIN THAT POSITION?

WE HAVE MUCH FOR WHICH WE CAN THANK OUR PREDECESSORS; HOWEVER THEY WERE NOT PERFECT. THEY MADE MISTAKES, AS DO ALL HUMANS, BUT MUST WE REPEAT THOSE MISTAKES TIME, AFTER TIME, AFTER TIME. WHY DO WE STUDY HISTORY AT ALL IF NOT TO LEARN FROM PAST MISTAKES. "EXPERIENCE KEEPS A DEAR SCHOOL, BUT FOOLS WILL LEARN IN NO OTHER". IT IS ONE THING TO SURVIVE AN ECONOMIC DEPRESSION YET QUITE ANOTHER TO RECOVER FROM AN ECOLOGICAL DEPRESSION WHERE WE HAVE OVEREXTENDED THE CARRYING CAPACITY OF THE ENVIRONMENT, EXHAUSTED NATURAL RESOURCES AND UTTERLY DESTROYED OUR CHANCES FOR WORLD LEADERSHIP. IT IS HIGH TIME WE TOOK A GOOD LOOK AT OURSELVES. HAVE WE NOT BEEN LIVING RATHER "HIGH OFF THE HOG" SINCE WORLD WAR II? -MOST OF IT ON BORROWED MONEY. TAKE A LOOK AT THE NATIONAL DEBT. IT IS NOW TIME TO PAY. WE ARE EITHER GOING TO GRADUALLY REDUCE OUR LIFE STYLE AND STANDARD OF LIVING WHILE THERE IS STILL TIME OR WE WILL COME DOWN WITH A CRASH, THE LIKE OF WHICH THIS COUNTRY HAS NEVER SEEN. I ASK YOU, WHEN OUR NATURAL RESOURCES ARE DEPLETED, WHO WILL "BAIL US OUT"? WILL IT BE RUSSIA? AND IF SO AT WHAT PRICE?

IF WE ARE REALLY GOING TO DO ANYTHING ABOUT AVERTING A MAJOR ECOLOGICAL COLLAPSE IN THIS COUNTRY, WE ABSOLUTELY MUST DEVELOP A MORE CONSERVATIVE PHILOSOPHY REGARDING OUR LIFE STYLE. THE REAL QUESTION BEFORE US TONIGHT IS WHETHER OR NOT WE TAKE A STAND HERE TOWARDS ADOPTING THAT MORE CONSERVATIVE LIFE STYLE.

THE DRAFT ENVIRONMENTAL IMPACT STATEMENT BY THE UNITED STATES ARMY CORPS OF ENGINEERS IS BASED LARGELY ON MATERIAL PREPARED FOR MALL PROPERTIES, INC. AND AS SUCH TENDS TO FAVOR DEVELOPMENT OF THE MALL IN ALL INSTANCES. QUESTIONABLE HARMFUL IMPACTS ARE MINIMIZED THROUGHOUT THE STATEMENT, SUCH AS TEMPORARY DISPLACEMENT OF WILDLIFE. FOR MOST FORMS OF WILDLIFE THE DISPLACEMENT WILL CERTAINLY BE PERMANENT. THE MOST HARMFUL EFFECT TO WILDLIFE IS THE DESTRUCTION OF HABITAT AND THE REPLACEMENT OF A FEW TREES AROUND THE PERIMETER OF A NOISY SHOPPING CENTER WILL NOT TAKE THE PLACE OF A REALATIVELY QUIET ECOTONE. THE IMPACT OF FLOODING AND TRAFFIC ARE BOTH LARGELY BASED ON EXTRAPOLATION AND AS SUCH TEND TO BE MISLEADING. IT MIGHT

BE WISE HERE TO STATE FOR THE RECORD THAT IF ANY WORSENING OF FLOOD CONDITIONS OCCUR, IF THIS MALL IS BUILT, THEN THOSE PARTIES RESPONSIBLE FOR BUILDING OR ALLOWING THE BUILDING OF THIS MALL SHOULD BE LIABLE FOR ANY DAMAGES RESULTING FROM SUCH WORSENING OF ~~FLOOD~~ CONDITIONS. ON THE OTHER HAND BENEFITS TO THE GENERAL PUBLIC ARE CERTAINLY NOT MINIMIZED AND AGAIN BASED LARGELY ON EXTRAPOLATION. IT DOES NOT SAY WHAT WILL HAPPEN IF WE ARE PRESENTLY ON THE VERGE OF AN ECONOMIC DEPRESSION.

IS THIS THE TIME TO GAMBLE ON SO LARGE AN UNDERTAKING? OUR TAXES ARE THE LOWEST IN THE AREA NOW. WHAT IS THE RATE OF PEOPLE GOING OUT OF BUSINESS TODAY? DO WE REALLY NEED THIS MALL? WOULD IT NOT BE LESS EXPENSIVE AND CERTAINLY MORE CONSERVATIVE TO IMPROVE CONDITIONS IN ALREADY ESTABLISHED SHOPPING AREAS.

THE PROBLEMS OF MANKIND ARE NOT GOING TO BE SOLVED BY COMPETITION. SELFISHNESS AND GREED ARE BASED ON A COMPETITIVE INSTINCT FOR SURVIVAL. ALL LIVING THINGS MUST COMPETE TO SURVIVE. OUR TROUBLE IS THAT WE COMPETE SO SUCCESSFULLY THAT WE ARE GOING TO COMPETE OURSELVES RIGHT INTO EXTINCTION. THE ONLY REAL ANSWER TO OUR PROBLEMS IS COOPERATION, NOT COMPETITION. HOW WE ARRIVE AT THIS WITH OTHER COUNTRIES LIKE RUSSIA IS A REAL QUESTION, BUT AT HOME WE SHOULD BE WELL ON THE WAY BY NOW.

DO WE LIVE BY COMPETITION ALONE IN OUR SOCIETY? DO WE ALLOW THE OLD, WEAK, SICK AND POOR TO JUST DIE? WHAT ABOUT THE BUSINESS WORLD? WHAT ABOUT FEDERAL AID TO THE CHRYSLER CORPORATION? ACCORDING TO THE PHILOSOPHY PERMEATING THE BUILDING OF THE NORTH HAVEN MALL, THE ANSWER TO THE SLUMP IN THE AUTOMOBILE INDUSTRY WOULD BE TO FORM AN ADDITIONAL NEW COMPANY, BUILD ANOTHER MUCH LARGER NEW PLANT AND MANUFACTURE EXACTLY THE SAME KIND OF CARS THAT ALL THE OTHER COMPANIES ARE PRODUCING. PLEASE THINK ABOUT THAT FOR AWHILE.

RESPECTFULLY SUBMITTED,

Calvin D. Haseltine

CALVIN D. HASELTINE

P17 5/9

38 Blakeslee Avenue
North Haven, Conn. 06473
March 26, 1982

Mr. Robert DeSista
Department of the Army
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02154

Dear Mr. Desista:

This will probably be my last letter to you regarding the North Haven shopping mall. At last Wednesday's hearing, March 17, 1982, Mr. Eugene Seder a reporter from the New Haven Register said that the main reason Mall Properties, Inc. has not given up on this project is because of the tax write-off. In reading the paper next day, Colonel Rappaport was quoted as saying that "the U.S. Army Corps of Engineers did not have enough money to do an environmental impact study on its own" therefore, they did rely on the study done for Mall Properties, Inc. and if those opposing the mall wanted a study done, they would have to pay for it themselves. It would be wise for the Corps of Engineers to look into the tax-write-off statement because, if it is true, then, in essence, the general public is being asked to pay twice for two reports. If the money to pay for the report done for Mall Properties, Inc. has in fact been made available because of tax write-off, then the report done was at the expense of the general taxpayer, many of whom do not consider it in their best interest.

I am enclosing a copy of a letter I received after the first vote taken by the North Haven Inland Wetlands Commission on the North Haven Mall. At the time I also received a number of phone calls and other verbal statements commending me for the position I had taken. Enclosed is a copy of one such letter.

Please deny a permit to fill. The mall is definitely not in our best interests.

MAR 31 1982

Sincerely yo
Calvin D. Haseltine
Calvin D. Haseltine

Mrs. Carmine N. DiBattista
59 Surrey Drive
North Haven, Connecticut 06473

Sept. 20, 1974

Dear Mr. Haseltine,

I was not surprised at the vote of the Inland Wetlands Commissions for the Mall proposal. It was very apparent at the public meeting that opposition was not wanted. It is disappointing to know that most of those commissioned to preserve our wetlands are swayed by politics and money. Thank you for having the courage to oppose this flagrant miscarriage of duty by your fellow commissioners.

Hardship of the order necessary to consider destruction of such a large parcel of wetlands certainly does not exist in North Haven. There are numerous shopping facilities within reasonable distance, and many stores in North Haven itself are empty.

It is frightening to see that those entrusted with North Haven's welfare are so politically motivated. It is equally refreshing to find a few, like you, who are willing to uphold moral principles. Thank you again.

Sincerely,

Marsha DiBattista

320

P18 521

STATEMENT TO ARMY CORPS OF ENGINEERS

PUBLIC HEARING ON PROPOSED NORTH HAVEN SHOPPING MALL

MARCH 16, 1982

I am Diane Hatch-Mangine and I live at 104 Shawmut Avenue, North Haven.

The following statement was written by a resident of West Hartford and describes what it's like to live near a mall. Her experience is relevant to the issue of the North Haven Mall and speaks to the types of problems the draft EIS calls "insignificant" or "nominal".

"My name is Carole Lundeberg and I live within walking distance of West Farms Mall (unfortunately). Since the developer of the North Haven Mall has compared it to West Farms, I would like to discuss the impact West Farms has had on our area specifically, and the region in general.

Typical traffic engineers addressed homeowners prior to the Mall development and stressed statistically and theoretically how the traffic would easily be absorbed by existing streets. Apparently their computer had a headache when they made their computations because everyone complains about how traffic problems have been augmented since West Farms Mall.

Traffic on South Main Street near the Mall has increasd from 12,000 cars/day to 19,000 cars/ Traffic

on a smaller residential street leading to the Mall (Ridgewood Road) has increased 127% on weekdays (from 2600 cars to 5900) and 182% on Saturdays (from 2400 cars to 6800).

An increase in traffic brings an increase in air pollution. It is a fact that the worst pollutants are generated when cars are queued up and idling, which is the situation on all roads leading to the Mall.

The developer in his pitch assured us that his hydraulic engineers had worked out a drainage plan that could accommodate a "100 year storm". Well, almost no one had water in their basements before the Mall but almost everyone had it after. After such a large area is paved where can all the runoff go after a storm?

Our police department was overworked before West Farms Mall. Now it has the additional responsibility of covering the Mall and its shoplifting cases, forgeries, and the overabundance of stolen automobiles. Also whenever a fire truck is dispatched to the Mall two police cars must accompany it.

Its economic impact is far reaching, affecting shopping areas in Hartford, Newington, and other parts of West Hartford. West Hartford center merchants continuously try promotions to encourage people to come back to shop in the center.

Bishops Corner on the North end of West Hartford has Lord and Taylor as its drawing card. However, when Lord and Taylor announced tentative plans to move to West Farms Mall, Town officials tried to encourage them to stay where they are because they felt if Lord and Taylor moves out, the rest of the Bishops Corner will be doomed as a viable shopping center. Unfortunately the magnetism of the West Farms Mall was too great, and Lord and Taylor will be at the Mall soon.

Although property values have increased all over town with our recent revaluation they did not increase to the same degree in our area as they did in other parts of West Hartford. In fact a developer recently tried to rezone 14 acres of residential property left in our area to business zone. His argument was that no one would want to build homes in this area now because of all the traffic and congestion. Some people will say "If you don't like it, leave." If only we could, but it isn't that easy.

Tax revenue from the Mall can in no way compensate for its effects on West Hartford and the environs."

Carole Lundeberg
5 Regency Drive
West Hartford

P19 324

15 Bishop Street
North Haven, Connecticut 06473
March 22, 1982

Mr. Robert DeSista
Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. DeSista:

I have a question in regard to project number NEDOD-R-13-79-561.

On page III-8 of the draft EIS, reference is made to the highway project improvements planned for Bishop Street, Washington Avenue, and Clintonville Road wihch will releave current congestion. Yet the transportation statistics presented in the transportation section of the draft EID (Table 7) indicate a D level of service will exist at the intersection of Clintonville Road and Washington Avenue.

Will the ARmy Corps include in its final EIS exactly what highway improvement project is planned for Clintonville Road and how much improvement in the traffic flow can be expected from this Clintonville Road project, given that the level of service for the Clintonville Road/Washington Avenue intersection is to be D?

Sincerely,

Dennis M Kennard

Dennis M. Kennard

MAR 25 1982

a. Hearing

P20

525

15 Bishop Street
North Haven, Connecticut 06473
March 16, 1982

U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Re: NEDOD-R-13-79-561

Gentlemen:

The attached comments are the text of my presentation submitted at the public hearing in North Haven in regard to the permit required by Mall Properties, Inc. regarding the mall proposed by Mall Properties for construction in North Haven, Connecticut.

Sincerely,

Joanne Kennard

Joanne Kennard

/jk

enclosure

Although the proposed mall would generate 42,000 vehicle trips per weekday and 56,000 vehicle trips on Saturdays, one of the contentions presented by the mall planners in the draft EIS and echoed by the North Haven town officials is that we residents of the Town of North Haven will be affected minimally by the mall-generated traffic due to this mall's proximity to two major highways, I-91 and Rt. 15 (The Wilbur Cross Parkway).

According to the draft EIS, a great deal of the mall-generated traffic would come off the I-91 exits and The Wilbur Cross Parkway exits. But the percentage of traffic increase on those highways <u>will not be as high</u> as the percentage of traffic increase on some of the residential streets in the Town of North Haven.

Percentage of traffic increase regarding residential streets is mentioned in the "Abstract" of the draft EIS. According to the "Abstract": "Some neighborhood residential roads serving as access routes [to the mall] would experience a fifteen to twenty-five percent increase in traffic (Bishop Street more-so). . ." But the actual figures found on page 39 of Appendix H, Transportation, for the year 1985, indicate much greater percentages of increase will take place on residential streets. According to the figures on page 39, residential Maple Avenue south of Broadway will experience an increase in traffic of 35%, a much greater increase than the 15-25% increase indicated in the "Abstract". Davis Road at the Hamden town line will undergo an increase in traffic volume of 36%; Clintonville Road will undergo an increase of 23-25%. The Hartford Turnpike will experience a 19% traffic increase; Blakeslee Avenue will undergo a 20% increase, and Bishop Street west of Hartford Turnpike will experience a 51% increase in traffic. (This is the section of Bishop Street not under consideration

for widening.)

And you residents who live on those streets that I have not mentioned would also be affected as themall shoppers use such streets as Pool Road, Ridge Road, Upper State Street, and your street to get to these mall access streets, so a great number of us residents of North Haven would be affected significantly by the mall-generated traffic. And these are just residential streets I am talking about now; I am not including the percentages of increase along State Street, Washington Avenue, Dixwell Avenue, etc.

But increased traffic (with its resultant loss of privacy and additional noise, air pollution, and dirt) isn't all those of us on mall access streets and feeder streets would have to look forward to if the mall were to be built. We could look forward to decreased property values as well. Let me explain.

When the assessor from the firm hired by the Town of North Haven came to my home, I spoke to him about the proposed mall and the increased traffic it would generate. He said to me: "The first thing you have to do, the minute the mall should go through, is to go to the tax office and request a lowering of your assessment as your property value definately will be affected."

In light of the percentages of traffic increase to be expected for those of us on mall access streets, I am requesting that in its final statement the Army Corps of Engineers specifically address the following:

1. The percentages of increase in traffic volume to be expected on the mall access streets which are listed on page 39 of Appendix H, Transportation;

and 2. The relationship between these percentages of increase and the anticipated property values for the streets affected.

Thank you.

P 21 528

Joanne Kennard
15 Bishop Street
North Haven, Connecticut
March 22, 1982

Mr. Robert DeSista
Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. DeSista:

The following comments regard the fill that would be required if the proposed North Haven shopping mall were to be built: (project number NEDOD-R-13-79-561)

On page IV-1 of the draft EIS the amount of fill that would be needed for the mall site is discussed. According to these statistics, 675,000 cu. yards of fill will be obtained from the site itself, leaving 380,000 cu. yards of fill to be acquired additionally. According to the draft EIS, there are no known borrowing sites left in NOrth Haven and no borrowing sites have as yet been determined to satisfy the proposed mall's need for fill. Will the Army Corps investigate where this fill might come from and what areas will be directly or indirectly affected by the procurement of this fill, and will the Army Corps include these findings in the final copy of the EIS?

Although the amount of fill required for the site is discussed in the draft EIS, the amount of fill necessary to construct and widen the roads that will lead to the mall site (Valley Service Road, Mall Drive, the jughandle) is not included in the draft EIS. As the amount of fill required for the road widening and construction will be considerable, will the Army Corps investigate these fill requirements and the potential sources of fill available and include these findings in its final draft of the EIS?

The draft EIS does state on page IV-13 that Bishop Street, Hartford Turnpike, State Street, etc. are potential local streets that will be utilized as fill-truck routes. The Hartford Turnpike is posted with "No Truck" and "No Thru Truck" signs; Bishop Street is posted with "No Thru Truck" signs. "No Thru Truck" signs, according to the North Haven Police Department, mean that only those trucks based in North Haven with a destination in the Town of North Haven can use such posted streets. If fill were to be brought in from out of town sources by way of these streets, the residents of these streets will be subjected to noise, dirt, road and home damage they are not protected from by the truck prohibitions currently in effect on these streets. Is the Army Corps aware that these streets are now closed to "thru trucks", and will it investigate alternate streets for the mall's developers to use and include these findings in its final draft?

MAR 26 1982

Sincerely,

Joanne Kennard

March 16, 1982

P 22 579

U.S Army Corp's Engineers
724 Trapelo Rd.,
Waltham, Mass

Dear Mr. Adler:

The Impact Study in regard to Prone Property Flooding, is in error.

Upper State Street, Properties, number 10 to 92 are Flood Prone Properties, were left out of map. Numbers 2A - 2R - Barton Street left out, excluding a Ravine which fills up over half full, River Flooding time - names Paula Di Chello. 2A - Mrs Anne Mastrianni Kazietch 2R - River has Flooded to her house.

Valley Service Road - Farmhouse owned by name Di Chello - You have Flood Pictures of this Flooding -

My letter explains all - I fought for Flooding - pictures. I am in shock - we were overlooked.

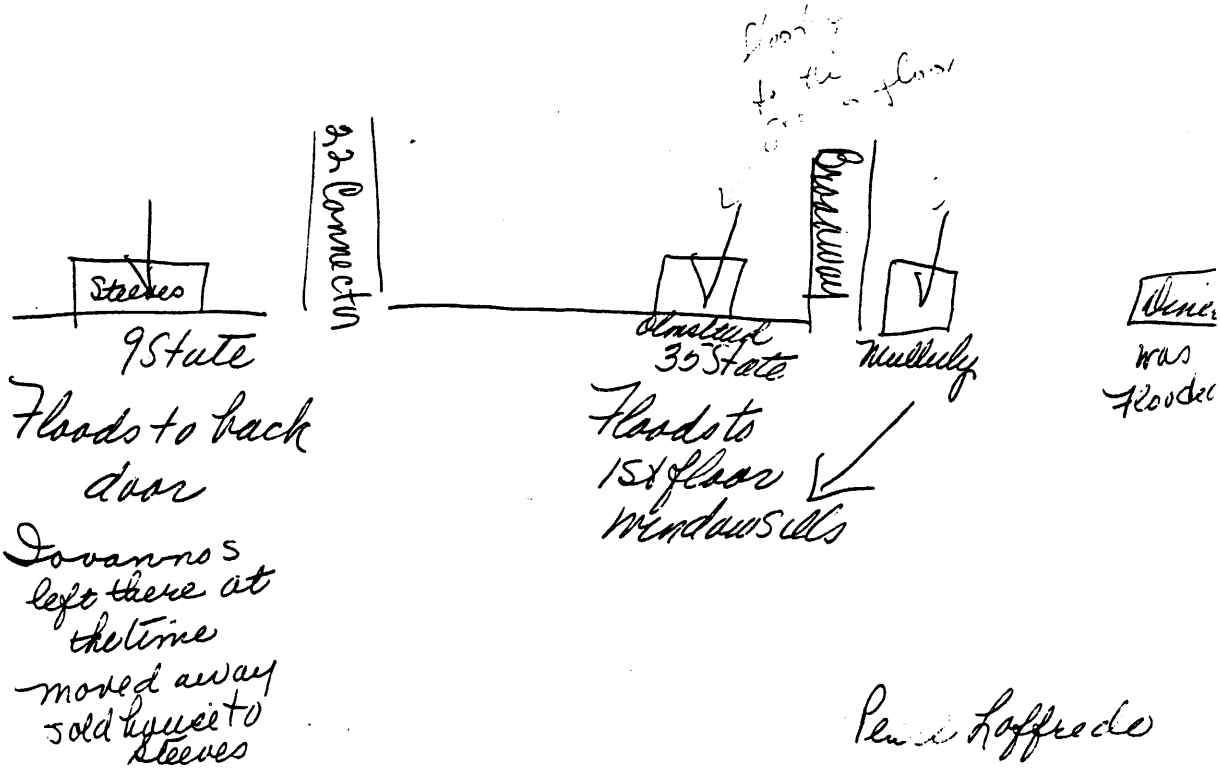
Truly yours,
Pearl Loffredo,
86 Upper State St -
North Haven, Conn
06473

Flooding - Pearl Loffredo
10 - 92 Upper State St
all have flooding in back
except Werner Fusco -
66 Upper State
very high ground

Quinnipiac River at one time
took a different course -
maps can be compared

Building Merritt Pkwy -
certain area in Wallingford -
North Haven - State filled in
along River - a neighbor at
11 Southgate Lane - W. F. Pullano
worked on project mid 40s

Mr. Adler



Pearl Loffredo

My name is Pearl Zoffredo. I live at 86 Upper State Street in North Haven. I am a Member of Stop The Mall - C.C.A.G. (P23) 531

I am distressed to learn my Property was omitted from the Army Corps' Draft EIS Map of Flood Prone Properties. The Flooding problems of persons living on Upper State Street, Banton Street and the Valley Service Road were also omitted. Nothing was said of Flooding in the State Park or on the Wilbur Cross Parkway.

The existing State Flood Encroachment Line hugs the River Bank at the Mall Site. It was drawn parallel to the River Berm before the Berm was broken. Hydrologists at the U.S.G.S. once told the Stop The Mall that because the Town broke this Berm on which the State Line was based, the Line should be redrawn to run alongside the Valley Service Road and include the Mall Site.

The Flood Encroachment Line used for the Army Corps' Flood Study is almost identical to the State Line. If the U.S.G.S and the DEP admit there is reason to justify changing the State Line, perhaps the Encroachment Line used by the Army Corps' also needs revision.

A change in this line would also concern the Site of the jughandle without which the Mall cannot be built.

The Wallingford Dam collapse in 1979. However, it is not the cause of our Flooding situation. Flooding along the River has steadily worsened because of Development since the sixties. This is why Banton Street, once a thriving neighborhood, was condemned.

I am asking the Army Corps' tonight, to please perform a more thorough study of the Flooding. Please assess whether or not the Encroachment Lines need to be changed, and focus on the Mall not as a single parcel to be filled, but the begining of large scale Development along the Flood Plain.

I am also presenting to you another set of photos which depict the Flooding in the area, and two letters from Flooded neighbors. I also have an album of photos which show Flooding here as far back as 1966. I would like your Engineers to come to my house sometime to see them.

Thank you!

86 Upper State Street
North Haven, CT 06473
March 16, 1982

Re: North Haven Mall hearing in North Haven, March 17, 1982, statement presented at the hearing.

My name is Pearl Lofreddo. I live at 86 Upper State Street, North Haven. I am a member of Stop The Mall/C.C.A.G.
I am distressed to learn my property was omitted from the Army Corps' Draft E.I.S. Map of the Flood Prone Properties. The flooding problems of people living on Upper State Street, Banton Street and theValley Service Road were also omitted. Nothing was said of flooding in the State Park or on the Wilbur Cross Parkway.

The existing State Flood Encroachment Line hugs the river bank at the Mall site. It was drawn parallel to the river berm before berm was broken. Hydrologists at the U.S. Geologic Service once told the Stop The Mall group that because the town broke this berm on which the state line was based, the line should be redrawn to run alongside the Valley Service Road and include the Mall site.

The Flood Encroachment Line used for the Army Corps Flood Study is almost identical to the state line. If the U.S.G.S. and the Department of Environmental Protection admit there is reason to justify changing the state line, perhaps the encroachment line used by the Army Corps also needs revision.

A change in this line would also concern the site of the proposed jug handle, without which the Mall cannot be built.

The Wallingford Dam collapsed in 1979. However, it is not the cause of our flooding situation. Flooding along the river has steadily worsened because of development since the sixties. This is why Banton Street,once a thriving neighborhood, was condemned.

I am asking the Army Corps tonight to please perform a more thorough study of the flooding. Please assess whether or not the encroachment lines need to be changed, and focus on the Mall not as a single parcel to be filled, but the beginning of large scale development along the flood plain.

I am also presenting to you another set of photos which depict the flooding in the area, and two letters from flooded neighbors. I also have an album of photos which show flooding here as far back as 1966. I would like your engineers to come to my house sometime to see them.

Thank you.

Pearl Loffredo

Pearl Loffredo
Member of Stop The Mall-C.C.A.G.

P24A 533

March 27, 1982

Mr. Robert E. Adler
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02554

Dear Mr. Adler:

I am very much opposed to the proposed North Haven, CT Mall for many reasons. Some of these reasons have been expressed far better and in greater detail by others. Therefore, I will outline here only some of my concerns which I hope will be addressed in the final Environmental Impact Statement.

1) There is no public need for the proposed development. The proposed mall is not a productive enterprise; its existence would add nothing new to the economy beyond the building itself.

2) In his attempt to sell his proposal, the developer has not distinguished between pecuniary benefits and real benefits. The main reason for this, I would guess, is that the real benefits, beyond the construction phase, are slight. The mall will succeed at the expense of the rest of the regional economy. People will not suddenly have more money to spend (at the mall) than they would have if it were not built. A great part of the money spent at the mall will be diverted from existing establishments. As you know, there is disagreement as to the extent of that diversion.

3) The developer has attempted to show that none of the negative impacts is, by itself, significant. He then concludes that the total negative impacts are insignificant. It is more reasonable to draw the opposite conclusion that the negative effects, taken together and over time and even as shown in a relatively good light by the developer's consultants, would have an irreversible and detrimental effect on the region. After all, we can't separate the effects once the mall is built; we must live with them all.

The initial technical memoranda submitted by the developer include so many examples of bias in favor of the project and omit so many negative effects that the validity of the conclusions (particularly in the Economic and Land Use, Transportation, and Community and Visual Quality memoranda) must be questioned. The attitude of the developer is a

portent of what the mall will offer: big money that has no intrinsic interest in the North Haven community and that will feel justified in "paying its dues" through its (deductible) tax burden without partaking in the life of the town. Once the mall is built, the town of North Haven will be at its mercy. I don't believe the townspeople are really aware of the tremendous impact a mall would have on this community.

4) The argument is raised: "Why should the federal government be involved in such an issue? Can't the marketplace decide for itself whether or not the mall would be a good project?" The marketplace does not always know what is best, and at times the government must step into protect people from unwise decisions. Frequently the government is in the position of providing for the public interest even though there is insufficient public demand to make a service profitable in the private sector - such as public transportation subsidies or water management facilities. Our economic system is dependent on various tax breaks to induce one kind of investment or another - another kind of subsidy. The case of the proposed mall, where there is an apparent demand for the facility, but no great need, represents the other side of the government's responsibility. To allow it to be built undermines the values to which our government is committed, including the revitalization of urban centers.

Free enterprise does not mean unchecked development at any cost. We have gone beyond that era, and now recognize the need for a coherent plan for development, for preservation and progress. When does the marketplace cry out for preservation of a resource (e.g., wetlands, historic buildings, greenbelt, clean air and water)? Not until the resource is threatened by destruction. At this point, there is a real need for the government to protect our resources from inappropriate projects. There isn't much money to be made in saving our resources, so private enterprise doesn't get involved. There are no tax incentives for citizens who fight for rational and appropriate development. That is one reason why the federal government must be responsive, must steer us on the course that will help us reach our policy goals.

I urge you to recommend that the permit be denied.

Very truly yours,

Anne H. Magoun

Anne H. Magoun
24 Lancelot Drive
North Haven, CT 06473

535

I am opposed to the construction of the proposed North Haven mall.

Personal Comments: From the comments heard at tonight's meeting I believe the Corps has not adequately & accurately studied the economic & environmental issues. A smaller mall (1/2 the proposed size) would provide economic benefit to North Haven not have severe environmental impact and also not have severe economic impact on Hamden & New Haven.

Name and Address: Christina Krashan
545 Dunbar Hill Rd
Hamden, CT 06514

P24

I am opposed to the construction of the proposed North Haven mall.

Personal Comments: The DRAFT EIS does not adequately address the major issue of the mall's potential impacts on North Haven. Traffic, archeological impacts and air quality issues are glossed over. The Corps has a responsibility to seek our objective information, beyond the self serving developer's reports.

Name and Address: Anne Magoun
24 Lancelot Drive
North Haven CT 06473

P25

I am opposed to the construction of the proposed North Haven, CT mall.

Personal Comments: THE PROPOSED PROJECT IS THE WRONG PROJECT IN THE WRONG PLACE AT THE WRONG TIME. I STRONGLY URGE THE CORPS TO PERFORM AN UNBIASED, PROFESSIONAL EVALUATION IN PLACE OF THE CURRENT, HEAVILY SLANTED (YOU USE THE DEVELOPER'S TEXT AS FACT IN SEVERAL PLACES) DRAFT EIS. BE PROUD OF YOUR JOB. BE UNBIASED. BE, ABOVE ALL, PROFESSIONAL.

Name and Address:
PETER R. MAGOUN
24 LANCELOT DRIVE
NORTH HAVEN CT 06473

Attachments are non-specific to DEIS 536

P26

Mary Mahon, North Haven Conservation Commission
91 Shawmut Ave., North Haven

I am speaking for the minority position on the North Haven Conservation Commission's motion taken March 3, 1982 at a special meeting which reads: "The North Haven Conservation Commission endorses the issuance of a permit to place fill in about 25 acres of wetlands and water courses in conjunction with the development of the North Haven Mall."

We, the minority, do not support the motion because the U. S. Army Corps of Engineers Draft Environmental Impact Statement of the North Haven Mall does not prove to us that significant impact will not be imposed on the North Haven Community, particularly in the areas of water resources, water and air quality. As conservationists we cannot support a permit that allows the filling of 25 acres of wetlands. Although the study points out that the site's ability to store flood waters has been shown to have no measurable impact upon flood levels because of the clay-containing soil, the 25 acres of wetlands do act as flood water storage during heavy rain storms. The draft Review Section 404 (b) (1) on page III-7 was based on 6-months and 1-year flood events, but North Haven has experienced greater flood producing storms. It notes that Three feet of flood water during 100-year floods was calculated. There is too broad a range between 1-year and 100-year flood events. The run-off from the parking lot will eventually reach the Quinnipiac River. The Conservation Commission has had a goal to improve the Quinnipiac River to the State of Connecticut's goal of "B" quality by reducing the influx of pollution, not increasing it.

The approval of the filling of these wetlands is another step towards the building of the mall which will produce an extreme increase in pollution-prod[illegible]g traffic.

In The draft's Section 404 (b)(1) Review, Table 7 Mall Access Intersections level of service shows that the intersection of Rt.22, Clintonville Rd. and Washington Ave., without the Mall is rated D which is a high level traffic area. The Review also states that local traffic would increase on some residential roads. North Haven's topography produces a thermal inversion during high-humidity seasons, which traps air pollutants.

The impact of a development of such magnitude will have an irreversible negative effect on the town of North Haven's environment. The tax income, which is based on current service levels, will not balance the downgrading of our land, water and air quality.

In October, 1972 the North Haven Conservation Commission voted against the proposed development of a large mall in the Quinnipiac River area. In the ten-year span 1972-82, the Conservation Commission has had correspondence with the Mall developers, North Haven's Planning and Zoning Commission, the State Department of Environmental Protection, State Traffic Commission, the Department of Transportation, Army Corps of Engineers, and the Governor of Connecticut -- stating the Commission's concerns for the environment of our community.

Lettitia MePhedran
Arthur Ross
Mary Mahon
(members of the North Haven
Conservation Commission)

P27

538

Comments at the Army Corps Hearing March 17, 1982

I am a student at North Haven High School and the immediate past president of the North Haven High School's Student Council.

One problem not adequately considered in the Draft EIS is the potential loss of taxes to North Haven. The mall will duplicate many existing stores and force them out of business, resulting in loss of tax revenue to the town. Previous speakers have cast doubts on the amount of taxes gained in the first place, but the mall will represent certain loss of revenue.

The Final EIS should make some estimate of lost revenue to the town when Washington Avenue and other area stores start going out of business because of the mall's construction.

There have been many reasons cited to oppose the North Haven mall. The negative effect on existing businesses and the resulting loss in tax revenue should be another reason for the Army Corps to deny the permit for the proposed North Haven mall.

Charley McPhedran

Charley McPhedran

21 Central Ave

North Haven, CT 06473

Int Rapaport.

My name is Peter McPhedran. I live at 21 Central Avenue in North Haven, and I am a member of the North Haven Board of Finance. I am speaking for myself as a minority member of the board most concerned with North Haven's financial future ~~and at least partly for the other minority member of that Board~~. I am opposed to the construction of the proposed mall.

I have to admit that the financial argument for the mall sounds attractive for North Haven. We read in the summaries of the proposal, and in the newspapers, that this project will generate $1,000,000 in revenues to the town, and that property taxes will be reduced by 6 %. However that is a wish, not a guarantee. If we look at the Economic Appendix, Appendix L, on page 74 we find that the developer actually guarantees a sum of $350,000 in the first tax year. Town expenses for the project for that year are estimated at $250,000 for debt srrvice and $100,000 in mall related public safety expenses, in other words, a break even situation in 1985. The guarantee increases to a mere $150,000 annual net in the 12th year in 1997. So the Army Corps should not conclude that environmental costs are sure to be offset by tax receipts. If the taxes should come in at the lower end of projections, hard times, the town may actually be losing money on uncounted expenses, such as accelerated need to establish new land fill.

The need for this project is argued in the Draft EIS by the present occurrence of a $66,000,000 "leakage" in sales receipts from metropolitan New Haven. If we build the mall, the leakage will stop, we will be able to tax the resulting business and generate new jobs in North Haven. Sounds great. No more driving to get to the department store, and lower taxes. However, there hasn't been any population growth in the area. The business and jobs gained here will hurt our neighbors financially, and this huge development will hurt us with traffic and air pollution. I would urge that the Army Corps reject the mall as currently proposed and that we reconsider the small mall approved by North Haveners in 1973.

Peter McPhedran M.D.
March 16, 1982

P29 540

March 26, 1982

Robert Adler
New England Division
US Army Corps of Engineers
424 Trapelo Road
Waltham, Mass. 02154

Re: North Haven Mall:
1) air pollution
2) general comments

Dear Mr. Adler:

I participated in your March 16 hearing on the North Haven Mall. At the hearing, I made some comment on the likely economic effects of the Mall, since I was speaking as a member of the North Haven Board of Finance. To summarize, I felt that environmental damage should not be considered repaid by the predicted tax benefits, since repayment beyond debt service and police and fire increases is not guaranteed by the developer (see page 74 in Appendix L). I felt that the permanent jobs accruing to North Haven would be taken from neighboring towns and that it didn't make it all right to say, as Appendix L does, that most of the economic damage would be outside of the (census) metropolitan area. These issues may be of more importance to town-speople than the ACE. The reviewers of this project may feel pressured by the developer's prediction of enormous local economic benefits. They shouldn't be.

I wanted to touch on two other matters, as well: air quality, as I am a physician, and air quality is really my main worry, and some general concerns about the reliability of the evidence presented to the ACE, and ACE's view of the obligations of contending groups in this dispute.

Air Quality

You will find in Dr. Lawrence Solomon's comments at the hearing objections to some of Mr. Raymond Keyes' statements about Mall effects on Air Quality. Mr. Keyes assumes that auto emissions are sure to lessen because of EPA requirements: Dr. Solomon pointed out that the EPA standards have already been relaxed. It is unreasonable to expect less carbon monoxide from the same autos. It is common knowledge that people are holding onto their old cars longer, meaning that lead will persist at or near present levels in auto emissions. The ingestion of lead by children can cause learning disabilities as well as other neurologic damage, and has been the focus of public health attention for more than a decade. The draft EIS should certainly consider lead pollution.

Another assumption made by Mr. Keyes that must be challenged is that the building of the Mall will result in a reduction in auto trips and auto miles. The argument is made in Appendix H that the Mall's bigger concentration of stores will result in 12,000 less trips and miles, because of less driving from store to store. This in turn is based on how much traveling the people expected to use the Mall would have to do, without the Mall, to purchase the $85,000,000 of shoppers' goods expected to be sold annually at the Mall. The suggestion that this large shopping Mall, presently planned to be reached only by car, will lead to a net reduction in miles driven seems absurd on the face of it. What about the people who start out wanting one item they could buy locally, drive to the Mall instead to get it, and wind up doing other shopping too? The longer initial trip to the Mall will result in an actual increase in driving. The other items likely to be purchased when the shopper is among a group of stores contributes to the alternative prediction of additional miles "driving around". This last is speculation on my part, as the exact method of calculating that there will be fewer trips if there is a Mall, is not presented. The point here is that this prediction of 12,000 fewer trips and fewer miles, which I suggest is both speculative and improbable, is then used in the Air Quality section (see Table 7, second sheet after page 22: VMT drops 12,000 with the "Build" option). In Table 7 this figure is used to maintain the reduced pollutant burdens predicted on the basis of an EPA that, in all likelihood, won't have any teeth and may not even exist. Finally, we have seen on pages 14 and 15 (Appendix I), that our central region of Connecticut is already exceeding Clean Air Act standards for particulate matter, photochemical oxidants (hydrocarbons), and carbon monoxide. I submit that it is unreasonable to assume that we will return to safe levels of these pollutants based on laws that are unlikely in the present political and economic climate to be enforced.

General Concerns

1) Others at the hearing pointed out that the draft EIS followed sections of the developer's Appendices, word for word, in many areas. My understanding of the review process is that the ACE is obliged to analyze material submitted to it. Since I know that objections to parts of various Appendices had been submitted to the ACE, the faithfulness of the draft EIS to the developer's submissions concerns me.

2) The New Haven Register quoted Colonel Rapaport as saying he had heard no substantial refutations of the draft EIS in the six or seven hours of the hearing. If the quote is correct (it may not be: the Register seems to be a biassed source in this dispute, while the North Haven Post is, strangely, more objective), I assume he and perhaps the ACE feels that opponents of this project should buttress their arguments with their own detailed studies of Air Quality, Transportation, Economics, and so forth. As everyone knows, the developer has the resources to do that, whereas the opponents do not. The "studies" are just a business expense to the developer, whereas the opponents, who have other jobs, will realize no gain other than protection of the equity in their houses, if the Mall is defeated. We, in turn, realize that the Army Corps of Engineers can't repeat the studies done by the developer's "experts". However, I hope you will listen to our objections where they make sense and review the

developer's Appendices with appropriate caution. There is interesting data in many sections of the Appendices but conclusions of these studies are controlled by who pays the bill. Anyone involved in research knows that research sponsored by persons with a financial interest in the results cannot be unbiassed.

Thank you for a well conducted hearing. The crowd response at the hearing was not necessarily representative of the opinions held by North Haven Residents - many are opposed to the Mall.

Peter McPhedran

Peter McPhedran, M.D.
Associate Professor,
Lab Medicine and Medicine
Yale School of Medicine
(Resident of North Haven)

P29 A

5/3

Edward F. Morrissey
1822 Hartford Turnpike
North Haven, Connecticut 06473

March 22, 1982

Division Engineer
New England Division
U. S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Attention: Mr. Robert Adler, NEDPL-IP

Subject: North Haven Mall

Dear Mr. Adler:

My unease about the North Haven Mall grows much stronger following publication of the Corps impact statement and the public hearings in North Haven on March 17 and 18.

Rhetoric and emotionalism have now clouded an objective look at the benefits and liabilities of the Mall development. I refer specifically to the following matters:

U.S. Corps Impact Statement:

This document and appendices adds to the confusion with its tentative conclusions on traffic, environmental impact and wetlands projection. Moreover, its assessment of economic impact on New Haven and Hamden is marginal at best and exclusive of some recent downtown commercial upgrading.

Incompatability With North Haven Town Plan:

Since 1965 North Haven has had a town plan emphasizing a residential community buttressed by localized industrial expansion. The values of localism, smallness and town integrity are in no way served by a regional commercial development with its attendant draw upon town resources for fire, police and traffic surveillance.

Regional Divisiveness:

For the better part of 40 years New Haven has served as the mercantile hub for North Haven and beyond. Now this central city is threatened by the Mall commercial development. Not only does this trottle the natural interchange between town and city it forces neighborhood to choose up sides. This clearly is unfortunate since city and town cooperation here-to-fore in place is now jepordized.

Clearly you must seat your technical findings regarding the North Haven Mall in the context of real social and political issues. I do hope you will adjust your preliminary findings to acknowledge the "big risk" the Mall has, not only for us today who are concerned, but for future generations as well.

Sincerely,

Edward F. Morrissey

EFM/bcs

P30 5/5

26 Kent Drive
Hamden, CT 06517
March 2, 1982

Dear Colonel Edgar,

I have reviewed the North Haven Mall Draft Environmental Impact Statement. I fully support the Statement's conclusions.

Both as a private citizen who has been waiting a long time for the Mall and as a selectman of the town of North Haven I urge a final approval of the developer's request for a section 404 permit.

While campaigning I

met many North Hanover who asked when will the Mall be built? I hope that we'll be able to answer, "Soon!"

Sincerely yours,

Constance O. Dayton
Selectman

P31 547

125 Kings Highway
North Haven, Conn. 06473

March 18, 1982

Department of the Army
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, Mass. 02254

Attention: Lieutenant Colonel Arthur N. Rappaport
Assistant Deputy Division Engineer

NEDOD-R-13-79-561

Dear Sir,

During the course of discussion on the North Haven Mall, it has been mentioned several times that the regulatory impact study is regional in scope. It must be remembered that North Haven is part of this region and is entitled to the privilege of self-determination. New Haven would have us revert to the caste system with no room for self-improvement.

I am amused by the jingle aired daily on the local radio stations--"Look what we've got in New Haven". I can tell you what they have in New Haven, they have one heck of a mess. Their plight is through no fault of North Haven or any other suburban town. It has been brought about by their own fiscal inefficiency. New Haven has had a direct money pipe line from Washington for the past thirty-five years for its revitalization with no concern for the suburban towns. I don't think there is a city in the United States that has had more money per capita funnelled into it. It is like filling a bottomless pit.

New Haven's salvation will not come from stopping the construction of the North Haven Mall. During the last Christmas season, New Haven television gave out these shopping tips:

1. Ladies should carry their handbags to keep them from being snatched.
2. Do not go into an elevator alone.
3. Park near to the door where it is well lighted.

Until New Haven addresses itself to these problems, no one will shop there.

Also, I would like to mention that the topography of the mall site is not its natural topography. Some fifteen feet of sand was removed for fill to build Interstate 91.

54/P

It has also been noted that indian burial grounds might be on the mall site. For this to be possible they would have had to be buried some fifteen or twenty feet deep. This is most unlikely.

In addition to the benefits of broadening North Haven's tax base and the jobs created by the building of the project, the interim employment benefits which will accrue to young people while completing their schooling before they embark on their own careers will be significant. In light of the above, I strongly recommend your approval of this application.

Very truly yours,

Emilio Parese

Emilio Parese

71 Coventry Circle
North Haven, CT 06473
27 March, 1982

Division Engineer
US Army Corps of Engineers
424 Trapelo Rd.
Waltham, Mass 02254

Re: North Haven Mall
DEIS and
Section 404(b)(1) Review
13-79-561

Dear Colonel Edgar,

Before you at the 16 March hearing I made a number of remarks that I wish to make here in writing. I would also like to place some additional questions before you since I heard no satisfactory answers during the hearing.

As a member of the North Haven Inland Wetlands Commission, a regulatory body, I wanted to make

it clear for the record that the decisions of that commission were opposed, both initially in granting a permit to fill the wetlands and recently in recognizing the complete accuracy of the DEIS report of that action. Especially since the February 1982 vote to, essentially, affirm the 1978 action, was 4 in favor to 3 in opposition, very close despite considerable political pressure to concur, I feel compelled to state the minority view in this matter.

Although I was not a member of the Inland Wetlands Commission in 1978, judging from present sentiment, I doubt that a similar application would receive the same permit. I expect that the commission would require more significant conditions to restrict and redirect the course of development.

Army Corps
North Haven DEIS 13-79-561
page 3

In any event there is a consequential condition in the existing permit which does not appear to be observed. As reported in both the DEIS, page III-5, and in Appendix B, Vegetation, Wildlife and Wetlands, page 14, the developer is to observe "the nondisturbance of 11.6 acres of inland wetlands outside the channel encroachment line." I must question whether the developers design reflects this condition.

Starting from Figure 17, Wetlands - Site Plan overlay, I have an excellent sense of what constitutes definable wetlands. Therefore, when I compare that figure with Figure 6, Site Plan for Proposed Mall, I am most disappointed to not be able to observe <u>any</u> wetlands outside the channel encroachment line which would remain undisturbed. In fact,

Army Corps
North Haven DEIS 13-79-561
page 4

there is only one area of the site that would continue to have the same use/surface, that being a portion of the existing pond which would, in location, become a part of the detention pond in the site plan. Even that area could not be considered "nondisturbed" because creation of the detention pond will require extensive earth moving and grading. So where is the non-disturbed 11.6 acres? Upon reexamination at the regular March meeting of the Inland Wetlands Commission, no member could locate it. Can the Army Corps?

Finally, I have to question whether the secondary effects and transportation modifications effects, in particular, are not considerable. Development that should reasonably be expected to accompany a mall of the size contemplated will

Army Corps
North Haven DEIS 13-79-561
page 5

gradually cover the area between Bishop street/Route 22 and the proposed mall site. I would not be surprised if you were to receive a procession of applications to fill within the encroachment line. I certainly expect to see development extend to the Pratt & Whitney property line. Even with the 100' buffer zone adjacent to the river, as requested by our town's Conservation Commission, I think that secondary development will compromise the river and its flood plain far beyond the mall, alone.

I urge you to find against the applicant and, in any event, expect the Mall Properties staff to locate the lost 11.6 acres for you.

Army Corps
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page 6

In another regard I hold for more concern than even that which I have related on environmental grounds. Your process would have review the effects of development on the character of the town and its neighborhoods. This is purported to be done for you in Appendix M, Community and Visual Quality. In my opinion the work is deficient. The result minimizes the powerful effect the Mall would have on society and culture in the town.

- The researchers claim their methodology proceeded from delimitation of impacts suggested at scoping sessions and rising out of their own experience. Yet the research presented is superficial and mechanistic, never really going beyond vague description and certainly

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not ascertaining the character or culture of the town. Speakers at the scoping sessions certainly tried to express concern about quality of social life. A literature search ought to have pointed up additional effects on cultures of the location of a massive installation right in the midst of a functioning social system. I have not done a lengthy literature search either but I would like to speculate on some negative impacts that might be anticipated from the building of the proposed Mall.

There appear to be two distinguishable primary sociocultural effects. The first has to do with the towns populace in general and the second relates to the youth population.

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First of all it is important to recognize that at present North Haven's social system has relatively little cohesiveness. - the major population gains of the last thirty years have contributed to the fragmentation of social patterns. Some neighborhoods are fairly stable while a couple are still in flux, as is to be expected of a suburban town. Most residents are employed elsewhere with the obvious effect of extratown orientation. - the result is that community institutions are very fragile.

A major mall is an absorbing creature, taking into itself more than shopper dollars. A mall could be expected to usurp or displace a number of social functions that various groups in town are attempting to cultivate.

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By way of a seasonal Example, the local Jaycees sponsor an Easter egg hunt on the town green. The appeal of such a local event wanes when "the Mall" counters with the real Easter Bunny, in living color, arriving in a carriage drawn by ten giant white mice. Nor will the women of town continue their quilting lessons at a local establishment when they can learn from the "quilting superstar" down at Singers in the Mall. Not bad, you say? just different. Well the big thing that is different is that it is families, or children or women from a 20-town area. Sense of locality or loyalty is lost.

Moreover, the new culture is not local, of course, but it is not even regional. Now a new retailer in North Haven learns something of the town, relates to local events and personalities. Retailers in the proposed Mall will

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take their cues from the chains. One can expect the mall to be predominantly national stores that blandly put on a new England facade by handing pictures of Cape Cod. What does that say to people from North Haven, or even Milford or Madison. A mall impoverishes local life when there are customs worth saving.

When you view the impact of a major mall on youth, the influence is even more striking. The mall will be a magnet for the young literally blocking local culture from their minds. The promotion of "positive teen behavior" suggested in appendix M is an illusion. Reference to mall "programs which appeal to teens" will both end existing programs with that goal while providing a convenient excuse to the community for not

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providing additional services or facilities for youth. If it has been difficult in the past for the community to justify bonding expense for such institutions, as a community pool ~~in the past~~, it will be impossible in the future.

Nor is this insight limited to the young. Senior programs may be transferred to mall corridors, woodworking classes given at Sears rather than at the recreation center. With each community-based program lost, the incentive to initiate a new one is sapped. An effort several years old to stage a series of summer concerts for town residents on the green would be doomed by the free entertainment variety down at "glitter palace." Cultural life would surely wither as members of the local arts

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guild participated in shows at the mall rather than putting on their own at the library. Life would get more distant, more artificial, less personal.

And then there would come the secondary cultural effect as the stores in the local shopping area along Washington Avenue falter and fail from unmatchable competition. The town's strip development has been due to initial poor planning but has come a long way in ten years. Once again this visible town represent would have high vacancy and dereliction. The town could view its self-image by looking at the faded Washington Ave. area or go by the Mall for a look at the other world of bustle and success.

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The whole effect would be damaging to the character of the town, hastening the departure of some, discouraging others.

In general the culture which is unique to North Haven would suffer immeasurably by the development of the Mall. A new, impersonal sociocultural environment, inextricably interwoven with mall activities and totally beyond the control of local residents or entities would rise up in its place.

Is this progress when sufficient shopping outlets already exist in the region, when a mall on the scale of that proposed is unwarranted? I think not. The no-build option lives.

Sincerely,
William Parkerton

P 33

45 Round Hill Road
North Haven, CT 06518
March 16, 1982

Col. C. E. Edgar
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

Dear Colonel Edgars:

Twenty eight years ago my husband and I chose to live in North Haven because of what it promised for the quality of our lives. This year I started my first term as an elected member of the North Haven Board of Tax Review, and I submit herewith for the record of the hearings you are holding on the proposed North Haven Mall, my observations from appeals hearings that were held this year by the North Haven Board of Tax Review.

It is a fact that many homeowners who appealed their assessments from the mandated reevaluation specifically cited traffic problems, flooding problems, neighborhood blight, pollution, and business and industrial encroachment as legitimate reasons for their appeals to have their assessments lowered.

It is a fact that to the extent that tax assessment relief was granted for such conditions, the tax burden is, of course, spread among the other taxpayers in town.

It is a fact that reevaluation, such as North Haven has just undergone, is for the stated purposed of assuring equity by bringing all town real property to current market value.

It is a fact that a reduction in the assessment of a piece of property means a reduction in its evaluation, which means a lowered real market value.

On the basis of the forementioned facts, certain consequences must be expected from the projected Mall development. First: residences in the proximity of, and on the many roadways which will be sought out by traffic to the Mall, would be proper candidates for lowered tax assessments.

Second: the market value of such residences would be lowered.

Third: in time the area and extent of property thus affected would surely be widened.

Fourth: any benefits to an affected homeowner from lowered taxes could hardly be balanced against the ultimately depressed price he would realize should he put his home up for sale.

Finally, not only will our houses be worth less because of the Mall, they would also be much more difficult to sell, because the town's character which has lured so many to buy in NOrth Haven, willno longer be a lure to prospective home buyers.

I respectfully request the Army Corps to consider that in our free

enterprise system the homeowner is an investor with rights at least equal to the rights of any other type of real property investor. Indeed, the stability, vitality and integrity of our communities warrant full consideration when public servants make decisions for the public interest.

To read the legal mandate under which the Army Corps is holding these hearings and preparing the impact statement, is to feel reassured that ours is indeed a humane, civilized society of laws.

When citizens pursue their democratic rights under law, there is never a shortage of cynics along the way "to open our eyes" to what they deem our unrealistic expectations because we want our government to work and we participate because we have faith in our system. To the extent that the Army Corps carries out its mandate in exemplary fashion, it will add to the number of Americans whose faith gives them the courage to pursue their rights, and add their strength in defense of our free democratic society.

It is my firm judgement that the proposed North Haven Mall presents forseeable detriment to the quality of life in North Haven and in the entire region. I would like to have our faith in the system renewed by a decision based on a comprehensive, unbiased EIS report which demonstrates unequivocally the integrity and highest calibre of performance by the Army Corps of Engineers.

Please do not saddle us with the irrevocable destruction that the Mall will bring.

Yours sincerely,

Bessie B. Phillips

Bessie B. Phillips

40 Mountain Brook Rd
North Haven CT 06473
March 17, 1982

To Army Corps of Engineers

Subject
North Haven Mall E.I.S.

Gentlemen:

I wish to address the Corps attention to allegations made by officials of New Haven that the Mall's construction will destroy New Haven's downtown retail trade.

More than twenty years ago New Haven became the first city in the United States to receive Federal funds for urban renewal. Since then probably more money has been spent per capita in New Haven than in any other American city undergoing "renewal".

The planners caused whole neighborhoods to be destroyed and replaced with such monuments to futility as the Veterans Memorial Coliseum and Route 34.

Whole blocks of thriving commercial property were leveled and are today empty, as a series of million dollar parking lots.

As a result in part of the Cities activities tens of thousands of people were displaced and left the City to live in suburban communities. New Haven like many cities has become a home for America's poor people.

The City has failed to come to grips with the truths of the past twenty years. It no longer has a large middle class residential population willing to spend its retail dollars in the downtown area.

The existing downtown business community is completely dependent for retail trade on a daytime population of white collar workers who vanish at 5 P.M.

NOTHING NEW HAVEN CAN DO WILL FORCE PEOPLE TO SHOP DOWNTOWN.

The City seems to think the failure of the North Haven Mall will automatically keep its downtown retail trade healthy.

New Haven no longer has that critical mass of middle class residents and daytime workers needed to support an extensive and expanding retail community. The City has refused to reconize this fact. It has not agressively pursued downtown service industry development. It has spent its best efforts on retaining & attracti industrial firms, in the face of Connecticuts rapid economic change from an industrial to a service basis.

The Cities plans for economic revitalization are bankrupt because they seek a return to a past that will never be again.

If New Haven's downtown retail trade dies The North Haven MALL will not be its executioner. The desolate Meriden MALL and dying Layafette Plaza in Bridgeport stand as mute Testimonials to failed urban planning

When reviewing The new material submitted by The City, I ask The Corps to consider its source, a group of failed urban planners.

The presentation by City officials suggests that Mall Properties Inc has erred if not actually lied in the impact studies submitted to the Corps. The City suggests that its data is the correct information. This may be.

Gentlemen, figures don't lie, but liars figure. I would suggest that New Haven has employed at least as many liars as Mall Properties Inc.

Very Truly yours

Joseph Puleo

JOSEPH PULEO

Respond

P 35 568

1107 West Green St. #126
Urbana, Illinois 61801
March, 24, 1982

Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Attention: Mr. Robert Adler, NEDPL-IP

Enclosed is a letter addressing the Draft Environmental Impact Statement for the proposed North Haven Mall in North Haven, Conn.

Overall, the DEIS complies to the CEQ Regulations. However, I wish to address comments regarding those aspects of the statement which I feel may have been overlooked or require additional analysis.

The most disturbing element of the statement is the PURPOSE AND NEED section. The Corps has determined the need for the mall as a "public need for a depth and variety of shoppers goods and merchandise not now available in the New Haven SMSA and to promote an increased level of merchant competition to sharpen and improve retail services to area shoppers". The real purpose appears to be the ability for the developer to increase profits. The request for the permit and hence, the assessment are merely a compliance to the law. The Corps identifies the secondary purpose "to provide goods and services for profit wihin the private business sector". Their secondary puropse is indeed the primary one.

Even more disturbing, is the fact that the subsequent sections of the statement, specifically, the ALTERNATIVES ASSESSMENT and the ENVIRONMENTAL CONSEQUENCES, are discussed in light of the distorted purpose and need. It is hard to believe that the subsequent sections have been evaluated objectively and in the interest of the public if the statement of purpose and need is distorted.

What are the expansion plans in the region now? What is shopping is imminent?

If indeed the provision of adequate retail services and a competitive commercial environment are needed in the region, then the expansion of existing retail centers should have been considered more seriously as an alternative to the mall. I understand that the CBD of New Haven has been looked at as an alternative site, but the alternative of no mall-expand CBD deserves consideration as an alternative. This alternative is particularly important since the mall will draw from the New Haven CBD. It is also very important since New Haven, in conjunction with the Rouse Company, has been looking into the CBD's redevelopment potentials. The assessment presents some information

regarding the revitalization effort, but it appears to be written off because information is lacking to analyze the situation. The potential conflict between a redeveloped downtown in New Haven and the mall, if built, could have significant market effects which should be investigated.

The statement realizes that the mall will detract from the viability of the New Haven CBD and offers a mitigating measure. It proposes an office structure for downtown New Haven. This measure does not consider the infeasibility of such a situation. It is highly doubtful that an office structure will locate in a downtown if the mall is built and the downtown has declined. At a time when downtown revitalization efforts are important for improving the tax-base of municipalities, not only in New Haven but throughout the region, the construction of the mall will significantly hinder such efforts. Granted, the regional tax-base will improve, but how will this benefit compare to the loss suffered by the CBD's? When public needs are considered in terms of publis losses, it appears that only North Haven will gain from such anproposal and the surrounding municipalities will lose. Does the mall justify such losses? The statement should consider such losses and measures to mitigate them.

A second alternative, build mall without affecting wetlands, should have been considered. Under the guidelines of the Clean Water Act, the 25 acres of wetland which would be eliminated by the mall, represent a "special aquatic site". The importance of such a site is not given adequate attention. The developer of the mall indicates that no alternatives are available which would be less damaging to the aquatic ecosystem. However, considerations of such an alternative are not discussed, nor are the reasons for dismissing such an action given. In light of the importance of wetlands; their potential to provide natural purification, their role in flood control and the extensive habitats which they harbor, the large portion of the mall site which is currently wetlands, and the significant alterations which will occur if the mall is built, the statement should consider the build mall without affecting wetlands in more depth. The considerations of such an alternative deserve to be presented in the statement. As a mitigating measure to the alteration of wetlands, "compensatory" wetlands should have been considered. In other words, to compensate for the 25 acres of wetlands which would be disturbed, the developer could purchase or create 25 new acres of wetlands elsewhere.

I feel that the two alternatives which I have described and comments which relate to them, represent essential missing links. The consideration of these alternatives would improve the objectiveness of the statement. I would like to conclude this letter with several comments which relate to specific portions of the statement. Although the following comments do not point out an absence of considerations, they do represent weaknesses of the statement.

First, a glossary of terms would be particularly helpful in this statement. Jargon terms are widespread throughout the statement. They include such terms as: "jughandle", "edge habitat", "hypolimion", "epilimion", "thermocline", "conveyance ways", "Connecticut I & M", "multiplier effect" and others. A brief definition of these terms, possibly as part of the appendix, would make them more comprehensible to the layman.

Second, an invalid comparison has been made in the economics and land-use portion of the ENVIRONMENTAL CONSEQUENCES section. Misleading comparison figures are given in the discussion of the "worst-case" scenarios for the impact of the mall on downtowns. In the retail market analysis, impacts are discussed assuming an annual income growth of one-percent. In the revised data, based on 1980 Census figures, the "worst-case" scenario uses a zero-percent income growth rate. Figures should be adjusted to make a comparison possible.

Third, a weak arguement is presented in discussions of transportation. where issues of energy conservation are concerned. The Corps argues that the mall will minimize auto-trips by combining them, to result in energy savings. Energy savings do not apply to auto generated trips alone. Public transportation represents a significant savings in energy. Eventhough reference is made to public transportation, it is negligible. Considerations should be given to this mode as a potential energy conserving device.

I feel that consideration of these comments would improve the objectivity of the statement and would reveal areas that the statement has omitted.

Sincerely,

Lucia Egle Rimavicius

Lucia Egle Rimavicius

P 36 541

Colonel Rappaport and members of the Panel:

I am Anne Schmalz, a member of the New Haven League of Women Voters. The Corps of Engineers, in its Draft Environmental Impact Statement, did not attempt to verify a need for a new, large shopping mall in North Haven. The two purposes of the proposal are, and I quote,"... to promote private sector business engaged in providing goods or services for profit", and "to satisfy a need in the Metropolitan New Haven area for retail shopping that offers a concentration, depth and variety of shoppers goods and merchandise not presently available." The first purpose is, of course, appropriate for a developer of Shopping Malls. The second is language that is lifted directly from the reports of the Developers, and there is no effort on your part to back it up with facts, figures or evidence of public demand.

Certainly there is a need for North Haven, and for any town, to use its land resources to the best advantage of its tax payers. But is there a need for North Haven, or for any town, to choose that development alternative which combines tax advantages with impacts as detrimental in so many ways ? Does North Haven need to choose a retail alternative for the development of this property ?

Is there a need in our region for a Mall bigger that any other in the state when our region's population is not growing ?

Is there a need for grouping on one site in one town so many stores that are the life-blood of smaller existing shopping centers throughout the region ?

Is there a need for providing new retail jobs in a new place - retail jobs that cannot be filled by the people who will lose their current jobs when stores close ?

Is there a need to "recapture" sales that "leak out" to towns nearby while we lure their potential sales into our area ? Why, in these reports, are we put behind trade barriers erected only for the convenience of statisticians ? The Corps of Engineers must maintain its position as an arbiter of the welfare and convenience of all the people in all the towns, not just those within one statistical or market area. It should not begin its Impact Statement with a presumption of need unsupported

by data or evidence of public demand. The inference is that the Developer's purposes have become the purposes and policies of the Government. Just because someone is there, ready and willing to build a Mall, is a convenient solution for a development problem. We do not have a Jai alai or an International Airport in this statistical area, but that does not mean we need either one.

We would hope that in the final Environmental Impact Statement the U.S. Army Corps of Engineers examines the needs of the region and balances these most judiciously and impartially against the impacts of its permit decisions.

Submitted by Anne Schmalz
110 Linden Street
New Haven, Connecticut 06511

New Haven League of Women Voters

March 16, 1982

P 37 573

4 Bishop Street
North Haven, Conn. 06473
March 24,1982

United State Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Attn: Mr Robert Adler

Dear Mr Adler:

To fill 30 acres of wetlands and cover more than 100 acres with concrete will present problems of flooding, but the consequences of this will be the filling of more wetlands as the development of Vally Service Road is being planned. This area floods right up to the existing road now during heavy rains.

Have you considered what fill is required where the Jug Handle is to be built. This road starts at the east side of the river and if there were a scale on the maps presented by Barkan & Mess Assosiates and included in Parsons Brinkerhoff Quade and Douglas report you might know there is only about 200 ft. between the river and Valley Service Road and a drop of over 35 ft. which will require fill, another area which is also under water during heavy rains,and are you aware the tide comes up this far on the river another thing not mentioned in the report you are using to base your findings.

Please include Bishop Street in your study. If you, for many reasons, can not see the impact of this favorable permit which seems apparent there should be a stipulation whereby DOT should develop their Alternate #5 (Northerly Route) and no more development of Valley Service Road. This northly route will carry industrial traffic and Mall traffic and Bishop Street will have less traffic. When DOT says it is through a State Park this is an undeveloped State Park and is at the very south end. If they should ever decide to develop this park they will not be short too much and they would not be able to extend the park much further south as the land is too wet.

We can not all afford a $500,000 report but please consider what we all have to say.

Very truly yours,

Harold & Ina-Mae Schmidt

P 38 574

Margaret Solecki
1470 Hartford Tnpke., North Haven, Ct. 06473
Resident of the Town of North Haven 38 years

March 16, 1982

NORTH HAVEN MALL

To: THE U.S. ARMY CORPS OF ENGINEERS

I am Vice Chairperson of The Inland Wetlands Commission of North Haven. I have been with the Commission since its inception in 1972.

We, the majority of the Inland Wetland Commission support the U.S. Army Corps' report and indept study on the North Haven Mall. This report coincides with our preliminary study of approval and passing the Mall with conditions, by our Commission in 1973.

Our Quinnipiac River banks in their natural berm will not be disturbed, the buffer zone of 75 to 400 ft. will remain in its natural state, and approx. 16 acres will still be wetlands, Pond to be constructed will be 16.5 acres, replacing 3 small ponds. Wild life and growth will continue on this habitat.

I personally feel the Mall will be beneficial for the continuing growth and development for the Town of North Haven, due to the fact it will create jobs, tax revenues, be educational, and still have 30 acres plus of natural wetlands and greenery growth.

This parcel is not a total wetlands area, I have hiked, walked, examined soil,canoed the Quinnipiac River, and have found that some of the Wetlands were created in years gone by, by, excavation of soil for different reasons through the years.

Bishop St. Rte.22, has to be opened, - Mall or no Mall.
I live approximately 1,000 ft. from the corner of Bishop St., and due to the fact I use the Wilbur Cross Pkwy. quite frequently and find it hazardous getting on or off the ramp from Bishop St., Rte 22.
The road is narrow and creates a bottle neck and very dangerous.
This road has to be open in the very near future and not put off because of some person, who has no idea of the dangers involved - we need safty for walkers, bicyclist, and autodrivers. Widen the Road.

New Haven speaks of becoming a "Ghost Town" when the Mall is built, this "Ghost Town" I am sure will never be, they will always have shoppers from apts, colleges, residents, etc.... New Haven must get to the root of their problem and not use the Mall as a scape goat for a situation that exists, muggings, rapes, burgluries, stabbings & killings - people are fearful. A few constructive suggestions for what its worth:

1. Start in grammer schools for teaching & developing morals & integrity. Parents are to teach at home, social responsibility.
2. Outside activities, should have the same continuity - morals & integrity.
3/ Make children productive in schools & homes (this takes parents & teachers and church or synagogues

cont.

Mar. 16, 1982

To: The U.S. Army Corps of Engineers (cont.)

4. Teenagers loitering in the downtown Malls of N.H. should have places (one of the stores) set-up for them right there, where they can go to work at something productive, learn for free, such things has writing, cooking, sewing, home economic, for boys, writing, sciences, small machinery, tools, woodworking - along with the teaching of basic morals and social development and more respectful of other human beings. There should be no fee involved - some Senior Citzens will be happy to help.

   Some of the monies the Mayor has used for consultation could have gone for the above purposed.

   Their activities are not sports or dancing but something productive, so that these teenagers can be adults with with morals and integrity.

The summation of my report:

Each community has a right to do what is best for their Town with no interference from either side. I find it inappropriate for a Town to dictate to another town as to their development. New Haven can do their thing and North Haven can develop their Town and get on with building the Mall.

Respectfully,

Margaret Solecki

Margaret Solecki

P 39 576

March 22, 1982
10 Fairy Glen Drive
North Haven, CT 06473

Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

(Attn. Robert Adler, NEDPL-IP)

Dear Sirs,

My name is Dr. Lawrence R. Solomon. I am an Associate Professor of Medicine at the Yale University School of Medicine and a resident of North Haven, CT. I am greatly concerned about the potential impact of the proposed North Haven Mall on the southern Connecticut region in general and on the health of area residents in particular. In terms of the former, it should be emphasized that the North Haven Mall would be so-called only because of its physical location. It must be viewed as a regional shopping center and the economic and social well-being of the entire area must be assessed in determining its potential impact. Indeed, you have already heard much testimony on the devastating impact that this facility would have on the greater New Haven area. I share these concerns.

With regard to the impact of the proposed Mall on the health of local residents, I would like to direct your attention to the Air Quality analysis presented in the draft of the Environmental Impact Statement. Appropriately, this report directs major consideration to the impact of automobile emissions on air quality. However, the information presented is both incomplete and frankly misleading. Specifically, the effects on lead and hydrocarbon emissions are not analyzed at all while the effects on carbon monoxide exposure are understated.

With regard to lead, the report assumes that because of increased production of unleaded gasoline by major refineries, ambient lead levels in the air will continue to fall whether or not the Mall is built (Appendix I, pg 7). For this reason, it is stated, an analysis of lead was not performed. In fact however, the EPA is at this moment seriously considering relaxing the standards for lead levels in gasoline. The leaders of the Center for Disease Control in Atlanta have publically expressed their concerns about this proposed change. When it is remembered that low level lead exposure can cause permanent neurologic dysfunction and learning impairment in young children; that the automobile is the major source of air-borne lead; and that major residential areas will be affected by Mall-related traffic, it is clear that an analysis of lead exposure must be performed. Further, this analysis , at the very least, must use current regulatory standards for leaded gasoline and not the projected standard which may never be realized.

With regard to hydrocarbon emissions, the report states that their conversion to photochemical oxidants will occur slowly and at some distance from their site of release. For this reason, it is stated, analysis of hydrocarbon release was only performed on a mesoscale level and not on a microscale or immediate neighborhood level. In f however, photochemical oxidants represent only one aspect of hydrocarbon toxicity. It is

now clear that many of these chemical are readily absorbed by man and, in fact, concentrated in fatty tissues and breast milk. Potential toxicity of these chemicals include cancer, neurologic damage and infant illnesses, all of which may require many years to become clinically manifest. Because of this, an analysis of hydrocarbon exposure from automobile exhaust on a microscale basis should be presented.

Finally, i terms of carbon monoxide emissions, the figures presented again reflect the assumption that major improvements in air quality will result from the establishment of a variety of proposed emission standards. However, as you are doubtless aware, many of these standards, including the Clean Air Act, appear to be in significant jeopardy. The figures presented show a 50% fall in carbon monoxide exposure between 1980 and 1984 in most areas analyzed if the Mall were not to be built. The basis for this projection is not presented. Indeed, these figures seem entirely unrealistic when it is noted (as it is elsewhere in the draft EIS) that the Connecticut Motor Vehicle Implementation Plan predicts only a 25% decrease in carbon monoxide release and that will not be achieved until 1987. Nonetheless, the figures can be used to get some idea of the relative impact of the Mall in this regard. Comparing the projected figures for 1984 with or without the Mall, operation of the Mall will produce a doubling of carbon monoxide concentrations in almost all areas considered with predictions at four sites approaching the National Ambient Air Quality standard for carbon monoxide. (It should be noted that a fifth high exposure site is simply not addressed in the analysis.) Thus, if the known 1980 emission rates are used instead of the assumed emission rate, exposure in these areas would exceed this standard by almost 100%! In other words, at the very least construction of the Mall would completely negate the benefits to be derived from proposed regulatory standards, while, if these standards are not established, exposures will clearly exceed current permissable levels. The health impact of low level carbon monoxide exposure is significant and includes increased perinatal mortality, birth defects, neurologic defects, impaired mentation and increased cardiovascular demands. Clearly, this analysis requires careful, extensive revision.

In summary, the dat presented are incomplete and in no way justify the conclusion of the impact statement that construction of the Mall would have no significant impact on air quality. Indeed, the data suggest just the opposite - that significant carbon monoxide exposures will occur in 5 key residential areas. I hope that these issues will be more thoroughly addressed in a revised draft.

Thank you for your time in coming to our community and for your attention.

Sincerely yours,

Lawrence R. Solomon

Lawrence R. Solomon, M.D.
*Associate Professor of Medicine
Yale University School of Medicine

*Title for identification purposes only.

P40 FEIS respond 578

69 Buell St
North Haven
Connecticut 06473

Mr Robert Adler
U S Corps of Engineers
424 Trapelo Road
Waltham Mass 02254

Rec'd Feb 12, 82
RA
pg 2

Dear Mr Adler -

I have gone over the materials sent to you by the Mall project in North Haven, as well as your draft and the section 404 b.

Perhaps I have overlooked a very important aspect of the application for a permit. They give many charts and volumes of facts about what the mall will do for the town, including what the town can do with the properties in case the mall fails. However, they fail to present their own budget, and forecast, of what they plan to take out of the town in the way of profits to themselves. I feel this is one of the most important things the townspeople should have, and of paramount importance, for the purpose of a complete impact study.

Previously I have pointed out that if

these people are going to spend 150,000,000 to build the mall they must anticipate at least twenty percent (at todays interest rates) just to finance the capital. This would mean an outward flow from our town area of $30,000,000 yearly.

This is a lot of money, and above that, they must be planning a handsom profit for their management and efforts. Is it possible they are using the mall as a ploy to foster a huge building program in our town from which they expect to make millions for themselves?

I would like to ask that you require the mall builders, in connection with the import study, to submit a budget of their operations over the next five to ten years showing what they expect to withdraw from this project. Be as townspeople should not only know this but we should have access to any options they have taken within our town, and what their plans are for building high risers etc as was done behind the Hamden plaza. I frankly cannot see how a permit could be issued

until we have such information because, it seems to me, this is the most important item which should be included in an impact study.

In reviewing their studies to you I feel they have cleverly and intentionally withheld the information I am questioning.

If we cannot get this information I would want to inform the townspeople through the press and air the subject at the meeting you have called for March 16 1982. Perhaps you could let me know if such a budget has been submitted to you.

Yours most sincerely

Jon Sinigart

69 Buell St
North Haven
Conn 06472

P 41

March 8, 1982.

Department of the Army
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Sir:

Thank you for sending me a copy of the Draft Environmental Impact Statement, regarding the proposed North Haven Mall.

I would like to comment on a few areas of the application:

a. The area to be filled was excavated or "mined" for the sand and clay, thus the fill or a portion of, will replace material removed over a period of years.

b. Recreation - at the present time no recreation takes place in the area, except for some target shooting, since most of the land is privately owned.

c. Land use: The area is ideal for a shopping mall, or an industry-office type park.

d. Roads - major highway, I-91, Wilbur Cross Parkway (Rt. 15), Washington Avenue, (Rt. 5) just recently improved, and Rt. 22 are all good roads to service the area, and keep cars off neighborhood streets.

e. Navigation & water quality - at the present time the Quinnipiac River is used very little for navigation and quality, due to the number of towns above North Haven, that dump into the river, is slow to improve. Once the land is developed, however, both the recreational use (navigation) and quality should improve, due to public awareness.

MAR 1

f. Economics, needs & general welfare of the people. a project of this size will put many people to work, both in the construction, and associated industries. When completed, many people will find jobs in the stores and related businesses. Also this would broaden the town tax base and lighten the tax load of the towns people.

I cannot understand how a company willing to invest in a project, free of government monies, grants etc. can be deined or delayed over such a long period of time. This is counter-productive to the free-enterprize system.

Numerous friends support the proposed mall, Many of them shop at the West Farms Mall in Connecticut and the Westfield and Holyoke Malls in Massachusetts.

Thank you for the opportunity to give my comments on the application.

Very Truly Yours
Karl C. Veith

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30 Allendale Dr.
Northdaven, Conn. 06473.

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March 25, 1982

Mr. Robert Adler
U. S. Army Corps of Engineers
424 Trapelo Road
Waltham, Mass. 02154

RE: NORTH HAVEN MALL

Dear Mr. Adler:

I am writing to you in support of the "Stop-the-Mall" citizens' group, at the request of Ms. Letty McPhedran. A list of my professional qualifications appears at the end of this letter.

Those matters which I feel qualified to address, having read the "Draft Environmental Impact Statement" as well as the Gladstone Report (Appendix L), are as follows:

1. need for another center
2. incomplete economic report
3. Bishop Street widening

Need for Another Center

The bottom line on any argument about "need" for another shopping center is "can the new center attract enough business?" Where that business is to come from -- how many weaker centers must be erased to permit success for the new -- is not considered in location decisions by developers.

Those opposed to the Mall would ask the Army Corps of Engineers to consider recent court cases (Burlington, Vt.) when deciding to give approval to the North Haven Mall. Based upon the above argument, it is hoped that the Corps would reject the Mall proposal.

Incomplete Economic Report

In light of the following statement, excerpted from "1981 U. S. Industrial Outlook," a publication of the U. S. Department of Commerce Bureau of Industrial Economics, it might be appropriate to question the basic decisions of the developer.

> "The combination of recession, continuing inflation, and tight money during 1980 contributed to a rather bleak retail sales picture .... Credit controls imposed early in 1980

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> and higher interest rates were contributing factors in this ultimately unimpressive performance .... Some rebound in retail sales occurred when the controls were lifted; however, inflation and high interest rates continued to impinge on consumer purchasing power throughout 1980."

With the Government itself drawing a "bleak economic picture" nationally it might be appropriate to question the alternative growth assumptions of the Gladstone Report, and ultimately the justification for a new Regional Super Center.

Had Gladstone's report only shown one "possible future," at a 2.5% increasing rate, and not shown a higher growth option, that report would have been merely incomplete; that it included a high rate option and not a low or pure zero option indicates bias in favor of Mall Associates. It is hoped that the Army Corps of Engineers will see the merits of economic studies supplied by opponents to the North Haven Mall, provided with the full picture of economic and land use impacts.

Bishop Street widening

According to rough calculation, approximately 30% of the projected service area of the North Haven Mall lies west of the Wilbur Cross Parkway, requiring access along Bishop Street (Connecticut Route 22). Given the already-mentioned economics of the Mall, it is probable that this part of the service area is crucial to the ultimate success or failure of the shopping center.

However, for the Town of North Haven to plan for the impact of the increased traffic, it is necessary to know what improvements are to be made. This would include any reclassification of type as well as any provision for curb-cut controls or excess land purchase. A widened right-of-way to provide a buffer strip for the residential development that exists on Bishop Street (the older homes along that street are not, this writer believes, protected as an historic district) so that it may continue in the same land use, suffering minimal effect, might also be considered.

In other streets in other towns where developments have not been controlled by Army Corps of Engineers requirements, a mall could

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be inserted into a residential area with no effort to mitigate the effects on the life-style or fortunes of those who live close by. It is hoped that the Corps will act to protect the interests of the town of North Haven as well as the residents of Bishop Street.

As promised in the opening paragraph of this letter, below is a summary of some relevant experience in my 15.5 year career in Urban Planning, which would qualify the above comments as expert testimony.

I have presented a paper to the American Planning Association Conference, and have had an article entitled "Downtown Pedestrian Malls" published in Shopping Centers, U. S. A., published by the Center for Urban Policy Research, Rutgers University. My doctoral dissertation, written at the N.Y.U. Graduate School of Public Administration, was entitled "Downtown Pedestrian Malls: The Effects of Street-Closings in Central Business Districts on Land Use; An Investigation of the Physical Character of Streets which Become Malls."

Thank you for considering these arguments. I am available to document further any position taken in this letter.

Sincerely,

Margaret S. Wirtenberg

Dr. M. S. Wirtenberg

cc: Ms. Letty McPhedran