

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Manisha Juthani, MD
Commissioner



Ned Lamont
Governor
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Drinking Water Section

Drinking Water State Revolving Fund Environmental Assessment Justification for Categorical Exclusion

A. Project Identification

PWS Name: New London Dept of Public Utilities
Town: New London
PWSID: CT0950011
DWS Project No.: SFY 22-52
Project Name: System-wide Lead Service Lines - Replacement Construction – Phase 1A
Project Location: New London

B. Summary of Environmental Review

The environmental aspects of this project have been reviewed in accordance with State and Federal regulations. The findings of the environmental review are summarized below.

1. Project Description

The project referred as, Lead Service Line Replacement (LSLR) Program-Phase 1A, consists of the replacement of approximately 574 lead service lines and associated appurtenances in various locations within the New London Department of Public Utilities (NLDPU) distribution system. The existing water service lines (Utility and/or Customer sides) including galvanized requiring replacement and associated components that contain lead will be completely removed from service. New copper pipes (Type “K”) of various sizes, corporation stops, curb boxes, and isolation valves will be installed as replacement of the components that were removed as part of the LSLR program. The areas disturbed during the LSLR work will be restored to its original conditions.

This project will be funded through the Department of Public Health’s (DPH) Drinking Water State Revolving Fund (DWSRF).

2. Justification for Categorical Exclusion from Connecticut Environmental Policy Act Requirements



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The DPH has performed a review of the project under the Environmental Classification Document (ECD) for Connecticut state agencies and determined that this project is well defined and sufficiently limited in scope to qualify as a Category IV project consisting of the replacement of existing water service lines in various locations within the NLDPU distribution system. Based on this determination, a review pursuant to the Connecticut Environmental Policy Act (CEPA) is not warranted.

The public water system will be required to obtain any necessary state and local permits, as applicable. Copies of all required permits must be submitted to the DPH prior to any DWSRF funds being dispersed.

The project area is not within an identified flood plain.

It is not reasonable to expect any adverse impact to the natural diversity of the surrounding area as the project areas are not located within any current Natural Diversity Database Areas.

Although it is not expected that anything of archeological significance will be found, the DPH required the contract language to include procedures for notifying appropriate entities, should anything of significance be found during construction.

3. Justification for Categorical Exclusion from National Environmental Policy Act Requirements


Pursuant to 40 C.F.R. Part 6, Procedures for Implementing the Requirements of the National Environmental Policy Act (NEPA), the DPH has reviewed the proposed scope of work submitted by NLDPU in its application for DWSRF assistance. The result of this review indicates that there are no environmental concerns with this project, as discussed below:

- a. With respect to the criteria set forth in 40 CFR Part 6, the proposed project involves actions that are consistent with the eligibility for granting a Categorical Exclusion pursuant to 40 CFR Part 6.204 (a)(ii). Specifically, the project actions are related to replacement of existing water main and associated appurtenances.
- b. With respect to the criteria set forth in 40 CFR Part 6.204 (b) for not granting a Categorical Exclusion:
 - i. The proposed action is not known or expected to have potentially significant impacts on the quality of the human environment either individually or cumulatively over time;
 - ii. The proposed action is not known or expected to have any adverse human health or environmental effects on any community;
 - iii. The proposed action is not known or expected to significantly affect federally listed threatened or endangered species or their critical habitat;
 - iv. The proposed action is not known or expected to significantly affect any national natural landmarks;
 - v. The proposed action is not known or expected to significantly affect any natural resource areas (e.g. flood plains, wetlands, farmlands, or aquifer recharge zones);

- vi. The proposed action is not known or expected to cause significant adverse air quality effects;
- vii. The proposed action is not known or expected to have any effects on land use or growth patterns; and
- viii. The proposed action is not known or expected to cause significant public controversy.

C. Conclusion

Based on the DPH’s review, none of the NEPA criteria which would result in the denial of a Categorical Exclusion are met. The proposed action is not known or expected to have any adverse impact on the quality of the human environment. The action will provide a direct public health benefit to residents served by the NLDPU’s public water system by replacing lead service lines and other components that contain lead with lead-free materials to protect customers from lead contamination in drinking water. Furthermore, the Department has reviewed the action against the ECD for Connecticut state agencies and determined it is a Category IV action for which a review under the CEPA is not warranted. As a result, the proposed action has met the criteria to be categorically excluded from further NEPA or CEPA review.



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August 8, 2023

Date