



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

Instructions for Use:

The Environmental Review Checklist (ERC), as defined in Sec. 22a-1a-1(9) of the Regulations of Connecticut State Agencies (RCSA), is intended to assist state agencies in (1) determining whether a proposed action or category of actions requires public scoping, or (2) in recording an agency's initial assessment of the direct, indirect, and cumulative environmental effects of a proposed action at the completion of public scoping.

For the purposes of CEPA, an Action is defined in Sec 22a-1a-1(2) of the RCSA as an individual activity or a sequence of planned activities initiated or proposed to be undertaken by an agency or agencies, or funded in whole or in part by the state.

Completion of the ERC is only *required* as part of a sponsoring agency's post-scoping notice in which the agency has determined that it will not be preparing an EIE (Sec. 22a-1a-7(d) of the RCSA).

In all other instances, the sponsoring agency has the option to use this form or portions of it, in conjunction with the applicable Environmental Classification Document (ECD), as a tool to assist it in determining whether or not scoping is required and to document the agency's review. This can be especially useful for an agency administering a proposed action that is not specifically represented in the ECD or which may have additional factors and/or indirect or cumulative impacts requiring further consideration.

Even if an agency ultimately determines that public scoping is not necessary, as a matter of public record OPM highly recommends that the agency internally document its decision, and its justification.

In completing this form, include descriptions that are clear, concise, and understandable to the general public.

Note that prior to reviewing a proposed action under the Connecticut Environmental Policy Act (CEPA), Connecticut General Statutes (CGS), Section 16a-31 requires agencies to review any proposed actions for the acquisition, development or improvement of real properties, or the acquisition of public transportation equipment or facilities, and in excess of \$200,000, for consistency with the policies of the State Plan of Conservation and Development (State C&D Plan).



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PART I – Initial Review and Determination

Date: 1/13/2023
Name of Project/Action: Garfield Mills Remediation Project
Project Address(es): 90 and 100 Garfield Avenue
Affected Municipalities: New London

Sponsoring Agency(ies): Department of Economic and Community Development
Agency Project Number, if applicable: 2021-094-075-10000
Project Funding Source(s)/Program(s), if known: Municipal Brownfield Grant Program

Identify the Environmental Classification Document (ECD) being used in this review:

- Generic, or Agency-Specific
- An environmental assessment or environmental impact statement is being prepared pursuant to NEPA, and shall be circulated in accordance with CEPA requirements.
- The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment, or indicate the status of those reviews: Indicate status of SHPO and/or NATHPO review.

Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency's responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).

Completed by: Mark Burno, Project Manager

Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.

PART II – Detailed Project Information

Description of the Purpose & Need of the Proposed Action:

The proposed action will enable a brownfield to be remediated and cleaned up to support redevelopment and economic activity.

Description of the Proposed Action:

Municipal Brownfield Grant funding will be used to complete the remaining investigation, abatement and remediation of the properties located at 90 and 100 Garfield Avenue in New London, CT. The properties, totaling 3.59 acres were formerly occupied by the Edward Bloom Silk Mill. Following the remediation activities, the project developer, Garfield Mills, LLC, will redevelop the buildings into 87 units of workforce and affordable housing.

Alternatives Considered:

No action alternative

Public concerns or controversy associated with the proposed action:

None identified.

PART III – Site Characteristics (Check all that apply)

- The proposed action is non-site specific, or encompasses multiple sites;
- Current site ownership: N/A, State; Municipal, Private, Other: Please Explain.
- Anticipated ownership upon project completion: N/A, State; Municipal, Private, Other: Please Explain.

Locational Guide Map Criteria:

<http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cff556a>

Priority Funding Area factors:

- Designated as a Priority Funding Area, including Balanced, or Village PFA;
- Urban Area or Urban Cluster, as designated by the most recent US Census Data;
- Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
- Existing or planned sewer service from an adopted Wastewater Facility Plan;
- Existing or planned water service from an adopted Public Drinking Water Supply Plan;
- Existing local bus service provided 7 days a week.

Conservation Area factors:

- Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
- Existing or potential drinking water supply watershed(s);
- Aquifer Protection Area(s);
- Wetland Soils greater than 25 acres;
- Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
- Category 1, 2, or 3 Hurricane Inundation Zone(s);
- 100 year Flood Zone(s);
- Critical Habitat;
- Locally Important Conservation Area(s),
- Protected Land (list type): Enter text.
- Local, State, or National Historic District(s).

PART IV - Assessment of Environmental Significance – Direct, Indirect, And Cumulative Effects

| Required Factors for Consideration (Section 22a-1a-3 of the RCSA) | Agency’s Assessment and Explanation |
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| Effect on water quality, including surface water and groundwater; | <p>The proposed action will not result in any impact to groundwater and surface water quality. Groundwater in the area is classified as GB groundwater quality according to the CT DEEP Water Quality Classification Map New London, CT (dated October 2018) indicating that it is presumed to be impacted and not suitable for direct human consumption. Surface water along the Thames River east of the site is classified as SB quality (based on the above referenced map) where shellfish harvesting must be purified prior to human consumption. The proposed remediation and development should have a positive impact on soil, groundwater and surface water conditions.</p> <p>As indicated in the DEEP comments, the General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing.</p> <p>Projects that are exempt from local permitting (such as DOT) that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections.</p> |
| Effect on a public water supply system; | <p>Public water is available at the site and surrounding area. According to the CT DEEP Water Quality Classification Map (dated October 2018), groundwater in the area is not suitable for direct human consumption. As such, there is no adverse effect to public water supply. Furthermore, DEEP reviewed the location of this project and found that it is not in an aquifer protection area and has no comments on the proposed project.</p> |
| Effect on flooding, in-stream flows, erosion or sedimentation; | <p>The site is outside of any designated flood zones. Impacts associated with erosion and sedimentation will be at a minimum as the existing structure will remain.</p> |

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| <p>Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site;</p> | <p>The Garfield Mills project will repurpose the 100-year-old architecturally significant landmark structure historically known as the Edward Bloom Silk Building. The State Historic Preservation Office (SHPO) approved the Edward Bloom Silk Company Factory at 90-100 Garfield Ave. for listing in the National Register of Historic Places on Friday, September 18, 2020. The proposed asbestos, lead and PCB abatement activities were reviewed and approved by the SHPO in August 2022. Therefore, any potential impacts will be mitigated. The state/national historic tax credits application is still in progress.</p> |
| <p>Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;</p> | <p>According to the DEEP, "This project is not located in a Natural Diversity Database Area, which is a record of state or federal listed species maintained by the Wildlife Division." Therefore, there will be no potentially significant impacts.</p> |
| <p>Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;</p> | <p>Given the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated. Any residual impacted from fill and historic activities at the site will be address as part of the site investigation and cleanup.</p> |
| <p>Substantial aesthetic or visual effects;</p> | <p>The project is not expected to cause substantial aesthetic or visual impacts in the area.</p> |
| <p>Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;</p> | <p>Proposed project is consistent with the State C&D Plan Growth Management Principles 1 (Redevelop and Revitalize Regional Centers and Areas), 2 (Accommodate Housing Opportunities and Design Choices), 3 (Concentrate Development Around Transportation Nodes and Major Corridors), and 6 (Promote Integrated Planning Across All Levels of Government).</p> |
| <p>Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;</p> | <p>There may be temporary disruption during remediation and redevelopment of this property. However, the long-term affect will be positive to the site and neighborhood.</p> |
| <p>Displacement or addition of substantial numbers of people;</p> | <p>No direct, indirect, or cumulative impacts are anticipated.</p> |

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| Substantial increase in congestion (traffic, recreational, other); | Minor, temporary disruptions to traffic in the immediate area of the site may occur during remediation and redevelopment. Any potential impacts can be mitigated by adopting best management practices to reduce congestion during design, permitting and construction phases of project. Post-construction direct, indirect or cumulative impacts are not anticipated. |
| A substantial increase in the type or rate of energy use as a direct or indirect result of the action; | The applicant has indicated that solar and geothermal energy will be incorporated into the redevelopment. |
| The creation of a hazard to human health or safety; | Remediation and abatement will reduce risk associated with existing impact from the building materials, and polluted soil and groundwater at the site. |
| Effect on air quality; | <p>During remediation and redevelopment, there may be some dust created as well as exhaust fumes. No direct, indirect, or cumulative impacts to air quality are anticipated from the proposed redevelopment.</p> <p>DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.</p> <p>DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.</p> <p>Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-</p> |

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| | <p>minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA.</p> <p>Use of posted signs indicating the three-minute idling limit is recommended. DECD will be instructing the client to include language similar to the anti-idling regulations in the contract specifications for construction to allow them to enforce idling restrictions at the project site and reduce potential impacts related to idling vehicles.</p> <p>DECD will also be advising client to adopt best management practices including those from DEEP to reduce potential air quality impacts.</p> |
| Effect on ambient noise levels; | No significant adverse direct, indirect, or cumulative impacts to ambient noise levels from the redevelopment are anticipated. |
| Effect on existing land resources and landscapes, including coastal and inland wetlands; | Adverse effects to existing land resources and landscapes are not anticipated. |
| Effect on agricultural resources; | Direct, indirect, or cumulative adverse effects to agricultural resources are not anticipated. |
| Adequacy of existing or proposed utilities and infrastructure; | Existing utilities are present on site and in the area. |
| Effect on greenhouse gas emissions as a direct or indirect result of the action; | According to the applicant, solar and geothermal are planned for this redevelopment which will reduce the risk of greenhouse emissions. |
| Effect of a changing climate on the action, including any resiliency measures incorporated into the action; | No significant potential effects are anticipated. |
| Any other substantial effects on natural, cultural, recreational, or scenic resources. | Not anticipated |
| Cumulative effects. | The cumulative effects will be positive with the remediation, abatement and redevelopment of an existing historical structure. |

PART V - List of Required Permits, Approvals and/or Certifications Identified at the Time of this Review

DEEP has made recommendations in their review letter dated December 5, 2022 (attached). Permits may be required for Land and Water Resources, Stormwater General Permit, Solid Waste Disposal and Air Management.

PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DECD recommends that the project proceed as proposed and preparation of an Environmental Impact Evaluation (EIE) is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

No public comments provided during scoping notice period.