



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:	10/22/2024
Name of Project/Action:	Town of Vernon Exit 67 Sanitary Sewer Extension
Project Address(es):	Area in the vicinity of Exit 67 off of Interstate 84 in the Town of Vernon, CT
Affected Municipalities:	Town of Vernon
Sponsoring Agency(ies):	Department of Energy and Environmental Protection
Agency Project Number, if applicable:	<a href="#">2024-014</a>
Project Funding Source(s)/Program(s), if known:	Urban Act Grant

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: [Town of Vernon](#)-Water Pollution Control Authority & CTDEEP Municipal Wastewater Program

*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 Town of Vernon proposes to extend sanitary sewers to the area in and around exit 67 off of Interstate 84. This project was documented in a Town report from July 2017 and a subsequent feasibility study by Tighe & Bond from March 2021. These studies recommended the construction of sanitary sewers to the area around Exits 66 and 67 off of Interstate 84 in Vernon to provide sewer service to existing residential lots to allow the development of undeveloped properties in and around these exits in support of the industrial and commercial growth vision adopted by Vernon in its 2021 Plan of Conservation and Development and to address failing septic systems in certain areas.

The project is financially supported by a \$1,636,696 grant-in-aid (Urban Act grant) from the State of Connecticut assigned to the Connecticut Department of Energy and Environmental Protection (DEEP) for its administration. The total funding appropriated by the Town for this project is \$4,424,210 which includes the state grant.

**Description of the Proposed Action:** These findings provide a plan and design to construct new sanitary sewer lines and a pump station to serve several undeveloped parcels of industrial, commercial development, and residential.

The work consists of the installation of approximately 5,600 linear feet of 8" new gravity sewer main, approximately 1,200 linear feet of 6" new sewer service laterals, approximately 2,100 linear feet of 6" sewer force main, and 1 new pump station. The gravity sewer main, low pressure sewer main, and pump station would be maintained by Vernon's Water Pollution Control Authority. The new gravity sewer will connect to the new pumping station and the new sewer force main will connect to an existing 18-inch gravity sewer main. The pump station will have an average design flow rate of 123,400 gallons per day. All easements necessary for the construction of the station have been secured by the Town.

The scope of work includes the following major items:

- a. 5,420 linear feet of new sanitary sewer gravity main.
- b. New precast concrete manholes.
- c. Modifications to existing manholes.
- d. Individual sanitary sewer laterals within the road right of way.
- e. 2,100 linear feet of new sanitary sewer force main.
- f. New Sanitary sewer pumping station.
- g. Bituminous concrete pavement repair.

### Alternatives Considered:

No action alternative: Under this alternative sewer service would not be extended to the proposed area. Existing substandard septic systems would continue to be the only means of wastewater disposal for existing developed areas; and for existing business and commercially zoned areas within the project area, sewage disposal would continue to be a limiting factor for development or redevelopment.

Sewer extension alternative: Given the close proximity of existing sanitary sewer infrastructure, the extension of sanitary sewers for the project area was the recommended alternative for implementation. The existing wastewater conveyance and treatment systems have the capacity to accept the additional flow from the project area (i.e., 123,400 GPD). Development or redevelopment will be implemented consistent with the vision and goals adopted in the Town's 2021 POCD.

**Public concerns or controversy associated with the proposed action:**

The Town held a public hearing on April 8, 2024, for area residents to comment on the project. The comments received and addressed primarily concerned construction logistics and costs. In response, the Town of Vernon created [this website](#) that includes the construction schedule, cost information and provides direct contact information (phone and email) for residents to submit any additional questions.

On August 6, 2024 the Connecticut Department of Energy and Environmental Protection (CT DEEP) published a Notice of Scoping in the Environmental Monitor to solicit comments for the Sanitary Sewer Extensions on the surrounding areas near Exit 67 off of Interstate 84 in the Town of Vernon, CT. A public meeting was held via Zoom on August 19, 2024. After this hearing, the CT Office of Policy and Management submitted a comment which has been responded to in Section VII of this checklist. This was the only comment received during the notice of scoping process.

### 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:

[2018-2023 Locational Guide Map \(arcgis.com\)](http://2018-2023 Locational Guide Map (arcgis.com))

##### 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: None

- 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
Effect on water quality, including surface water and groundwater;	<p>Groundwater quality considerations:</p> <p>The onsite septic systems located in the project area are located on small lots and most have reached the end of their expected service life. The sanitary sewer will provide a more protective means of wastewater management and eliminate failing or non-compliant septic systems thus eliminating pathogen and nutrient pollution risk.</p> <p>Surface Water quality considerations:</p> <p>The installation of sewer lines and pump station will be done in previously disturbed areas. During construction, erosion control measures will be put in place to minimize sediment migration into nearby watercourses or into the stormwater system.</p> <p>Secondary impacts to areas slated for development or redevelopment will be reviewed and approved by the Vernon Planning &amp; Zoning and Conservation/Wetland Commissions when individual projects are proposed.</p>
Effect on a public water supply system;	<p>Properties that have private drinking wells will benefit from the elimination of septic systems as a result of this project by eliminating those pollution sources. Best management practices (BMP's) will be implemented for fueling of equipment and responding/eliminating spills during construction.</p>
Effect on flooding, in-stream flows, erosion or sedimentation;	<p>No negative effects are anticipated. BMP's will be implemented during construction for erosion control. The proposed sanitary sewers and pump station will not traverse or be constructed within streams or flood plain areas. The pump station will be located outside of the 100-year flood zone</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>There are no negative effects due to the project area contained within previously disturbed/existing roadways.</p>
Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of	<p>DEEP's Natural Diversity Database (NDDB) highlights the presence of the following State Endangered, Threatened, or Special Concern species particularly in area located south of I-84 (Reservoir Rd ) and Gages Brook area:</p>

<p>any resident or migratory fish or wildlife species;</p>	<ul style="list-style-type: none"> <li>• Eastern pearlshell (<i>Margaritifera margaritifera</i>)</li> <li>• Eastern box turtle (<i>Terrapene carolina carolina</i>)</li> </ul> <p>Best Management Practices (BMPs) to be employed during construction are proper erosion and sediment controls including, silt fencing, haybales, catch basin filters, install exclusionary fencing to prevent turtles from entering work areas, and ensure that no vegetation is removed from within 100 feet of any watercourses. A qualified environmental inspector should also be on-site within 24 hours of any storm event to ensure that sediment and erosion controls are functioning as intended. These measures will help protect the listed species and prevent pollution in the affected waterways. At the end of construction and once all areas are stabilized, all sediment and erosion control measures will be fully removed.</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>No negative effects are anticipated. Best management practices (BMP's) will be implemented for fueling of equipment and responding/eliminating spill potential during construction.</p>
<p>Substantial aesthetic or visual effects;</p>	<p>Substantial aesthetic or visual effects will be minimal. Although promoting economic development is one purpose of this project, these effects will be minimized by local planning and zoning, and inland wetland review prior to any development.</p>
<p>Inconsistency with: (A) the policies of the State C&amp;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>The Interchange 67 node encompasses the land around the I-84 Interchange 67 interchange. There are several large vacant properties surrounding the interchange along with a park-and-ride lot with bus service to Downtown Hartford and Mansfield. Extension of sewer service to this area could help facilitate future development. The Plan encourages a mix of higher density residential, commercial, or industrial development, comprehensively planned, at Vernon's primary greenfield development opportunity. Robust landscape buffers, quality site planning, and resource-sensitive sustainable design should be prioritized in an effort to strike a balance between economic development initiatives and environmental resource protection.</p> <p>The POCD prioritizes extending sewer service from Interchange 66 to Interchange 67 to support new development. This supports Growth Management Principle #1 to redevelop and revitalize regional centers and areas with existing or current planned physical infrastructure. Coordinating with the state of CT on investment and expanding the sewer system in this area, not only</p>

	<p>benefits the taxpayers use of their tax dollars but reduces the burden on developers interested in the parcels that offer growth in this area.</p> <p>This project is consistent with Growth Management #2 to expand housing opportunities. The Town of Vernon's POCD encourages a mix of higher density residential, commercial or industrial development. Extension of the sewer system service to this area can help facilitate future development. Creating a higher density and mixed income housing stock in an area that are near public transit, specifically this area is near a bus service to Downtown Hartford &amp; Mansfield, supports this growth management principle.</p> <p>The project is consistent with Growth Management Principle #6 to promote integrated planning across all levels of government to enhance economy overall in the state. The extension of the sewer system will make it easier for new development to connect to a system already put in place. Reducing the financial burden of these costs from the developer will help to initiate new development and projects in the area. This offers the option for economic development that will enhance the town and state while also addressing the goals presented in the POCD regarding conservation and development.</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;	No disruptions or divisions of our established community are anticipated. The Town is looking to extend the current sewer system to allow for future development/redevelopment as stated in the 2021 POCD. This will encourage retail, office, hotel and multifamily residences while continuing to protect natural resources.
Displacement or addition of substantial numbers of people;	None
Substantial increase in congestion (traffic, recreational, other);	Any proposed development in this area will be required to submit a full site plan of development along with a traffic study to determine the effects of development in the area. This will be required by the Traffic Authority Commission, and final approval will be held with Planning & Zoning. Any new development should contribute to the economic development and fiscal health of Vernon, while avoiding any negative impacts to the surrounding areas.

A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	The entire existing user base (i.e., ~8,500 users) of the sewer system will support the operational and maintenance costs of the new sewer system including pump station. The pump station will be equipped with state-of-the-art pumps equipped with variable frequency drives that will significantly improve the energy efficiency of the new station. The pumps will only operate when needed to draw down flows stored in wet well and thus optimizing electric use.
The creation of a hazard to human health or safety;	Project will improve human health and safety by eliminating substandard septic systems.
Effect on air quality;	<p>Minimal. Some effects on air quality during construction can be expected but BMP's will be in place to control dust emissions. Any remaining potential air quality impacts from fugitive dust will be addressed through construction best management practices which may include:</p> <ul style="list-style-type: none"> <li>• Covering or stabilizing stockpiled material as necessary.</li> <li>• Protected material staging and equipment storage entrances to prevent tracking onto town roads.</li> <li>• Limiting dust-producing construction activities during high wind conditions.</li> <li>• Use of chemical treatments (calcium chloride) to minimize dust as needed.</li> <li>• Any additional erosion/sediment control controls as required by applicable local and/or state permits</li> </ul> <p>Use of diesel generator only during infrequent utility power outages will reduce any potential effects on air quality.</p>
Effect on ambient noise levels;	None. Some localized effects on ambient noise levels will be expected during construction but BMP's will be in place to control these impacts including the use of properly functioning equipment and ensuring that work is performed during the work hours of 7:00 a.m., to 5:00 p.m. Construction work on weekends and holidays will need to receive prior approval from the Town and will be used only as warranted.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	None. Local planning and zoning and inland wetlands approved project after considering these impacts. Secondary impacts to areas slated for development or redevelopment will be reviewed and approved by the Vernon Planning & Zoning and Conservation/Wetland Commissions when individual projects are proposed.
Effect on agricultural resources;	None
Adequacy of existing or proposed utilities and infrastructure;	Expansion of sewers in this area is supported by the flow study conducted in the 2017 Facility Plan by Tighe & Bond which shows that there is capacity within the existing sewer lines and

	wastewater treatment plant to accept projected flows from this area.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Pump station is designed to be energy efficient and diesel generator is meant to be run only when there is an infrequent electrical utility outage.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Pump station is not located in a flood prone area so there is no effect for resiliency.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	None expected.
Cumulative effects.	This demand for wastewater treatment and conveyance will not be realized all at once but will likely take place over the course of many years. The proposed project is likely to promote additional development or redevelopment within the approved sewer service area. Individual proposals must be analyzed for specific traffic generation. Review and approval by the Vernon's Planning & Zoning Commission will be required for specific development or redevelopment proposals once these are generated

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

The selected subcontractor is responsible for obtaining the necessary encroachment permit from the Connecticut Department of Transportation. Additionally, the subcontractor must ensure that any waste disposal is conducted in compliance with all applicable laws and submit copies of permits to the project owner before using these areas.

The contractor is also required to minimize traffic obstructions and inconveniences to the public, ensuring access to businesses and residences during the project. Fire hydrants, sidewalks, stormwater systems, and other critical infrastructure must remain functional throughout the work. All work must adhere to established traffic control plans and maintain safety for both people and property.

1. Other Work at the Site
  - a. Water main replacement work by Connecticut Water Company is expected to take place in spring 2025 within the project area while the new sewers south of I-84 are under construction. Contractor will need to coordinate work with Water Company Contractor to avoid conflicts. Specifics to be discussed at preconstruction meeting.
2. Other Permits
  - a. Stormwater – Impacted area is approximately 2.15 acres so stormwater permitting is under the Town's jurisdiction.

## PART VI – Sponsoring Agency Comments and Recommendations

Based on this Environmental Review Checklist and the comment received from OPM, DEEP has concluded that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA, and the agency intends to proceed with this project.

- 1) Publication of this document to the Environmental Monitor shall satisfy the DEEP's responsibilities under Section 22a-1a-7 of the RCSA.
- 2) Vernon shall communicate recommended BMPs to contractor to ensure the protection of surface waters and any species of concern in the project area.

## PART VII - Public Comments and Sponsoring Agency Responses:

The following comment was received by OPM during the scoping notice:

“The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for the proposed Vernon Exit 67 Sanitary Sewer Extension and submits the following comments:

Vernon's Plan of Conservation and Development (POCD) identifies the Exit 67 Interchange as an area for development on several occasions. Throughout the POCD there are mentions of leveraging this land to better support the manufacturing sector and that the vacant land within this area provides the greatest opportunity for commercial and industrial expansion. The POCD further elaborated that the Interchange 67 Node is one that is designated for a mix of high density residential, commercial, and industrial development.

We understand that sewer expansion aids in cultivating more development in an area. OPM recommends that Vernon ensures that ratepayers are not further burdened by new sewer infrastructure and operating costs by encouraging a dense development pattern - whether industrial or mixed use - in the newly served area.”

Town of Vernon response:

“The POCD prioritizes extending sewer service from Interchange 66 to Interchange 67 to support new development. This supports Growth Management Principle #1 to redevelop and revitalize regional centers and areas with existing or current planned physical infrastructure. Coordinating with the state of CT on investment and expanding the sewer system in this area, not only benefits the taxpayers use of their tax dollars but reduces the burden on developers interested in the parcels that offer growth in this area.

This also supports Growth Management #2 to expand housing opportunities. The Town of Vernon's POCD encourages a mix of higher density residential, commercial, or industrial development. Extension of the sewer system service to this area can help facilities the future development. Creating a higher density and mixed income housing stocks in an area that are near public transit, specifically this area is near a bus service to Downtown Hartford & Mansfield, supports this growth management principle.

This also supports Growth Management Principle #6 to promote integrated planning across all levels of government to enhance economy overall in the state. The extension of the sewer system will make it easier for new development to connect to a system already put in place. Reducing the financial burden of these costs from the developer will help to initiate new development and projects in the area. This offers the option for economic development that will enhance the town and state while also addressing the goals presented in the POCD regarding conservation and development.

In regard to impact, this project will have a small amount of users that it will impact with minimal costs associated with it."

Also, as previously mentioned, the entire existing user base (i.e., ~8,500 users) of the sewer system will support the operational and maintenance costs of the new sewer system including pump station.