



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: March 16, 2024  
Name of Project/Action: Nathan Hale System Main Extension to Plains Road  
Project Addresses: South Street Extension, Coventry from approximately the intersection of Upton Drive to Plains Road  
Affected Municipality: Coventry  
Sponsoring Agency: Department of Public Health (DPH)  
Agency Project Number, if applicable: N/A  
Project Funding Source/Program, if known: Drinking Water State Revolving Fund (DWSRF)

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: Lisette Stone, Environmental Analyst, Source Assessment and Protection Unit, DPH DWS

*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 Coventry is seeking funding to extend water service connections from Connecticut Water Company's (CTWC) Nathan Hale System to five (5) single family residences, located on Plains Road in Coventry, which are experiencing polluted ground water. Testing completed between 2021 and 2022 identified the five properties; 143, 148, 150, 203 and 225 Plains Road, to be impacted with sodium and/or chloride above the Connecticut Department of Public Health (DPH) Drinking Water Action Level (DWAL). DPH's epidemiology studies have shown that elevated levels of sodium in a person's diet can contribute to higher blood pressure in individuals. Chloride in well water at concentrations greater than the DWAL of 250 mg/L can be corrosive to water pipes and other plumbing systems in homes and cause a saline taste in water, due to the due to increased conductivity of the groundwater.

The CTWC Nathan Hale System is supplied by two wells from which water is blended, treated and stored in an atmospheric tank and pressurized hydropneumatic tanks. Interconnection of these 5 residences will eliminate the need to rely on their wells that are known to have high levels of sodium and chloride.

### Description of the Proposed Action:

The extension of service from the Nathan Hale system to the five (5) residences on Plains Road, Coventry, will be accomplished by extending a 6-inch water main from the intersection of Upton Drive, Coventry. The total linear foot water main extension would be 5,015 feet to the impacted properties on Plains Road.

### Alternatives Considered:

Several engineering alternatives have been assessed to provide solutions to supply potable water to the affected residents. The alternatives include:

- No future action
- Build out the Miller Richardson Well into a local community supply system.
- Identification, and development of a new local community municipal water supply well in the vicinity of Plains Road.
- Drill new individual wells on each affected property.
- Purchase of the affected properties.
- Installation of whole-house reverse osmosis water treatment systems at the affected properties.

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

DPH received comments from the Connecticut Department of Energy and Environmental Protection (DEEP) on February 15, 2024 and from the Connecticut Office of Policy and Management (OPM) on

February 16, 2024. DPH did not find DEEP or OPMs comments, which are assessed in Part IV, to be of concern or controversy.

### 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**

<b>Required Factors for Consideration (Section 22a-1a-3 of the RCSA)</b>	<b>Agency’s Assessment and Explanation</b>
Effect on water quality, including surface water and groundwater;	<p>The five (5) properties proposed for interconnection with Connecticut Water Company’s (CTWC) Nathan Hale System currently utilize private wells as their drinking water source of supply, which have found to be impacted with sodium and/or chloride above the CTDPH Drinking Water Action Level. If these residences are allowed to connect, they may discontinue use of the contaminated wells and these water quality issues would be eliminated.</p> <p>Since 2019, the Department of Energy and Environmental Protection (DEEP) Remediation Division has been working with the Town of Coventry to investigate and develop corrective actions to address impacts from road salt that have resulted in contamination of the bedrock aquifer that serves as the source of drinking water to the Plains Road neighborhood. Because sodium and chloride are soluble and mobile in the environment, additional properties south along Plains Road may also become impacted in the future.</p>
Effect on a public water supply system;	<p>Water from the Nathan Hale system connection point at the end of Upton Drive will be pumped through a 6-inch, 5,101 foot water main extension to Plains Road connecting the five (5) impacted properties.</p> <p>CTWC will receive standard water consumption rate charges from the connected households. The Town will be responsible for any additional Operating and Maintenance (OM) requirements for the water main extension.</p>
Effect on flooding, in-stream flows, erosion or sedimentation;	<p>The project is not expected to cause negative impacts. The Town will implement appropriate erosion control measures as outlined in DEEP’s CT Guidelines for Soil Erosion &amp; Sediment Control.</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	<p>The project is not expected to cause negative impacts.</p>

setting; OR B. Disruption of an archeological or sacred site;	
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>The Natural Diversity Database (NDDDB) is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area.</p> <p>DEEP and DPH staff have reviewed NDDDB mapping and found that the project site is not within an NDDDB area.</p>
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	The project is not expected to cause adverse effects.
Substantial aesthetic or visual effects;	The project is not expected to cause adverse effects.
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>The project is consistent with the <a href="#">State of Connecticut’s Plan of Conservation and Development</a> (POCD) including Growth Management Principles (GMP):</p> <ul style="list-style-type: none"> <li>• 4.14: “Support the introduction or expansion of public water and/or sewer services or alternative on-site wastewater treatment systems only when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern” – <u>Id.</u> 16</li> <li>• 5.1: “Utilize a multiple barrier approach to ensure the availability of safe and adequate public water supplies that meet or exceed state and federal drinking water standards” – <u>Id.</u> 17</li> <li>• 6.3 “Support the creation of objective and uniform protocols for public water” – <u>Id.</u> 21</li> </ul> <p>The Office of Policy and Management (OPM) expressed concern of previous agency-funded extensions of water mains that might have induced development of agricultural and other conservation-oriented lands in a manner inconsistent with the POCD, and inquired as to if service restrictions would be incorporated into to minimize such potential inconsistencies.</p> <p>The understanding between the Town and DPH is that only the 5 currently impacted households will be eligible to tie into this water main extension, however if any additional, existing households along the spine of the proposed water main extension are found to be impacted, they will be eligible for tying into the water main. This would not result in additional development of previously</p>

	undisturbed areas, and therefore would remain consistent with the POCD.
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;	The project is not expected to disrupt communities or housing.
Displacement or addition of substantial numbers of people;	The project is not expected to displace any people.
Substantial increase in congestion (traffic, recreational, other);	The project is not expected to cause any increase in congestion.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	The project is not expected to significantly increase energy use.
The creation of a hazard to human health or safety;	<p>The project is not expected to create a hazard to human health and safety. To the contrary, upon completion the project will provide a safe and adequate water supply to the connected households on Plains road with current water quality concerns.</p> <p>OPM provided comments on the potential for disinfection by-product accumulation or loss of residual chlorine associated with the proposed main extension presenting a potential health risk to the 5 connected households. The Town and its consultant, GZA Environmental, are in coordination with CTWC regarding this matter and working on the Operations and Maintenance (OM) plan to ensure that the five homes receive water that meets the EPA and CTDPH drinking water standards.</p>
Effect on air quality;	The project is not expected to affect air quality.
Effect on ambient noise levels;	The project is not expected to affect ambient noise levels.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	<p>Two subregional watersheds merge at the proposed project area, and a large freshwater forest and shrub wetland lies between the proposed project area, and spans both north and south of South Street Extension.</p> <p>The project is not expected to cause negative impacts. In protection of these and surrounding areas, the Town will</p>

	implement appropriate erosion control measures as outlined in DEEPs latest CT Guidelines for Soil Erosion & Sediment Control.
Effect on agricultural resources;	The project is not expected to affect agricultural resources.
Adequacy of existing or proposed utilities and infrastructure;	The project will establish new public water system infrastructure to households along Plains Road in Coventry, CT.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	The project is not expected to create greenhouse gas emissions.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	The project is intended to increase resiliency by creating redundancy in water supply to those served by the water system.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	The project is not expected to cause negative impacts.
Cumulative effects.	The cumulative impacts of the project are not expected to be significant.

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

Possible Permits include: General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (DEEP-WPED-GP-015); the Town will work with their consultant, GZA Environmental, to secure all necessary local and state permits. Pursuant to [19-13-B102\(d\)](#), final plans and specifications will be submitted to DPH for approval.

### **PART VI – Sponsoring Agency Comments and Recommendations**

Based on DPH’s review of the documents provided, the project is not one that may significantly affect the environment, and therefore, an Environmental Impact Evaluation (EIE) is not required under CEPA.

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

Based on the DPH’s environmental assessment of the proposed project which includes a review of the comments provided by the Department of Energy and Environmental Protection (DEEP) dated February 15, 2024 and from the Connecticut Office of Policy and Management (OPM) on February 16, 2024, it has

been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA. The DPH will coordinate with the Town of Coventry to ensure that recommendations by DEEP and OPM are implemented.