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:	October 7, 2024
Name of Project/Action:	Connecticut Water Company Green Springs System Consolidation
Project Addresses:	The intersection of Ridge Road and Green Hill Road to the intersection of Durham Road (Route 79) and Green Springs Drive in Madison, CT
Affected Municipalities:	Madison
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:

☒ 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 Connecticut Water Company (CTWC) Green Springs System is a public water system serving approximately 26 single family homes. Major upgrades are required for the sources, pumping, treatment, and storage infrastructure based on a 2021 conditional assessment. In addition, perfluoroalkyl and polyfluoroalkyl substances (PFAS) has been detected in the Green Springs system at levels approaching the Environmental Protection Agency (EPA) proposed Maximum Contaminant Level (MCL) for perfluorooctane sulfonate (PFOS) and exceeding EPA's proposed MCL for Perfluorooctanoic acid (PFOA). PFOS and PFOA levels have been detected at 3.68 parts per trillion (ppt), and 4.88 ppt, respectively.

The proposed project will consolidate the CTWC Green Springs System with the larger CTWC Guilford Shoreline System. This will provide the former Green Springs system with the reliability and resiliency benefits of being tied into the larger Guilford system and eliminate the health concerns associated with the PFAS currently detected in the Green Springs System.

Description of the Proposed Action:

The proposed project will consolidate the CTWC Green Springs System with the CTWC Guilford Shoreline system by extending 6500 linear feet (LF) of water main and abandoning the wells and treatment system at Green Springs. In addition, a pump station will be installed along the route to address elevation differences.

Alternatives Considered:

No alternatives, other than inaction, were considered.

Public concerns or controversy associated with the proposed action:

DPH received comments from the Department of Energy and Environmental Protection (DEEP) on September 18, 2024 and responses from the Applicant on October 2, 2024. DPH did not find DEEPs comments or recommendations, nor the Applicant's responses, 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:
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:
☐ 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 Trust: Madison Land Trust
☐ 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;	The project is not expected to cause negative impacts. The project will cross the Hammonasset River and Neck River watersheds, which are both within the same regional watershed. While this will result in an inter-basin water transfer, the relatively small Green Springs System average daily demand (ADD) of 5,000 gallons per day (gpd) will not put a disproportionate strain on either watershed.
Effect on a public water supply system;	The project will have a positive effect on the public water supply system. The Green Springs System currently faces infrastructure challenges, including the presence of PFAS contamination and the need for upgrades to its pumping, treatment, and storage facilities. Consolidating Green Springs with the Guilford Shoreline system will enhance overall system reliability and resolve the immediate public health concerns associated with PFAS.
Effect on flooding, in-stream flows, erosion or sedimentation;	CTWC has confirmed through consultation with DEEP that a Flood Management Certification is not required. Therefore, no significant impacts related to flooding are anticipated. The extension of the water main and installation of a pump station will be designed and constructed with measures to minimize potential erosion or sedimentation during construction. As the project does not involve direct alterations to water bodies or natural stream flows, any effects on in-stream flows are expected to be negligible. Proper best management practices will be implemented to further prevent sediment runoff and erosion during construction.
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;	The project is not expected to cause negative impacts.
Effect on natural communities and upon critical plant and animal	The project is not expected to cause adverse effects. The Natural Diversity Database (NDDB) is a record of state or federal listed

species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;	species maintained by the DEEP Wildlife Division that may be found in the project area. While the project crosses a portion of an NDDB designated area, DEEP has determined that there are no anticipated impacts to state listed species from the project activities.
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;	The project is consistent with the State of Connecticut's Plan of Conservation and Development (POCD) including Growth Management Principles (GMP): • 4.14: " *Support the introduction or expansion of public water…when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern*" – Id. 16 • 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*" – Id. 17 • 6.3 "*Support the creation of objective and uniform protocols for public water*" – Id. 21
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;	The project is not expected to create a hazard to human health and safety. To the contrary, upon completion the project will provide safe and adequate water supply to consumers of the former Green Springs System.
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;	The proposed project is expected to have minimal impact on existing land resources and landscapes. Although the project may cross some watercourses, there will be no placement of fill within wetlands or watercourses, eliminating the need for additional permitting requirements. As such, no adverse effects on inland or coastal wetlands are anticipated. The construction activities, including the water main extension and pump station installation, will be designed to avoid disruption to sensitive land resources, preserving the integrity of the surrounding landscapes and watercourses.
Effect on agricultural resources;	The project is not expected to affect agricultural resources.
Adequacy of existing or proposed utilities and infrastructure;	The proposed project will improve the adequacy of existing utilities and infrastructure. The Green Springs System currently faces infrastructure inadequacies. Connecting to the Guilford system will enhance the adequacy of water infrastructure.
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 promotes climate resilience by enhancing the resilience of the water system that supplies consumers of Green Springs. The project will create infrastructure more capable of withstanding climate-related challenges, such as extreme weather events and fluctuating water demands.
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

At the time of this review, required permitting and approval will be conducted locally by the Town Inland Wetlands and Zoning Departments. The project does not involve fill in waterways, eliminating the need for both the federal Section 404 Clean Water Act and state 401 Water Quality Permit. Additionally, since the project will disturb less than one acre of land, registration for the General Permit for Stormwater and Dewatering Wastewaters is not necessary.

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 September 18, 2024 and the Connecticut Water Company (CTWC) responses dated October 3, 2024, DPH has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA. DPH will coordinate with CTWC to ensure that the recommendations by DEEP are implemented.