



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: 6/23/2026
Name of Project/Action: St. Edmunds Retreat-Septic System Repairs
Project Address(es): 1 Enders Island, Stonington, CT
Affected Municipalities: Stonington

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH24-0335-137 Enders Island Sanitary System Repair
Project Funding Source(s)/Program(s), if known: State fund

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: No adverse impact

☒ 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: Mithila Chakraborty, Ph.D., Environmental Analyst II

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:

St. Edmunds Retreat, 1 Enders Island – Septic System Repairs will include the repair and replacement of the sub-surface sewage disposal systems for one new mixed-use building and 5 existing mixed-use buildings with public water and private septic at the above stated property, in the Town of Stonington. The purpose of the proposal is to update the existing septic systems to include a modern, more efficient leaching system to reduce potential environmental contamination as a part of a multi-year program to update and improve the existing buildings and infrastructure on Enders Island. The existing systems are currently intact and functioning but were originally constructed from 1920 through the latest system in early 2000. The repair and replacement are to ensure continued long-term operation in a system that increases the ability to deal with environmental contaminants.

Description of the Proposed Action:

The existing systems are in an area which may be prone to storm surge in the future. The existing system in place consists of 5 separate leaching fields distributed throughout the island and serving the 7 existing buildings. These systems are typical 20th century systems with septic tanks and standard leaching chambers or trenches. This proposal will combine the outflow of all buildings through the existing septic tanks to provide solid waste separation. The effluent from each of these tanks will be directed to a central processing area. This central processing area will include an accumulation tank, and an in-ground filtration system. Effluent is treated in the filtration system removing and clarifying the effluent before it is introduced back into the ground via a new leaching field. The new leaching field will be in the existing parking lot, which is in a protected area on the island, away from sensitive areas. This area with the addition of the filtration system will provide leaching for the existing as well as future loads. The system will be built from the treatment system out to the existing buildings allowing the existing systems to remain operational until they are abandoned as they are tied into the new system building. This will allow the continuous operation of all aspects of the Retreat and avoid relocation of existing tenants during the construction period.

The benefits of this project include the elimination of older, limited function leaching systems installed in areas which may be prone to storm surge. The filtration system will reduce the environmental contaminants normally associated with leaching fields such as biological oxygen demand (BOD), nitrogen reduction, reduction in suspended solids, all of which effect the long-term performance of the leaching system, allowing a longer life span of the system, and a smaller overall leaching field. This protects the fragile ecosystem around the Island and the waters of Fishers Island Sound surrounding the island.

The plan for the project includes a study of the effluent with Pan Lysimeters to collect samples from the drain field to ascertain the efficiency of the septic system. The new septic system is using a layering system per the plans submitted to the local health district. Enders Retreat plans to recruit University of Connecticut students from the Avery Point campus in Groton to collect samples and report on the finding to determine the best conditions to facilitate maximum nitrogen reduction. On September 28, 2023, the Ledge Light Health District, the local health department authority, approved with conditions the 8/23/23 plans submitted as it complies with the requirements of Section 19-13-B103 of the Connecticut Public Health Code. This project is also part of a larger, long-term development of the property which will include improvement to treatment residences, improvements to the grounds, a new wall which will be built 8 feet from the existing sea wall. When all projects are completed, the site will have repaired and rehabilitated the existing aging infrastructure, made improvements to the long-term health and safety of the residents and users of the facilities, as well as improving environmental conditions on and around the island. Work that will occur in conjunction with or soon after the Septic System Improvements include the repurposing of the maintenance building into a residential treatment space, a new maintenance building which will be located adjacent to the septic system treatment area, a new protective stone wall to protect from storm surge which will not disturb the eel grass around the island.

There will NOT be an increase in the number of people in treatment, or any expansion in the existing residential census on site. The project site is in storm surge zone, near flood zone, estuarine and marine wetland, outside coastal barrier zone but within coastal boundary, within natural diversity database map identified endangered species etc.

Alternatives Considered:

No Action Alternative.

Public concerns or controversy associated with the proposed action:

NA

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
Effect on water quality, including surface water and groundwater;	The proposed action will not result in any impact on groundwater and surface water quality. Water Planning and Management Division, DEEP, commented: “In general, the Watershed Program of the Water Planning and Management Division is in support of projects that replace aging septic systems, as failing or malfunctioning septic systems are a major contributor to nonpoint source (NPS) pollution. The project description discusses reduction of environmental contaminants such as biochemical oxygen demand (BOD), nitrogen, and suspended solids; however, bacteria levels aren't listed. The Watershed Program would like to see bacteria levels considered, if they haven't already been. The estuary (Waterbody Segment ID: CT-E2_004) surrounding Enders Island is identified as an impaired waterbody for shellfish harvesting due to elevated bacteria levels, for which there is a pollutant reduction analysis for bacteria (total maximum daily load). The potential for the system being impacted by storm surge raises, rising water table, and being in a flood prone area raise additional concerns that this system may malfunction and contribute to any further pollution of the estuary. If there is any additional information on the technologies being used to reduce nitrogen (and/or bacteria), this may be of interest to the Watershed Program.” DOH encouraged the development team to follow DEEP's recommendations. The development team responded as: the letter is attached to the ERC as well. “I am writing to share the proactive environmental stewardship initiatives we have recently implemented on Enders Island to protect the sensitive aquatic ecosystem of Fishers Island Sound and the surrounding waters of Masons Island Harbor. Given our unique geographic vulnerability and immediate proximity to surrounding coastal watercourses, our primary focus has been minimizing our nitrogen footprint. To address wastewater effluent, we installed a Passive Nitrogen Reduction System—commonly known as a "layer cake" system. By utilizing an unsaturated sand layer above a saturated carbon-rich layer (incorporating sawdust), the system optimizes biological

	nitrification and denitrification to significantly strip nitrogen from the wastewater before it reaches the groundwater table. Alongside our advanced wastewater upgrades, we have overhauled our land management practices across our grounds: • Elimination of Synthetic Fertilizers: We have completely discontinued commercial lawn care chemical programs (such as TruGreen or ChemLawn). • Organic Soil Management: We transitioned exclusively to low-impact, organic-based soil nutrition. • Natural Nitrogen Fixation: We overseeded our primary lawn areas with white clover (<i>Trifolium repens</i>), which naturally captures atmospheric nitrogen to maintain vibrant green coverage without synthetic runoff. While we do not currently operate groundwater monitoring wells to quantify exact nitrogen reduction metrics, our operational goal is to lead by example in voluntary coastal nonpoint source pollution abatement. We are exceptionally proud to maintain our historic great lawn aesthetics while actively protecting the coastal water quality of Stonington.”
Effect on a public water supply system;	The project will not have any negative impact on the public water supply system. There are no concerns related to the Water Diversion Program from DEEP too.
Effect on flooding, in-stream flows, erosion or sedimentation;	No direct, indirect, or cumulative impacts.
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;	No direct, indirect, or cumulative impacts.
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;	No direct, indirect, or cumulative impacts. According to DEEP “A Natural Diversity Data Base (NDDDB) review was conducted in November 2023. The resulting determination found that no negative impacts to populations of Federal or State Endangered, Threatened or Special Concern Species are expected from the proposed project. Please note that comments from the NDDDB Program are limited to plant and wildlife species that are listed as endangered, threatened, or special concern, and do not include non-listed plant and wildlife species.” “No work is proposed in or near any waterbodies, therefore no impacts to fisheries resources are expected and no further consultation with the Fisheries Division is required.”

Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	According to DEEP “DEEP received an underground storage tank (UST) removal report for a 1,000-gallon heating fuel UST removed in 2022. One soil sample was collected from the UST grave for extractable total petroleum hydrocarbons (ETPH), which was below the Remediation Standard Regulations (RSRs). The PCB Program has no records for this address.”
Substantial aesthetic or visual effects;	The project is not expected to cause substantial aesthetic or visual impacts in the area.
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;	Proposed project is consistent with the State C&D Plan Growth Management principles #1 (Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure); Growth Management Principle #2 (Expand Housing Opportunities and Design Choices to Accommodate a variety of Household Types and Needs); and Growth Management Principle #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options).
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 direct, indirect, or cumulative impacts.
Displacement or addition of substantial numbers of people;	No direct, indirect, or cumulative impacts.
Substantial increase in congestion (traffic, recreational, other);	No direct, indirect, or cumulative impacts.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	No direct, indirect, or cumulative impacts.
The creation of a hazard to human health or safety;	No direct, indirect, or cumulative impacts.
Effect on air quality;	The proposed project is not a commercial or industrial facility. The proposed project is residential apartments. During construction there can be a little air dust issue, but no direct, indirect or cumulative impacts are anticipated. DOH advised clients to adopt best management practices to reduce potential air quality impacts.

Effect on ambient noise levels;	No direct, indirect, or cumulative impacts.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No direct, indirect, or cumulative impacts. According to DEEP “It appears that there are no inland wetlands on the site. If work is proposed to be conducted in a tidal wetland or at or below the Coastal Jurisdiction Line (2.0’ in Stonington) contact the LWRD for permitting requirements. Coastal Jurisdiction Line Fact Sheet. ”
Effect on agricultural resources;	Not any adverse impact on agricultural land is 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;	Not any adverse impact is anticipated.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Based on the scope of the project, no climate change impacts are anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Not any adverse impact is anticipated.
Cumulative effects.	Based on the scope of the project, the proposed project is not anticipated to result in any cumulative impact on the environment. The project will provide additional affordable housing.

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

NA

PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DOH 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:

DEEP comments are received and addressed in the ERC.

St. Edmund's Retreat
1 Enders Island
Stonington, CT 06378

August 12, 2026

Connecticut Department of Energy and Environmental Protection (DEEP)

79 Elm Street

Hartford, CT 06106

Subject: Sustainable Wastewater Management and Nitrogen Reduction Practices on Enders Island

To Marlene Krajewski, Wastewater Management and Water Planning Divisions,

I am writing to share the proactive environmental stewardship initiatives we have recently implemented on Enders Island to protect the sensitive aquatic ecosystem of Fishers Island Sound and the surrounding waters of Masons Island Harbor.

Given our unique geographic vulnerability and immediate proximity to surrounding coastal watercourses, our primary focus has been minimizing our nitrogen footprint. To address wastewater effluent, we installed a Passive Nitrogen Reduction System—commonly known as a "layer cake" system. By utilizing an unsaturated sand layer above a saturated carbon-rich layer (incorporating sawdust), the system optimizes biological nitrification and denitrification to significantly strip nitrogen from the wastewater before it reaches the groundwater table. Alongside our advanced wastewater upgrades, we have overhauled our land management practices across our grounds:

- **Elimination of Synthetic Fertilizers:** We have completely discontinued commercial lawn care chemical programs (such as TruGreen or ChemLawn).
- **Organic Soil Management:** We transitioned exclusively to low-impact, organic-based soil nutrition.
- **Natural Nitrogen Fixation:** We overseeded our primary lawn areas with white clover (*Trifolium repens*), which naturally captures atmospheric nitrogen to maintain vibrant green coverage without synthetic runoff.

While we do not currently operate groundwater monitoring wells to quantify exact nitrogen reduction metrics, our operational goal is to lead by example in voluntary coastal nonpoint source pollution abatement. We are exceptionally proud to maintain our historic great lawn aesthetics while actively protecting the coastal water quality of Stonington.

We welcome any feedback, technical guidance, or resources your department might offer for non-monitored, community-led coastal preservation systems. Thank you for your continued dedication to preserving Connecticut's coastal ecosystems.

Sincerely,

Kevin E. Miller

St. Edmund's Retreat, Inc.

Enders Island