



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: 09/2/2026
Name of Project/Action: Pierson School Adaptive Reuse
Project Address(es): 75 East Main Street, Clinton, Connecticut
Affected Municipalities: Clinton

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH25-0232-027
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: This project is under Historic Tax Credit Rehab program. Tax Credit Reservation Number: 94835. The Connecticut State Historic Preservation Office has reviewed the Part 3 application, "Request for Preliminary Certification and Reservation of Tax Credits" for the above-listed building and has determined that: The certification documentation is in accordance with the requirements of the Historic Rehabilitation Tax Credit Program (C.G.S. §10-416c); The total qualified rehabilitation expenditures meet the substantial rehabilitation test under C.G.S. §10-416c; A Reservation of Tax Credits has been approved for state fiscal year 2026 in the amount of \$2,560,950.60.

☒ 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:

The proposed development will include a total of 50 apartments: seven studios and 43 one-bedrooms units, one of which will be for a building superintendent. Of these units, 30 will be located in the existing building and 20 will be in a new addition.

Description of the Proposed Action:

All of the rental units will be reserved for seniors aged 62+. The proposed design also includes amenity space for the building's residents as well as leasing and management offices for the complex. The auditorium space will be renovated and ultimately leased back to the Town for reuse as a senior center. The renovation and new construction will be done in one phase. Construction is expected to take approximately 18 months. The design will comport with other historic neighboring structures, such as the Adam Stanton House (c.1791), the Holy Advent Church (c.1876) with its beautiful gardens, and the National Register Clinton Village Historic District. The addition will have sloped roofs, clapboard siding and colonial detailing to differentiate it from the brick Pierson School, taking its design cues from the surrounding historic district. Setting it back from East Main Street and the property line and capping it at three stories, lower than the existing building will help to minimize its visual impact. The site is located 0.3 miles from the Clinton Station for CTRail Shore Line East. There is continuous sidewalk access from the front of the school to the south entrance of Clinton Station. East- and west-bound bus stops are located in front of and across the street from the site (RVT Routes 641 and 645) providing access to shopping and the train station. The free Clinton Trolley Bus is also available with the closest stop at Liberty Green, 0.2 mile east of the school. The new development will have bicycle racks around the property.

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:

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;	Water Planning and Management Division, DEEP, commented: “The area in which the project is proposed is located within the CT Water Company’s service area, so public water supply will be available if needed. It is unlikely that the site will require more than 50,000 gallons of water per day, the jurisdictional threshold of the Water Diversion Program, so no new sources will need to be developed.” “The proposed construction site is not located in an Aquifer Protection Area or a parcel prioritized for source water protection as shown on the Parcel Prioritization for Source Water Protection Viewer, indicating that the property is not in a surface water or groundwater protection area. However, the site is located in an area of coarse-grained deposits with a thickness of 0-50 feet per the CT Surficial Aquifer Potential Map and has the potential for water supply development. To ensure protection of this potential groundwater source, it is recommended that the construction company implement Best Management Practices (BMPs) from the Connecticut's Aquifer Protection Area Program Municipal Manual entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas found in Section 14.4.8 of the Appendices of the Municipal Manual.” DOH encouraged the development team to follow DEEP’s recommendations. According to development team: “The site will not require more than 50,000 gallons per day.” “The contractor (Enterprise Builders) will implement Best Management Practices (BMPs) from the Connecticut’s Aquifer Protection Area Program Municipal Manual entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas.”
Effect on a public water supply system;	The project will not have any negative impact on the public water supply system.
Effect on flooding, in-stream flows, erosion or sedimentation;	No direct, indirect, or cumulative impacts as the location is not in any flood zone.
Disruption or alteration of an historic, archeological, cultural, or	This project is under Historic Tax Credit Rehab program. Tax Credit Reservation Number: 94835. The Connecticut State Historic

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;	Preservation Office has reviewed the Part 3 application, “Request for Preliminary Certification and Reservation of Tax Credits” for the above-listed building and has determined that: The certification documentation is in accordance with the requirements of the Historic Rehabilitation Tax Credit Program (C.G.S. §10-416c); The total qualified rehabilitation expenditures meet the substantial rehabilitation test under C.G.S. §10-416c; A Reservation of Tax Credits has been approved for state fiscal year 2026 in the amount of \$2,560,950.60.
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;	According to DEEP: “Fisheries Resources – No impacts to fisheries resources are expected and no further consultation with Fisheries is required.” “This project is not located in a mapped Natural Diversity Database Area. It is, however, in the vicinity of a number of listed species – NDDDB maps are updated every 6 months (June and December), so project proponents should recheck NDDDB maps after the next update and submit for review if appropriate. These comments address listed species only and do not reflect potential impacts to more common wildlife species.” DOH encouraged the development team to follow DEEP’s recommendations. The updated map was crosschecked and not in NDDDB area.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	A Phase I ESA was done June 2025. This assessment hasn’t revealed any REC. No Radon issue was identified in the AccuStar’s Radon assessment report of 2024. A Lead inspection report was done by EnviroMed at 2024. Lead Health and Safety in construction compliance plan and Lead management plan recommended for identified Lead issues. Lead risk test in water report by EnviroMed at 2024, it is recommended that water testing be performed following completion of renovation and prior to re-occupancy of the building as first draw of water found 3.3 ppb though second drawing didn’t identify any. The goal for drinking water is to eliminate presence of lead at any detectable level. Asbestos inspection for Building at 2024 by EnviroMed found Asbestos Containing Material (ACM) during the inspection of building. The inspection for Roof was also done by EnviroMed at 2024 and did not identify any ACM.

	The Enviromed Report for Other regulated material survey report at 2024 identified PCB, Mercury, Nickel issues.
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.

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;	Not any adverse impact is 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

Between one and five acres of disturbance and approved at the local level.

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.