



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).



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

PART I – Initial Review and Determination

Date: 09/2/2026
Name of Project/Action: 186 Shunpike Road
Project Address(es): 186 Shunpike Road, Cromwell, Connecticut
Affected Municipalities: Cromwell

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH25-0368-033
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: SHPOs Final determination on January 23, 2026 "no historic properties will be affected by the proposed development and no additional archaeological investigation is warranted"

☒ 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, 186 Shunpike, will include 60 apartments across 2 buildings (the “Development”) at 186 Shunpike Road in Cromwell, CT. The development plan also includes a clubhouse building with a common area, a leasing office, a resident services coordinator office, and an office for supportive services to be staffed by CCARC. The two residential buildings will each contain three stories and be served by an elevator. 186 Shunpike is currently an undeveloped piece of land. The entire parcel is 5.34 acres. There is a wetland area on the north side of the parcel that will remain undeveloped; total area of disturbance related to the development is 4.2 acres.

Description of the Proposed Action:

This site was submitted to SHPO for historical determination, and while there are no historical structures on site, SHPO has requested a professional archeological reconnaissance survey of the site. Marc Banks has been engaged to perform this survey, and recommended no further action. SHPO's Final determination on January 23, 2026 concurring with Dr. Banks's opinion that "no historic properties will be affected by the proposed development and no additional archaeological investigation is warranted.

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. There are no concerns related to the Aquifer Protection Area. Water Planning and Management Division, DEEP, commented: “The proposed project 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. The site is located in an area of glacial meltwater deposits as shown on the CT Surficial Aquifer Potential Map, but these fine-grained deposits have a low potential yield. This area is not a current source and is not likely a future source for groundwater. There are no concerns related to the Aquifer Protection Area Program.” “The proposed project is located within Cromwell Fire District’s service area, so public water supply will be available for the development site if needed. Otherwise, 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 project site is approximately 0.5 miles from a nearby impaired waterbody. The nearby waterbody, East Branch Willow Brook (segment CT4600-27_trib_01), is listed as impaired due to elevated bacteria. Nonpoint sources of pollution that can contribute bacteria to surface waters include stormwater runoff and pet waste (East Branch Willow Brook TMDL, 2012; Connecticut Statewide Bacteria Total Maximum Daily Load Core Document, 2024). The proposed project will create a significant amount of new impervious cover in the form of two apartment buildings, clubhouse building, and parking. Studies have shown a link between increasing impervious cover and degrading water quality conditions in a watershed (CWP, 2003). CT DEEP recommends incorporating the use of Green Infrastructure and/or Low Impact Development during construction in this project to minimize/reduce the impact of polluted stormwater from reaching the nearby wetlands and impaired waterbody. In addition, CT DEEP recommends environmentally friendly lawn care and landscaping practices, such as reducing or eliminating fertilizer and pesticide use, as well as encouraging residents to properly dispose

	of pet waste, as recommended in the Connecticut NPS Management Program Plan (2024).” According to development team: “The project will be connected to the Town of Cromwell’s public water and sanitary sewer systems, and coordination will be conducted with the Cromwell Fire District. The estimated water demand for the project is 10,000 gallons per day.” “To maintain water quality, minimize the potential for polluted stormwater runoff to impact nearby wetlands and the impaired waterbody, and protect downgradient resources, appropriate water quality measures or Best Management Practices (BMPs) have been incorporated into the design. The proposed stormwater management system focuses on providing water quality management while attenuating anticipated peak flows. The current design is a significant improvement over the previously approved project which did not include any measurable water management features. Water treatment in accordance with the Connecticut Department of Energy and Environmental Protection (CTDEEP) water quality flow (WQF) and water quality volume (WQV) treatment is provided at the proposed project site. The proposed stormwater treatment train consists of catch basins with 2-foot sumps, a hydrodynamic separator, and retention storage. Water quality volume for the site is provided within the proposed stormwater infiltration basin. A hydrodynamic separator will be installed in the proposed storm drainage system prior to discharging stormwater to the proposed stormwater infiltration basin. This unit will further remove suspended solids before discharging downgradient, which will in turn remove other pollutants that tend to attach to suspended solids and effectively remove other debris and floatables that may be present in stormwater runoff. The hydrodynamic separator has been designed to meet criteria recommended by the CTDEEP 2024 Connecticut Stormwater Quality Manual. The device was designed based on the determined WQF, which is the peak-flow rate associated with the WQV and sized based on the manufacturer’s specifications. The stormwater basin will provide retention volume along its bottom, thus creating a water quality feature within it. This serves several purposes, including stormwater renovation and first-flush retention. The vegetation within the basin will provide pollutant removal by filtering stormwater runoff and utilizing excess nutrients that may be present in the stormwater.
--	---

	Additional site measures to protect water quality include native plantings within the 100-foot upland review area adjacent to the wetland. These plantings will consist of the New England Erosion Control/Restoration Mix and the New England Wetland Seed Mix. Native focused tree and shrub plantings are included in the landscaping plan throughout the development.
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 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;	SHPO Requested an archaeological assessment before construction. Marc L. Banks, Ph.D., completed the survey (Jan 20, 2026). Survey recommended no further action. SHPOs Final determination letter dated January 23 found, "no historic properties will be affected by the proposed development and no additional archaeological investigation is warranted."
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: "A small, unnamed tributary runs by this property. Impervious surface coverage is high in the project area. As impervious surfaces (such as rooftops, roads, and sidewalks) increase within the watershed landscape from commercial, residential, and industrial development, the amount of stormwater runoff to surface waters also increases. These waters are negatively affected as increased pollutants from nutrients and bacteria from failing and insufficient septic systems, oil and grease from automobiles, and sediment from construction activities become entrained in this runoff. Watershed impervious coverage of just 10% and sometimes much less can have significant effects on aquatic ecosystems and their functions. In 2018, the Council on Environmental Quality reported that no stream surveyed in CT could fully support aquatic life when impervious cover was greater than 12%. Impervious coverage within tributary's catchment area is estimated by "Stream Stats" to be about 17%. A more than 100-foot vegetated buffer comprised of native species should be maintained around surface waters. To mitigate against increased impervious coverage, proper stormwater management BMPs, and incorporation of green infrastructure where feasible, considering features such as rooftop and rain gardens, vegetated swales or detention basins are strongly encouraged and would benefit the area.

	CT DEEP. 2018. 2018 CEQ Annual Report. https://portal.ct.gov/CEQ/AR-18-Gold/2018-CEQ-Annual-Report-eBook.” DOH encouraged the development team to follow DEEP’s recommendations. According to development team: “See the response above regarding stormwater management design, including water quality protection measures and alignment with the CTDEEP 2024 Stormwater Quality Manual. To mitigate potential impacts from stormwater runoff, the proposed stormwater management system will collect and convey runoff from all roof drains, foundation drains, and gutters through the storm drainage system and provide treatment through detention basins. The current design is a significant improvement over the previously approved project which did not include any measurable water management features. In addition, landscaping features have been incorporated throughout the project site, including native plantings within the 100-foot upland review area adjacent to the wetland. These plantings will consist of the New England Erosion Control/Restoration Mix and the New England Wetland Seed Mix.”
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 October 2025. This assessment has revealed the following AOC/REC in connection with the Site: Historical Agricultural Use – Shallow soil pesticide sampling conducted on the pretense that historical agricultural activity took place at the Site indicated that there is a presence of dieldrin in exceedance of the Residential Direct Exposure Criteria and the alternative GAPMC at several locations throughout the property. No HRECs, CRECs associated with the Site were identified. A Soil Management Plan was done December 2025. The following two types of soil have been encountered at the Site. • Pesticide Impacted Soil • Native Soil The following definitions apply to these soil types: Native Soils: Soils excavated with no visual or olfactory evidence of contamination, or with chemical test results at or below naturally occurring background levels. Native soil is anticipated to consist of a sandy silty soil. Sampling of native soil has not been completed. Impacted Soils and Materials: Soils and materials that may be polluted, contaminated, or hazardous as defined below: • Polluted Soils: Known or suspected soils that have pollutant concentrations at a level below the Residential Direct Exposure Criteria (ResDEC) and/or the GA Pollutant Mobility Criteria (PMC) but concentrations above laboratory detection limits or naturally occurring background levels. Polluted soil was encountered at the following locations: SS-03, SS-06, and SS-10. While concentrations meet cleanupstandards and do not need further remedial action,

	these concentrations should be considered during potential future soil management activities conducted on Site. • Contaminated Soils: Known or suspected soils that have contaminant concentrations at a level greater than the ResDEC and/or the GA PMC but that do not meet the hazardous waste criteria. Contaminated soil was encountered in the vicinity of the following surficial soil samples: SS-02, SS-04, SS-05, SS-07, SS-08, and SS-09. • Hazardous Soils: Soils known to contain contaminants at characteristically hazardous concentrations (no soils at the site are known to be in this classification).
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). OPM commented: “Projects of this nature should also be mindful of and responsive to broader local and regional planning efforts. Can you elaborate on how this project bolsters Cromwell’s Plan of Conservation and Development, Affordable Housing Plan, and other local or regional plans?” Development team responded: “The proposed multi-family development is responsive to broader local and regional planning objectives outlined in the Town of Cromwell Plan of Conservation and Development (POCD) and the RiverCOG Regional POCD. At the regional level, the proposed development is consistent with the RiverCOG Regional POCD, which identifies Cromwell as an area appropriate for a mixture of low- and high- intensity residential and commercial developments. The Cromwell POCD is aligned with these regional planning goals and includes an objective to encourage appropriate housing opportunities for residents at all stages of life and across a range of lifestyles, with an emphasis on housing diversity and affordability. This is particularly captured within the “Live Well” theme of the Cromwell POCD, which promotes a diverse housing stock that serves residents of varying ages, income levels, and backgrounds. Community input documented during the planning process indicated support for efforts to diversity housing options and improve housing affordability in the Town.”

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. The location is in Prime farmland but below 5 acres.
Adequacy of existing or proposed utilities and infrastructure;	Existing utilities are present on site and in the area. OPM commented: “A state-funded housing development should prioritize connections to public transit and local amenities. Are there plans to develop pedestrian and bicycle infrastructure, or improve access to public transportation to link this development with existing services and commercial assets in the area?” Development team responded: “The project is required to install off-site sidewalk infrastructure and intersection improvements that are expected to enhance pedestrian safety. The project site is not currently adjacent to a public bus route.”

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;	A comment submitted by OPM: “Incorporation of existing natural features, compact development patterns that minimize impervious cover, green infrastructure, and other nature-based solutions can reduce environmental impacts associated with converting undeveloped land. How has this project integrated sustainability and resiliency features?” The development team confirmed “The proposed project is a multi-family development consisting of one-bedroom and two bedroom units. The compact development pattern minimizes impervious surface area by accommodating a greater number of residents within the land footprint. To reduce further environmental impacts associated with the development of previously undeveloped land, including potential adverse effects from polluted stormwater runoff on nearby wetlands and downgradient resources, appropriate water quality measures and Best Management Practices have been incorporated into the proposed design. The proposed stormwater management system focuses on providing water quality management while attenuating anticipated peak flows. Water treatment in accordance with the Connecticut Department of Energy and Environmental Protection (CTDEEP) water quality flow (WQF) and water quality volume (WQV) treatment is provided at the proposed project site. The proposed stormwater treatment train consists of catch basins with 2-foot sumps, a hydrodynamic separator, and retention storage. Water quality volume for the site is provided within the proposed stormwater infiltration basin. A hydrodynamic separator will be installed in the proposed storm drainage system prior to discharging stormwater to the proposed stormwater infiltration basin. This unit will further remove suspended solids before discharging downgradient, which will in turn remove other pollutants that tend to attach to suspended solids and effectively remove other debris and floatables that may be present in stormwater runoff. The hydrodynamic separator has been designed to meet criteria recommended by the CTDEEP 2024 Connecticut Stormwater Quality Manual. The device was designed based on the determined WQF, which is the peak flow rate associated with the WQV and sized based on the manufacturer’s specifications. The stormwater basin will provide retention volume along its bottom, thus creating a water quality feature within it. This serves several purposes, including stormwater renovation and

	first-flush retention. The vegetation within the basin will provide pollutant removal by filtering stormwater runoff and utilizing excess nutrients that may be present in the stormwater. Additional green infrastructure elements incorporated into the proposed site design include native plantings within the 100-foot upland area as part of the stormwater management system. The plantings will include New England Wetland Seed Mix and New England Erosion Control/Restoration Mix. The site design also includes a native focus for trees and shrubs.”
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

The total area of disturbance is 4.2 acres, so an application is not required though the plan has been designed to be compliant with the CT DEEP Guidelines.

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 and OPM comments are received and addressed in the ERC.