



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: September 9, 2022
Name of Project/Action: State of Connecticut Department of Corrections Solar Projects
Project Address(es): 335 Bilton Road, 289 Shaker Road, 391 Shaker Road
Affected Municipalities: Enfield, Somers
Sponsoring Agency(ies): Department of Administrative Services (DAS)
Agency Project Number, if applicable:
Project Funding Source(s)/Program(s), if known: Funded through Connecticut Green Bank via a power purchase agreement

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: **The SHPO review resulted in the request for an archeological survey of the sites. The requested Archaeological Surveys were completed by Archaeological Consulting Services (ACS) in June 2022, and their report has been submitted to SHPO. SHPO issued a final letter dated June 27, 2022 (linked to the Environmental Monitor) concurring that no additional archaeological investigation is warranted and no historic properties will be affected by the proposed projects. . A review by NATHPO was not required for these projects.**

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: Michael Barrera, Senior Policy Advisor, Office of Commissioner, DAS

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 State of Connecticut has three state policy goals aimed to reduce greenhouse gas emissions and deploy new solar capacity annually for the next 10 years.

Description of the Proposed Action:

Deployment of roughly 3.76MW of solar power located at the Department of Correction facilities will help contribute to the state policy initiatives. Please see original Scoping Notice in Environmental Monitor (12/07/2021) for more details.

Alternatives Considered:

None

Public concerns or controversy associated with the proposed action:

No known concerns from the Public.

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:

Anticipated ownership upon project completion:

N/A, State; Municipal, Private,
 Other: Site will remain under state ownership, the solar array will be privately owned

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;	No
Effect on a public water supply system;	No
Effect on flooding, in-stream flows, erosion or sedimentation;	No. Measures to be implemented during and after construction to prevent erosion and sedimentation downstream.
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;	A review by SHPO resulted in the request for an archeological survey of the sites. The requested Archeological Surveys were completed by Archeological Consulting Services (ACS) in June 2022, and their report has been submitted to SHPO. SHPO issued a final letter dated June 27, 2022 concurring that no additional archaeological investigation is warranted, and no historic properties will be affected by the proposed projects.
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;	Minimal to none. A Habitat Assessment was completed by REMA Ecological Services in April 2022. The majority of the species identified by NDDDB as having the potential to exist at the site were not present. With regard to the other species that have the potential to exist, the report provided recommendations for mitigation measures to protect these species. These mitigation measures were incorporated into the site plans and construction sequence. Based on the Habitat Assessment and proposed mitigation measures, the Project is not anticipated to have an adverse effect on any listed species. The Habitat Assessment and Site Plans were submitted to NDDDB along with an application for a Safe Harbor Determination on April 26, 2022. Receipt of the final determination letter is still pending.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	No
Substantial aesthetic or visual effects;	Projects are located in remote areas with no sensitive visual receptors.

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;	No
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
Displacement or addition of substantial numbers of people;	No
Substantial increase in congestion (traffic, recreational, other);	No
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	No
The creation of a hazard to human health or safety;	No
Effect on air quality;	No
Effect on ambient noise levels;	No
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No direct wetland impacts to onsite wetlands. Measures to be implemented during and after construction to prevent any indirect impacts downstream.
Effect on agricultural resources;	No. Solar does not result in permanent impacts to farmland. Land can be reverted back in the future.
Adequacy of existing or proposed utilities and infrastructure;	No impact. Existing utilities available for use of project.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Direct impact on reducing greenhouse gas emissions.
Effect of a changing climate on the action, including any resiliency	No

measures incorporated into the action;	
Any other substantial effects on natural, cultural, recreational, or scenic resources.	No
Cumulative effects.	No

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

CEPA, CT Siting Council, DEEP stormwater permit, DAS construction permit

PART VI – Sponsoring Agency Comments and Recommendations

Based on public comments and review of the projects, DAS has identified no significant impacts requiring further assessment. DAS therefore determines that an Environmental Impact Evaluation is not necessary.

PART VII - Public Comments and Sponsoring Agency Responses:

The Connecticut Department of Energy and Environmental Protection (DEEP) submitted the attached comments.

Sponsoring Agency Responses

DEEP Renewable Energy – DEEP’s comments stated support for the project and no actions were required.

DEEP Stormwater During Construction – DEEP noted that the projects will be subject to the requirements of the General Permit for Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (General Permit). We are still waiting for the NDDDB determination letter before we can register under the General Permit. The SWPCP has been prepared, and we do intend to register as soon as we receive the required NDDDB Determination No.

DEEP Air Management - All contractors will use every effort to utilize the newest equipment and vehicles to reduce emissions. On-site idling will be limited.

DEEP Wildlife Division - A Habitat Assessment was completed by REMA Ecological Services in April 2022. The majority of the species identified by NDDDB as having the potential to exist at the site were not present. With regard to the other species that have the potential to exist, the report provided recommendations for mitigation measures to protect these species. These mitigation measures were incorporated into the site plans and construction sequence. Based on the Habitat Assessment and proposed mitigation measures, the Project is not anticipated to have an adverse effect on any listed

species. The Habitat Assessment and Site Plans were submitted to NDDB along with an application for a Safe Harbor Determination on April 26, 2022. Receipt of the final determination letter is still pending.

To: Michael Barrera, Department of Administrative Services
450 Columbus Blvd, Suite 1501, Hartford CT 06103

From: Linda Brunza- Environmental Analyst

Telephone: 860-424-3739

Date: 1/5/2022

Email: Linda.Brunza@ct.gov

Subject: Notice of Scoping for the State of Connecticut Department of Correction Solar Projects Enfield/ Somers.

Staff at the Department of Energy and Environmental Protection (DEEP) have reviewed the scoping notice for the proposed solar projects at the three locations in Enfield and Somers: 335 Bilton Road, 289 Shaker Road, and 391 Shaker Road.

Renewable Energy

The Department of Energy and Environmental Protection supports the State of Connecticut Department of Correction (DOC) Solar Projects at Enfield/Somers. This Project consists of five solar PV systems that will reside on the grounds of Willard-Cybulski Correctional Institute, Osborn Correctional Institution and Enfield Correctional institution. Collectively, these five projects will total 3.76 MW and will generate nearly 5,000 MWh of zero carbon energy for the Department of Corrections annually. This will help offset energy costs for the Department of Corrections by reducing operating costs and saving money for the state and taxpayers.

The approval and deployment of the DOC solar project will reflect continued progress in reducing emissions from the state's electric supply and is in direct support of three Connecticut state policy goals: (1) Governor Lamont's Executive Order 1 (EO 1) which requires executive agencies to reduce greenhouse gas emissions by 45% below 2001 levels; (2) the newly-released Executive Order No. 21-3, which directs the state to deploy an average of 10,000 kW of new solar capacity annually for the next 10 years, primarily sited on state buildings or property; and (3) the state's overarching greenhouse gas emission reduction goals to reduce the level of economy wide greenhouse gas (GHG) emissions 45 percent below 2001 levels by 2030, and 80 percent below 2001 levels by 2050.

Wildlife Division

Natural Diversity Database (NDDB) maps represent the approximate locations of species listed by the State, pursuant to section 26-306 of the Connecticut General Statutes (CGS), as endangered, threatened or of special concern. The maps are a pre-screening tool to identify potential impacts to state listed species. The database shows that the project falls within one of the NDDB areas.

The Osborn location at 335 Bilton Road, Somers, is not in a Natural Diversity Database Area and no application is required.

For Enfield, a preliminary assessment was issued on August 3, 2020 for these locations. The assessment included the need to survey with a survey list provided to the applicant. The review was administratively closed when the survey work was not started. A new review application to NDDDB will need to be submitted with a report that addresses the survey work and results or a finding of no suitable habitat. Please contact Robin Blum at Robin.Blum@ct.gov, with any questions.

The applicant is required to submit a *Request for Natural Diversity Data Base (NDDDB) State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to the NDDDB for further review. Additional information concerning NDDDB reviews, and the request form, may be found on-line at: [NDDDB Requests](#).

Stormwater During Construction

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, are subject to the requirements of the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015). For locally exempt projects disturbing one or more acres, a registration describing the site and the construction activity must be submitted to DEEP prior to the initiation of construction within timeframes specified in the general permit. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of eighty (80) percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit. For further information, contact the division at 860-424-3025. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

Please note that the [Stormwater General Permit for Construction](#) contains an appendix for solar development, Appendix I. This appendix should be utilized while designing the arrays to minimize grading, avoid wetland and buffer areas, and maximize vegetative growth.

DEEP staff noted there were no concerns in watershed management and that the sites are not in aquifer protection areas.

Air Management

DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted

with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period and may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Andrew Hoskins/ DEEP
Nicole Lugli/ DEEP

June 27, 2022

Timothy Coon, P.E.
J.R. Russo & Associates, LLC
P.O. Box 938
East Windsor, CT 06088
(sent via email only to tcoon@jrrusso.com)

Subject: Department of Corrections Solar Projects Archaeological Survey Report
900 Highland Avenue in Cheshire, Connecticut
42 Jarvis Street in Cheshire, Connecticut
289 & 391 Shaker Road in Enfield, Connecticut
335 Bilton Road in Somers, Connecticut

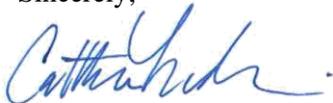
Dear Mr. Coon:

The State Historic Preservation Office (SHPO) has reviewed the interim report titled, *Phase I Archaeological Reconnaissance Survey Connecticut Department of Corrections Solar Projects* prepared by Archaeological Consulting Services (ACS). The project consists of four ground-mounted solar facilities at the referenced locations. The archaeological survey was completed at the request of this office in a letter dated February 7, 2022. The methods described in the interim report meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

As part of the requested investigation, ACS completed background research to develop an informed stratified-systematic survey plan. During the archaeological survey, shovel test pits were excavated at 50-foot intervals on a grid pattern. A total of 245 shovel tests were excavated in total at the four facilities: Highland Avenue (n=80), Jarvis Street (n=55), Shaker Road (n=36), and Bilton Road (n=74). Although shovel testing confirmed a largely intact stratigraphy with some areas of prior disturbance, no evidence of cultural features or significant archaeological deposits were recovered. SHPO concurs with ACS that no additional archaeological investigation of the project area is warranted and that no historic properties will be affected by the proposed undertaking. SHPO also supports the recommendation made by ACS to contact our office should project plans change to include impacts closer to Jarvis Street or archaeological Site 25-12 at the Cheshire sites, or closer to Shaker or Taylor Roads at the Enfield facility. This office requests two bound copies of the final report; one will be kept for use in the office and the other will be transferred to the Thomas J. Dodd Research Center at the University of Connecticut (Storrs) for permanent archiving and public accessibility.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. This letter supersedes all prior communications. For additional information, please contact me at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,



Catherine Labadia
Deputy State Historic Preservation Officer

cc: Walwer, ACS

February 7, 2022

Timothy Coon, P.E.
J.R. Russo & Associates, LLC
P.O. Box 938
East Windsor, CT 06088
(sent via email only to tcoon@jrrusso.com)

Subject: Department of Corrections Solar Projects
900 Highland Avenue in Cheshire, Connecticut
42 Jarvis Street in Cheshire, Connecticut
289 & 391 Shaker Road in Enfield, Connecticut
335 Bilton Road in Somers, Connecticut

Dear Mr. Coon:

The State Historic Preservation Office (SHPO) has reviewed the potential effects of the referenced projects on historic properties. SHPO understands that Connecticut Greenbank and the Connecticut Department of Corrections are working jointly to construct four ground-mounted solar facilities at the following locations:

- approximately 9.2 acres of undeveloped land located west of the Cheshire Correctional Institution at 900 Highland Avenue
- approximately 9.8 acres of total undeveloped land at two locations to the south and west of the Manson Youth Correctional Institution at 42 Jarvis Street
- approximately 6.5 acres of undeveloped land south of the Enfield Correctional Institution 289 & 391 Shaker Road
- approximately 8 acres of undeveloped land northwest of the Osborn Correctional Institution at 335 Bilton Road

As projects subject to review by the Connecticut Siting Council, they are subject to the provisions of the Connecticut Environmental Policy Act and a review by this office. In addition, the proposed projects will require a Stormwater Discharge permit issued by the Department of Energy and Environmental Protection through the authority of the Environmental Protection Agency; therefore, they are subject to review by this office pursuant to Section 106 of the National Historic Preservation Act.

The Enfield Shakers historic district, a property listed on the National Registers of Historic Places (NRHP) is situated adjacent to the proposed solar facility at the Enfield Correctional Institution, but there are no previously reported properties listed within or adjacent to the other three project locations. All of the proposed installations are located on gently sloping terrain with soils classified as sandy loams or loamy sands in proximity to sources of water. A review of readily available historic maps and aeriels suggests that there have been some prior disturbances, but their

extent is not considered extensive. Based on the environmental characteristics of the project sites, it is SHPO's opinion that each of the proposed solar facilities has the potential to contain significant archaeological resources. Therefore, SHPO is requesting that a professional archaeological assessment and reconnaissance survey be completed prior to construction. Areas that will not be developed do not need to be tested. All work should be done in compliance with our *Environmental Review Primer for Connecticut's Archaeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey. A list of qualified consultants is attached for your convenience.

SHPO appreciates the opportunity to comment upon this project and we look forward to continuing consultation. Do not hesitate to contact Catherine Labadia, Staff Archaeologist and Environmental Reviewer, for additional information at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,



Jonathan Kinney
State Historic Preservation Officer

cc: Pustilnik, APG