State of Connecticut

Environmental Review Checklist

Last Updated 09/12/2024

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 09/12/2024

PART I – Initial Review and Determination

Date:	11/14/2025
Name of Project/Action:	Enfield Station Remediation Project
Project Address(es):	33 North River Street, Enfield, CT
Affected Municipalities:	Enfield, CT
Sponsoring Agency(ies):	DECD
Agency Project Number, if applicable:	2025-049-075-10000
Project Funding Source(s)/Program(s), if known:	Municipal Brownfield Grant Program – C.G.S. Sec. 32-763

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: Per the SHPO Determination letter dated February 24, 2025, no historic properties will be affected. The letter is saved to the project SharePoint File.

☒ 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: James Parsley, Project Manager

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 project will remediate and clean-up a brownfield, and will prepare the site for the construction of an approximately 160-unit multifamily residential complex and a transit-oriented development.

Description of the Proposed Action:

The $4,000,000 grant funds awarded in Round 20 of the Office of Brownfield Remediation and Development Municipal Grant Program will be used by the Town of Enfield for remediation activities on the 3.24-acre site, former home of the Bigelow Carpet Manufacturing Plant, at 33 North River Street in Enfield. The cleanup work will enable the construction of an approximately 160-unit multifamily residential complex and transit-oriented development.

Alternatives Considered:

No action alternative.

Public concerns or controversy associated with the proposed action:

No concerns or controversy identified.

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:
ADOPTED 2025-2030 Locational Guide Map

Priority Funding Area factors:

☐ Designated as a Priority Funding Area, including ☐ Balanced, or ☐ Village PFA;
Not Applicable – This project is located in a "Suburban" Activity Zone as defined by the 2025-2030 Connecticut C&D Plan.
☐ 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;	According to DEEP comments, the site is located directly adjacent to the Connecticut River (CT4000-00_03), which is an impaired waterbody and has a Connecticut Statewide Bacteria Total Maximum Daily Load for E. coli. Due to existing contamination at the site and to minimize the water quality impacts to nearby surface waters (Connecticut River) during both remediation and future redevelopment, proper management measures for stormwater and sediment should be taken. DEEP recommends incorporating the use of Green Infrastructure and/or Low Impact Development in this project, retaining a riparian buffer, and encourages sustainable snow/ice removal practices in the winter (i.e. Green SnowPro) to minimize/reduce the impact of polluted stormwater from reaching receiving surface waters, to reduce further impairment to the Connecticut River, and to maintain the streambank.
Effect on a public water supply system;	The 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 a likely future source for groundwater. There are no concerns related to the Aquifer Protection Area Program. The site is located within the Connecticut Water Company's Northern Region - Western System, so public water supply will be available for the proposed development sites if needed. If the site requires more than 50,000 gallons per day to be withdrawn from ground or surface waters on-site, DEEP's Consumptive Water Diversion Program should be consulted.
Effect on flooding, in-stream flows, erosion or sedimentation;	Portions of the site are located in the 100-year floodplain. The proposed location of the building following remediation is located above the 100-year base flood elevation. A Flood Management Certification will be obtained from CT DEEP prior to the initiation of any work onsite.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A.	The site is not historic and SHPO determined that the project has no adverse effect on historic, archeological, or cultural resources. The SHPO determination letter with this finding is dated 2/24/2025. The letter is saved to the project SharePoint file.

Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site;	
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;	The site is in a Natural Diversity Data base (NDDB) area. The fund recipient will purse an NDDB review to demonstrate compliance for any permit applications or use of State funding. DEEP Fisheries Division staff have concerns about developing riparian habitat and converting a forested buffer into impervious surfaces and lawn. To mitigate potential impacts of the project, DEEP staff recommend: • In the post-scoping notice or Environmental Impact Evaluation, the developer can explain why a seawall is needed or if it can be removed and a robust vegetative buffer can be established in its place for the length of the property. • A minimum of a 100-foot-wide woody riparian buffer is recommended to be established along the Connecticut River that extends the length of the property. • Incorporating green infrastructure, rain or rooftop gardens, and a stormwater management plan to mitigate the potential impacts from the increase in impervious surfaces. • Planting a colorful patchwork of native, low-growing, ground cover plants (as an alternative to the lawn area) that will attract pollinators, bear foot traffic, and require little to no maintenance (i.e. mowing, fertilization) accompanied by an educational kiosk on the benefits of such lawn alternatives. If these mitigation measures are not feasible to the greatest extent possible, DEEP recommends including alternative designs that were considered as well as the justification to remove all vegetation/trees from this site without replanting, in either the post-scoping notice or potential Environmental Impact Evaluation.
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 comments, the Bigelow Mill site across the street at 55 Main Street has documented soil detections of VOCs, SVOCs, metals, and pesticides. In addition, PFAS and 1,4 Dioxin will need to be included in any soil analysis conducted on site due to the site's historical carpeting operation.
Substantial aesthetic or visual effects;	The project is not expected to cause substantial aesthetic or visual impacts to the area. Impacts will be managed through the local planning and zoning process.

Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;	The proposed action is consistent with the State 2025-2030 C&D Plan Guiding Principles and Visions.
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	The site has been vacant since 1976. Disruptions of existing communities and municipal/regional plans are not anticipated.
Displacement or addition of substantial numbers of people;	Site is vacant. No direct, indirect, or cumulative impacts are anticipated.
Substantial increase in congestion (traffic, recreational, other);	Any potential impacts will be managed through local planning and zoning approval processes to adopt best management practices to reduce congestion during design, permitting, construction and operational phase of the project.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	There will potentially be an increase in energy use during construction and after completion of the development since the site is currently vacant. Impacts will be mitigated during permitting and design of project.
The creation of a hazard to human health or safety;	No creation of hazards. The proposed action, remediation of the site, will reduce risk associated with existing impacts that have been identified at the site as the result of historical site operations.
Effect on air quality;	Any potential impact will be addressed by adopting best management practices to reduce potential air quality impacts.
Effect on ambient noise levels;	There will potentially be an increase in ambient noise during construction and after completion of the development since the site is currently vacant. Impacts will be mitigated during permitting and design of project. The effects on ambient noise will be evaluated through the local planning & zoning process.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	DEEP staff recommend in their comments addressing concerns with the proposed increase in impervious cover, and mitigation considerations, in the post-scoping notice. The increase in impervious cover will be evaluated and managed through the Flood Management Certification.
Effect on agricultural resources;	No direct, indirect, or cumulative adverse effects to agricultural resources are anticipated.

Adequacy of existing or proposed utilities and infrastructure;	The installation/improvement to site utilities are anticipated. All site utilities will be approved by the municipality, local or state level agencies and best practices will be incorporated during site construction and site redevelopment.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Potential impacts will be mitigated by adopting best management practices during design and construction.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	The proposed project is site remediation and clean-up. Potential resiliency measures will be addressed during the design and construction.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	According to DEEP comments, based on provided schematic plans provided, this redevelopment will add a large amount of impervious surface in both the form of the buildings and parking spaces in close proximity to the Connecticut River. The redevelopment also appears to include removing a large amount of riparian vegetation, which currently protects the streambank and absorbs some pollutants from surface runoff. The increase in impervious cover will be evaluated and managed through the Flood Management Certification and reviewed by DEEP LWRD.
Cumulative effects.	The project is expected to improve site conditions and the area.

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

Natural Diversity Database Review

Flood management Certification

PART VI – Sponsoring Agency Comments and Recommendations

After examining any potential environmental impacts and reviewing all comments received, DECD has concluded that the preparation of an Environmental Impact Evaluation (EIE) is not warranted. ***Note: Please see attached responses to comments from DEEP.***

PART VII - Public Comments and Sponsoring Agency Responses:

The CT Dept. of Energy and Environmental Protection (CT DEEP) have provided comments (see attached - comments). No other public comments were provided during scoping notice.

State Historic Preservation Office
Department of Economic and Community Development

CONNECTICUT

February 24, 2025

Office of Brownfield Remediation and Development
DECD
450 Columbus Boulevard, Hartford, CT 06103
(sent only via email to brownfields@ct.gov)
(sent only via other email to Jennifer.Schneider@ct.gov)

Subject: Enfield Station-North River Street_Enfield_20RG
33 N River St, Enfield, CT, 06082, USA

Dear Jennfier,

The State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of the Connecticut Environmental Policy Act.

It is our opinion that the subject property does not appear to be eligible for listing on the State or National Register of Historic Places. Based on the information provided to this office, no historic properties will be affected.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Todd Levine, Environmental Reviewer, at (860) 500-2337 or todd.levine@ct.gov.

Sincerely,

Jonathan Kinney
State Historic Preservation Officer

To: Almariet Roberts, Department of Economic and Community Development
From: Jordan DiDomenico
Telephone: 860-424-3708
Email: Jordan.DiDomenico@ct.gov

Date: 5/23/2025

Subject: Scoping for Enfield Station Remediation Project

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the Enfield Station Remediation Project. The $4,000,000 grant funds awarded in Round 20 of the Office of Brownfield Remediation and Development Municipal Grant Program will be used by the Town of Enfield for remediation activities on the 3.24-acre site, former home of the Bigelow Carpet Manufacturing Plant, at 33 North River Street in Enfield. The cleanup work will enable the construction of an approximately 160-unit multifamily residential complex and transit-oriented development.

An early municipal assistance meeting was held between DEEP and Town of Enfield on September 18, 2024. During the meeting DEEP provided permitting information for the project as well as follow-up contacts.

The following comments are submitted in response to the scoping requirements of the Connecticut Environmental Policy Act. Scoping is the gathering and analysis of information that a state agency will use to establish the scope of environmental review of a proposed project. Scoping is done in the early planning stages of a project and DEEP is a commenting agency. Contact information is included as well as any necessary links to DEEP's webpages.

1. Effect on water quality, including surface water and groundwater.

Marlene Krajewski, Water Planning and Management Division,
Marlene.Krajewski@ct.gov

The site is located directly adjacent to the Connecticut River (CT4000-00_03), which is an impaired waterbody and has a Connecticut Statewide Bacteria Total Maximum Daily Load for *E. coli*. Due to existing contamination at the site and to minimize the water quality impacts to nearby surface waters (Connecticut River) during both remediation and future redevelopment, proper management measures for stormwater and sediment should be taken.

Based on provided schematic plans provided, this redevelopment will add a large amount of impervious surface in both the form of the buildings and parking spaces in close proximity to the Connecticut River. The redevelopment also appears to include removing a large amount of riparian vegetation, which currently protects the streambank and absorbs some pollutants from surface runoff. As such, DEEP recommends incorporating the use of Green Infrastructure and/or Low Impact Development in this project, retaining a riparian buffer, and encourages sustainable snow/ice removal practices in the winter (i.e. Green SnowPro) to minimize/reduce the impact of polluted stormwater from reaching receiving surface waters, to reduce further impairment to the Connecticut River, and to maintain the streambank.

Melissa Fahnestock, Water Planning and Management Division, Melissa.Fahnestock@ct.gov

The 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 a likely future source for groundwater. There are no concerns related to the Aquifer Protection Area Program.

Melissa Mostowy, Water Planning and Management Division, Melissa.Mostowy@ct.gov

The site is located within the Connecticut Water Company's Northern Region - Western System, so public water supply will be available for the proposed development sites if needed. If the site requires more than 50,000 gallons per day to be withdrawn from ground or surface waters on-site, DEEP's Consumptive Water Diversion Program should be consulted.

Ryan Mowrey, Remediation Division, Ryan.Mowrey@ct.gov

The groundwater under the historical mill area has the potential to be contaminated. The Bigelow Mill site that was remediated across the street at 55 Main Street historically had petroleum compounds, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, and metals detected in groundwater. If groundwater is encountered on site during construction activities proper characterization should be done to make sure that the groundwater is not contaminated. In addition to the chemicals listed above, per- and polyfluoroalkyl substances (PFAS) and 1,4 Dioxin should be included in any analysis of the soil and groundwater. Due to Bigelow Mill's association with carpeting, these chemicals have the potential to be present.

2. Effect on flooding, in-stream flows, erosion, or sedimentation.

Darcy Winther, Land and Water Resources Division, Darcy.winther@ct.gov

Flood Management Certification: If proposed activities are being funded or conducted by a state agency AND are being conducted within a FEMA designated floodplain, the applicant should consult with the DEEP's Land and Water Resources Division for information on how to comply with the States Flood Management Statutes and Regulations. For information on identifying if the site is in a flood zone, please see FEMA's website: FEMA Flood Map Service Center. For information on Flood Management Certification, please see DEEP's website: Flood Management Certification Fact Sheet.

3. 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.

Robin Blum, NDDB Program, Wildlife Division, Robin.Blum@ct.gov

This site appears to be in a Natural Diversity Data base (NDDB) area. An NDDB review will need to be performed in order to demonstrate compliance for any permit applications or use of state funding.

Shalyn Zappulla, Fisheries Division, Shalyn.Zappulla@ct.gov

DEEP Fisheries Division staff have concerns about developing riparian habitat and converting a forested buffer into impervious surfaces and lawn.

The portion of the Connecticut River in the site's vicinity is home to a diverse fish species assemblage and one of the largest diadromous runs in the east coast US. These migratory fish include Federally endangered Atlantic and Shortnose sturgeon, state-listed Blueback Herring, Alewife, American Eel, American Shad, and Sea Lamprey. Additional resident species include Banded Killifish, Black Crappie, Bluegill, Bowfin, Channel Catfish, Common Carp, Fallfish, Green Sunfish, Largemouth Bass, Pumpkinseed, Redbreast Sunfish, Rock Bass, Smallmouth Bass, Spottail Shiner, Walleye, White Catfish, White Sucker, and Yellow Perch.

Rivers attract development, industry, and agriculture. Chipping away at remaining riparian buffers harms the aquatic (and terrestrial) ecosystem. Land disturbance has a direct effect on water quality and aquatic resources, and vegetated buffers are crucial to protect both. Vegetated buffers filter out nutrients and pollutants, stabilize banks, provide food, provide and create habitat, cool temperatures through evapotranspiration and shading, mitigate flooding, and control sedimentation. Vegetated buffers provide these services at no cost, where the cost to correct these issues can be extensive. To put in economic terms, the following study shows the

dollar value in what an ecosystem can provide: "Economic values for ecosystem services: A global synthesis and way forward," by Brander, L.M. *et al.*, 2024.

The recommended size of a buffer varies with its purpose. For example, recommendations can range from 100 feet to control sedimentation, nutrients, and pollutants, to 30-200 feet to stabilize banks and control floods, 50-400 feet to provide fish habitat and sustain aquatic insect populations, and 30-100 feet to cool water temperatures (DeMeo *et al.*, 2005). This is not an exhaustive list, but buffers recommended to maintain healthy fish populations are often at least 50-300 feet in width.

To mitigate potential impacts of the project, DEEP staff recommend:

- In the post-scoping notice or Environmental Impact Evaluation, the developer can explain why a seawall is needed or if it can be removed and a robust vegetative buffer can be established in its place for the length of the property.
- A minimum of a 100-foot-wide woody riparian buffer is recommended to be established along the Connecticut River that extends the length of the property.
- Incorporating green infrastructure, rain or rooftop gardens, and a stormwater management plan to mitigate the potential impacts from the increase in impervious surfaces.
- Planting a colorful patchwork of native, low-growing, ground cover plants (as an alternative to the lawn area) that will attract pollinators, bear foot traffic, and require little to no maintenance (i.e. mowing, fertilization) accompanied by an educational kiosk on the benefits of such lawn alternatives.

If these mitigation measures are not feasible to the greatest extent possible, DEEP recommends including alternative designs that were considered as well as the justification to remove all vegetation/trees from this site without replanting, in either the post-scoping notice or potential Environmental Impact Evaluation.

4. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment.

Ryan Mowrey, Remediation Division, Ryan.Mowrey@ct.gov

The Bigelow Mill site across the street at 55 Main Street has documented soil detections of VOCs, SVOCs, metals, and pesticides. If site operations were similar at this mill, these are all potential hazardous compounds at the site that will need to be properly addressed. In addition, PFAS and 1,4 Dioxin will need to be included in any soil analysis conducted on site due to the site's historical carpeting operation. DEEP is aware of the plan is for a proper remedial investigation to be conducted following

the Brownfield program requirements, so these issues should be addressed through that process.

5. A substantial increase in the type or rate of energy use as a direct or indirect result of the action.

No comments received.

6. Effect on air quality.

No comments received.

7. Effect on existing land resources and landscapes, including coastal and inland wetlands.

No comments received.

8. Adequacy of existing or proposed utilities and infrastructure.

No comments received.

9. Effect on greenhouse gas emissions as a direct or indirect result of the action.

No comments received.

10. Effect of a changing climate on the action, including any resiliency measures incorporated into the action.

No comments received.

11. Additional Comments/ Concerns:

Shalyn Zappulla, Fisheries Division, Shalyn.Zappulla@ct.gov

Staff reviewed land use maps around the project area and found that there is large amount of development, agriculture, and turf/grass near the Connecticut River.

According to Connecticut's Changing Landscape study by UConn CLEAR, between 1985 and 2010, CT lost 190 mi^2 of forest, lost 39.5 mi^2 of riparian corridors, and gained 149 mi^2 of developed land.

Staff also reviewed local drainage basin maps and impervious surface level maps of the proposed project area. Staff concluded that existing impervious coverage surrounding the project area ranges from 0-5% in some areas to over 25% in other areas. Effects of impervious area to aquatic ecosystems can include changes to

water chemistry, species assemblages and diversity, increased runoff causing erosion, increased stream width, deeper channels, increased turbidity, and introduction of pollutants, decreased flows, increased flashiness, sedimentation and loss of instream pools, loss of woody debris, loss of riparian vegetation, and loss of natural floodplain and groundwater recharge. Watershed impervious coverage of just 10% and sometimes much less can have significant effects on aquatic ecosystems and their functions.

DEEP staff recommend addressing concerns with the proposed increase in impervious cover, and mitigation considerations, in the post-scoping notice or potential Environmental Impact Evaluation.

List of permits:

Federal Section 404 Clean Water Act, Inland, Water Quality Certification (WQC)

☐ Required for this project.

☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. Wetlands and Watercourses should be clearly field delineated by a qualified soil scientist. If work is being proposed in a wetland or watercourse (crossings, fill, structures, culverts etc.), contact the Army Corps of Engineers to determine if it is within their jurisdiction.

☐ Not required.

State 401 Water Quality Permit

☐ Required. (if a federal 404 WQC is required, a state 401 is also required because the programs are tied together)

☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. For a pre-application meeting, contact: Susan.jacobson@ct.gov (for projects in towns that are west of the CT River) or Darcy.winther@ct.gov (for projects in towns that are on the CT River or east of the river).

☐ Not required.

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP). Note: Without detailed plans, several options might be checked, please review these options to determine which is applicable for the project.

☒ If between one and five acres of disturbance and approved at the local level, not required to register with DEEP.

☐ If five or more acres of disturbance and approved at the local level, must complete registration form and Stormwater Pollution Control Pan to DEEP at least 60 days prior to the initiation of construction. Registrations shall include a certification by the Qualified Professional who designed the project and a certification by a Qualified

Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. For further information, contact the division at 860-424-3025 or DEEP.StormwaterStaff@ct.gov

☒ Projects exempt from local permitting (conducted by government authorities) disturbing over one acre must submit a registration form and Stormwater Pollution Control Plan to DEEP at least 60-90 days, as identified by the permit, prior to initiating construction.

The Construction Stormwater General Permit registrations must be filed electronically through DEEP's ezFile Portal. Additional information can be found online at: Construction Stormwater GP.

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. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Eric Hammerling, Office Director, DEEP/ERSI

FUSS & O'NEILL
59 Elm Street, Suite 500
New Haven, CT 06510
203.374.3748
www.fando.com

November 11, 2025

Almariet Roberts
Department of Economic and Community Development
450 Columbus Boulevard
Hartford, CT

RE: Response to Comments
Scoping for Enfield Station Remediation Project
33 North River Street, Enfield, Connecticut
Fuss & O'Neill Reference No. 20170088.A20

Dear Ms. Roberts:

Please see the following responses from Fuss & O'Neill to the letter received from Jordan DiDomenico of Connecticut Department of Energy & Environmental Protection dated 5/23/2025 submitted in response to the scoping requirements of the Connecticut Environmental Policy Act for the Enfield Station Remediation Project at 33 North River Street in Enfield, Connecticut.

1. **Effect on water quality, including surface water and groundwater.**
Comment: Marlene Krajewski, Water Planning and Management Division, Marlene.Krajewski@ct.gov. The site is located directly adjacent to the Connecticut River (CT4000-00_03), which is an impaired waterbody and has a Connecticut Statewide Bacteria Total Maximum Daily Load for E. coli. Due to existing contamination at the site and to minimize the water quality impacts to nearby surface waters (Connecticut River) during both remediation and future redevelopment, proper management measures for stormwater and sediment should be taken.

Response: A detailed Sediment & Erosion Control Plan for Construction and Stormwater Management Plan and Report have been developed in accordance with the Town of Enfield and 2024 Connecticut Stormwater Quality Manual Requirements. Further discussion and planning were coordinated with the Town of Enfield during the local approvals process to ensure the risk of erosion, sediment, and dust impacts will be minimized to the greatest extent possible during soil management and cleanup activities. Post Construction Stormwater Management is provided by a stormwater system that includes both infiltration systems and a Hydrodynamic separator to provide water quality treatment for the final development.

Based on provided schematic plans provided, this redevelopment will add a large amount of impervious surface in both the form of the buildings and parking spaces in close proximity to the Connecticut River. The redevelopment also appears to include removing a large amount of riparian vegetation, which currently protects the streambank and absorbs some pollutants from surface runoff. As such, DEEP recommends incorporating the use of Green Infrastructure and/or Low Impact Development in this project, retaining a riparian buffer, and encourages sustainable snow/ice removal practices in the winter

(i.e. Green SnowPro) to minimize/reduce the impact of polluted stormwater from reaching receiving surface waters, to reduce further impairment to the Connecticut River, and to maintain the streambank.

Response: Based on site environmental and geotechnical investigations, the majority of the site consists of impacted soils, urban fill, and historic building foundation remnants. The existing vegetation present on site has largely grown in over the past 40+ years from what was once a developed industrial power generation plant for the Bigelow Carpet Mill. The majority of vegetation on the site needs to be removed in order meet the site cleanup criteria of the State Brownfields program and for the earthwork/grading of the proposed development.

To provide water quality treatment for the proposed development both infiltration systems and a Hydrodynamic separator are proposed as part of the stormwater management system. The sloped landscape area between the building / parking areas and the river will be planted with a no-mow fescue mix. Vegetation below the existing seawall along the Connecticut River will remain in its current condition.

Environmental friendly snow/ice removal products will be used and snow removal will be professionally managed and brought off site during large snow events. This will greatly minimize the likelihood of snow melt reaching the waters of the Connecticut River.

The project construction limits do not extend into the 100-year floodplain, which is approximately at elevation 54. The existing riparian buffer within the 100-year floodplain, varying in width from approximately 20'-46' wide by 380' long at the southeast portion of the site that fronts the Connecticut River, will remain undisturbed. In addition, there is a sloped vegetated zone approximately 27'-30' in width between the building/parking lot down to the riverwalk that will be planted with a no-mow fescue mix to further slow runoff and infiltrate onto the site before reaching the Connecticut River.

Comment: Melissa Mostowy, Water Planning and Management Division, Melissa.Mostowy@ct.gov. The site is located within the Connecticut Water Company's Northern Region - Western System, so public water supply will be available for the proposed development sites if needed. If the site requires more than 50,000 gallons per day to be withdrawn from ground or surface waters on-site, DEEP's Consumptive Water Diversion Program should be consulted.

Response: The site does not require water to be drawn from ground or surface waters on-site.

Comment: Ryan Mowrey, Remediation Division, Ryan.Mowrey@ct.gov. The groundwater under the historical mill area has the potential to be contaminated. The Bigelow Mill site that was remediated across the street at 55 Main Street historically had petroleum compounds, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, and metals detected in groundwater. If groundwater is encountered on site during construction activities proper characterization should be done to make sure that the groundwater is not contaminated. In addition to the chemicals listed above, per- and polyfluoroalkyl substances (PFAS) and 1,4 Dioxin should be included in any analysis of the soil and

groundwater. Due to Bigelow Mill's association with carpeting, these chemicals have the potential to be present.

Response: Groundwater will be analyzed, and a dewatering program will be instituted if groundwater is encountered during construction activities. Following construction, a new monitoring well network will be installed. Compliance with the standards for groundwater will be based on the following approach:

- **The conceptual site model for the groundwater plumes will be evaluated using a monitoring well network installed across the parcel.**
- **Background concentrations will be established for upgradient areas. Contaminant plume geometry will be evaluated relative to any changes that may have occurred as a result of removal of defunct subgrade infrastructure and installation of new stormwater management systems.**
- **The effectiveness of soil remediation activities will be evaluated to prevent the pollution of groundwater by substances from the release area.**
- **The use of alternative surface water protection criteria under RCSA 22a-133k-3(b) will be evaluated.**
- **The effectiveness of monitored natural attenuation to achieve compliance with an applicable criteria for a substance within a reasonable timeframe.**

2. **Effect on flooding, in-stream flows, erosion, or sedimentation.**
Comment: Darcy Winther, Land and Water Resources Division, Darcy.winther@ct.gov. Flood Management Certification: If proposed activities are being funded or conducted by a state agency AND are being conducted within a FEMA designated floodplain, the applicant should consult with the DEEP's Land and Water Resources Division for information on how to comply with the States Flood Management Statutes and Regulations. For information on identifying if the site is in a flood zone, please see FEMA's website: FEMA Flood Map Service Center. For information on Flood Management Certification, please see DEEP's website: Flood Management Certification Fact Sheet.

   Response: We are aware of these requirements and will be submitting an application to DEEP for Floodplain Management Certificate.

3. **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.**
Comment: Robin Blum, NDDB Program, Wildlife Division, Robin.Blum@ct.gov. This site appears to be in a Natural Diversity Data base (NDDB) area. An NDDB review will need to be performed in order to demonstrate compliance for any permit applications or use of state funding.

   Response: We are aware of this requirement and will be submitting an NDDB review as part of the application to DEEP for Floodplain Management Certificate.

Comment: Shalyn Zappulla, Fisheries Division, Shalyn.Zappulla@ct.gov. DEEP Fisheries Division staff have concerns about developing riparian habitat and converting a forested buffer into impervious surfaces and lawn. The portion of the Connecticut River in the site's vicinity is home to a diverse fish species assemblage and one of the largest diadromous runs in the east coast US. These migratory fish include Federally endangered Atlantic and Shortnose sturgeon, state-listed Blueback Herring, Alewife, American Eel, American Shad, and Sea Lamprey. Additional resident species include Banded Killifish, Black Crappie, Bluegill, Bowfin, Channel Catfish, Common Carp, Fallfish, Green Sunfish, Largemouth Bass, Pumpkinseed, Redbreast Sunfish, Rock Bass, Smallmouth Bass, Spottail Shiner, Walleye, White Catfish, White Sucker, and Yellow Perch.

Rivers attract development, industry, and agriculture. Chipping away at remaining riparian buffers harms the aquatic (and terrestrial) ecosystem. Land disturbance has a direct effect on water quality and aquatic resources, and vegetated buffers are crucial to protect both. Vegetated buffers filter out nutrients and pollutants, stabilize banks, provide food, provide and create habitat, cool temperatures through evapotranspiration and shading, mitigate flooding, and control sedimentation. Vegetated buffers provide these services at no cost, where the cost to correct these issues can be extensive. To put in economic terms, the following study shows the dollar value in what an ecosystem can provide: "Economic values for ecosystem services: A global synthesis and way forward," by Brander, L.M. et al., 2024. The recommended size of a buffer varies with its purpose. For example, recommendations can range from 100 feet to control sedimentation, nutrients, and pollutants, to 30-200 feet to stabilize banks and control floods, 50-400 feet to provide fish habitat and sustain aquatic insect populations, and 30-100 feet to cool water temperatures (DeMeo et al., 2005). This is not an exhaustive list, but buffers recommended to maintain healthy fish populations are often at least 50-300 feet in width.
To mitigate potential impacts of the project, DEEP staff recommend:

• In the post-scoping notice or Environmental Impact Evaluation, the developer can explain why a seawall is needed or if it can be removed and a robust vegetative buffer can be established in its place for the length of the property.

Response: The preliminary plans included in the Brownfields application have been revised as the project progressed. As a result, approximately 380' of seawall depicted in the application documents has been removed from the project. Instead, the existing riparian buffer within the 100-year floodplain, varying in width from approximately 20'-46' wide by 380' long at the southeast portion of the site that fronts the Connecticut River will remain undisturbed. A new seawall will be constructed behind the limits of the existing seawall.

• A minimum of a 100-foot-wide woody riparian buffer is recommended to be established along the Connecticut River that extends the length of the property.

Response: This is not possible due to the soil management and environmental cleanup required for the site to meet Brownfields remediation requirements. The existing 380' section of riparian buffer that exists today will remain undisturbed.

• Incorporating green infrastructure, rain or rooftop gardens, and a stormwater management plan to mitigate the potential impacts from the increase in impervious surfaces.

Response: The proposed design includes a stormwater management system consisting of two infiltration systems and a hydrodynamic separator to provide water quality treatment.

• Planting a colorful patchwork of native, low-growing, ground cover plants (as an alternative to the lawn area) that will attract pollinators, bear foot traffic, and require little to no maintenance (i.e. mowing, fertilization) accompanied by an educational kiosk on the benefits of such lawn alternatives.

Response: The overall site planting plan consists entirely of native shrub and tree species that are to be planted in substantial plantings beds around the building and parking areas. The sloped vegetated area between the building and Connecticut River consists of a no-mow fescue mix with five fescue species that will stabilize the soil and require little to no maintenance. A vegetated swale at the bottom of the slope adjacent to the Riverwalk will be planted with New England Conservation Wildlife seed mix, which contains fifteen species of native grasses, perennials, and fescues to attract pollinators and provide seasonal color.

If these mitigation measures are not feasible to the greatest extent possible, DEEP recommends including alternative designs that were considered as well as the justification to remove all vegetation/trees from this site without replanting, in either the post-scoping notice or potential Environmental Impact Evaluation.

Response: Based on site environmental and geotechnical investigations, the majority of the site consists of impacted soils, urban fill, and historic building foundation remnants. The majority of vegetation on the site needs to be removed in order meet the site cleanup criteria of the State Brownfields program and for the earthwork/grading of the proposed development.

4. **Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment.**
Comment: Ryan Mowrey, Remediation Division, Ryan.Mowrey@ct.gov. The Bigelow Mill site across the street at 55 Main Street has documented soil detections of VOCs, SVOCs, metals, and pesticides. If site operations were similar at this mill, these are all potential hazardous compounds at the site that will need to be properly addressed. In addition, PFAS and 1,4 Dioxin will need to be included in any soil analysis conducted on site due to the site's historical carpeting operation. DEEP is aware of the plan is for a proper remedial investigation to be conducted following the Brownfield program requirements, so these issues should be addressed through that process.

Response: Operations at the Site did not include carpet manufacturing and only consisted of power plant operations. Constituent of concern associated with power plant activities include VOCs, polynuclear aromatic compounds (PAHs), polychlorinated biphenyls (PCBs), extractable total petroleum hydrocarbons (ETPH), pesticides, and heavy metals.

5. **A substantial increase in the type or rate of energy use as a direct or indirect result of the action.**
   No Comments Received

6. **Effect on air quality.**
   No Comments Received

7. **Effect on existing land resources and landscapes, including coastal and inland wetlands.**
   No Comments Received

8. **Adequacy of existing or proposed utilities and infrastructure.**
   No Comments Received

9. **Effect on greenhouse gas emissions as a direct or indirect result of the action.**
   No Comments Received

10. **Effect of a changing climate on the action, including any resiliency measures incorporated into the action.**
    No Comments Received

11. **Additional Comments/Concerns:**
    Comment: Shalyn Zappulla, Fisheries Division, Shalyn.Zappulla@ct.gov. Staff reviewed land use maps around the project area and found that there is large amount of development, agriculture, and turf/grass near the Connecticut River.

    According to Connecticut's Changing Landscape study by UConn CLEAR, between 1985 and 2010, CT lost 190 mi2 of forest, lost 39.5 mi2 of riparian corridors, and gained 149 mi2 of developed land.

    Staff also reviewed local drainage basin maps and impervious surface level maps of the proposed project area. Staff concluded that existing impervious coverage surrounding the project area ranges from 0-5% in some areas to over 25% in other areas. Effects of impervious area to aquatic ecosystems can include changes to water chemistry, species assemblages and diversity, increased runoff causing erosion, increased stream width, deeper channels, increased turbidity, and introduction of pollutants, decreased flows, increased flashiness, sedimentation and loss of instream pools, loss of woody debris, loss of riparian vegetation, and loss of natural floodplain and groundwater recharge. Watershed impervious coverage of just 10% and sometimes much less can have significant effects on aquatic ecosystems and their functions.

    DEEP staff recommend addressing concerns with the proposed increase in impervious cover, and mitigation considerations, in the post-scoping notice or potential Environmental Impact Evaluation.

    Response: While the existing site is currently overgrown it consists of existing building foundations, site debris and contaminated materials from previous development. The proposed development is intended to remediate / cap contaminated materials and stabilize the site. To

provide water quality treatment, the proposed impervious surfaces are routed through a stormwater management system that includes two infiltration systems and a hydrodynamic separator. The approved Stormwater Management Plan and Report have been developed in accordance with the Town of Enfield and 2024 Connecticut Stormwater Quality Manual Requirements to address the proposed impervious cover on site and meet all stormwater requirements.

List of Permits:

- **Federal Section 404 Clean Water Act, Inland, Water Quality Certification (WQC)**
  ☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. Wetlands and Watercourses should be clearly field delineated by a qualified soil scientist. If work is being proposed in a wetland or watercourse (crossings, fill, structures, culverts etc.), contact the Army Corps of Engineers to determine if it is within their jurisdiction.

  Response: No fill is proposed in the Waters of the U.S. No work is proposed within the 100-year floodplain. A wetland delineation by a qualified soil scientist was performed and no work is proposed in the wetlands.

- **State 401 Water Quality Permit**
  ☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. For a pre-application meeting, contact: Susan.jacobson@ct.gov (for projects in towns that are west of the CT River) or Darcy.winther@ct.gov (for projects in towns that are on the CT River or east of the river).

  Response: No fill is proposed in the Waters of the U.S. No work is proposed within the 100-year floodplain. A wetland delineation by a qualified soil scientist was performed and no work is proposed in the wetlands.

- **General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP.) Note: Without detailed plans, several options might be checked, please review these options to determine which is applicable for the project.**
  ☒ If between one and five acres of disturbance and approved at the local level, not required to register with DEEP.

  Response: This project is under 5 acres and was locally approved by the Town of Enfield. Therefore, it is not required to register with DEEP for a Construction Stormwater General Permit.

  ☒ Projects exempt from local permitting (conducted by government authorities) disturbing over one acre must submit a registration form and Stormwater Pollution Control Plan to DEEP at least 60-90 days, as identified by the permit, prior to initiating construction.

Response: This project was locally approved and designed in accordance with local and state regulations. The project is being conducted by a private developer, is under 5 acres, and was locally approved by the Town of Enfield. It is our understanding that this requirement does not apply.

Sincerely,

Greg Wilson, PLA
Project Manager