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:	1/30/2024
Name of Project/Action:	Scovil Mill Remediation Project
Project Address(es):	11 Candlewood Hill Road
Affected Municipalities:	Haddam, CT
Sponsoring Agency(ies):	DECD
Agency Project Number, if applicable:	2021-061-075-10000
Project Funding Source(s)/Program(s), if known:	Municipal Brownfield Grant Program 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: Indicate status of SHPO and/or NATHPO review.

☒ 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: Mark Burno, 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 action will enable a brownfield to be remediated and cleaned up to support redevelopment and economic activity.

Description of the Proposed Action:

Town of Haddam has been awarded a grant of $1,800,000 to abate and remediate two former mill buildings that were part of the D&H Scovil Hoe Company Mill. The remediation will consist of capping of contaminated soils, construction of engineered controls and/or soil excavation. Following remediation, the Development Partner plans include the adaptive reuse of the existing buildings for commercial purposes, to support the revitalization of Higganum's Village Center.

Alternatives Considered:

No action alternative

Public concerns or controversy associated with the proposed action:

None 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:
Anticipated ownership upon project completion:	☐ N/A, ☐ State; ☒Municipal, ☐ Private, ☒ Other: Following the environmental remediation, the property will be transferred to the Redevelopment Partner.

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) (potential); The project team & consultants are currently evaluating the site elevations to determine if any remediation or redevelopment activities are proposed within the floodplain.
☐ 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 significant adverse impact to groundwater and surface water quality. Candlewood Hill Brook flows along the southern border of the site and is classified as "A" quality. According to the DEEP comments, Candlewood Hill Brook is located on the property, directly south of the mill buildings. Candlewood Hill Brook is a tributary to Higganum Creek and Ponset Brook. Ponset Brook is an unimpaired river, and a potential source for public supply, therefore the water quality of Ponset Brook and its tributaries should be protected to the greatest extent possible. To minimize the water quality impacts of the redevelopment, proper management measures for stormwater and sediment should be taken, including during the extensive remediation efforts planned for this project. The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. This general permit was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction as well as addressing discharges of other stormwater pollutants from the site long term. Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control.
Effect on a public water supply system;	Staff from DEEP reviewed the location of this project and found that it is not in an aquifer protection area. According to the CT DEEP interactive Water Quality Classification Map, groundwater at the site and surrounding area is classified as "GA". Class GA designated uses are existing private and potential public or private

	supplies of water suitable for drinking without treatment and baseflow for hydraulically-connected surface water bodies.
Effect on flooding, in-stream flows, erosion or sedimentation;	Based on the FEMA/FIRM maps, portions of the proposed remediation and redevelopment activities may be located within a designated floodplain (100-yr or 500-yr) or floodway. The project engineering is currently evaluating the site elevations relative to floodplain boundaries. A Flood Management Certification will be obtained (through approval from DEEP) for all applicable proposed activities before any work is initiated. The proposed work should make efforts to maintain a vegetated buffer along Candlewood Hill Brook, during and after construction. During construction proper stormwater and erosion controls will be important to keeping the contaminated sediments on the site from reaching the brook.
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;	Based on a Phase I Environmental Site Assessment completed by Fuss & O'Neill, dated February 2018, structures located on the Site include two two-story brick buildings, an emergency generator shed, and associated paved parking and driveway areas. The remainder of the Site is comprised of grass or overgrown brush. The Site is currently unoccupied but was most recently used by the State of Connecticut Department of Transportation as a repair and maintenance facility. The two main buildings were historically part of the D&H Scovil Hoe Company Mill No. 4. The mill, which manufactured farming equipment such as planters, hoes, and milled feldspar, operated the Site from approximately 1844 through 1942. The CT State Historic Preservation Office (SHPO) reviewed the Part 1 Application ""Determination of Historic Structure Status" and determined that the building appears to be on the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by SHPO. SHPO identified the following resources to contribute to the National Register eligible historic district: Forge Shop (c.1889) & Drop Forge Shop (C 1905) SHPO has reviewed the remediation scope and determined that the undertaking will have a conditional no adverse effect to historical resources. However, any plan to remove historic building fabric such as windows, doors, interior paint and trim prior to review and approval by the SHPO and NPS under the historical rehabilitation tax credit program could jeopardize the project's eligibility for tax credits. The Part 2 Application "Request for Approval of Proposed Rehabilitation Plan" was submitted to SHPO. SHPO determined that he proposed rehabilitation plan described in the application meets the Standards provided specific conditions are met.

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;	DEEP staff reviewed Natural Diversity Database (NDDB) mapping and found that the project site is not currently in an NDDB area. The maps were reviewed by DECD on 1/29/2024 and despite the changes to the NDDB in 2023, the site remains outside of any NDDB areas and is in an upgradient location from a NDDB area to the east. According to the DEEP, shaded areas ("blobs") on the maps show approximate locations of state-listed and federal-listed species and important natural communities. When viewing the NDDB maps, please consider the entire area affected by a project, including any potential runoff or other disturbance. Locations outside of the mapped areas are not necessarily free of listed species; these locations may not have been surveyed and there may be potential impacts from disturbance in these locations. Candlewood Hill Brook is located on the property, and directly south of the mill buildings. Candlewood Hill Brook is not currently stocked with trout, but the nearby Ponset Brook and Bible Rock Brook are stocked.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	Given the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated. Any residual impacted from fill and historic activities will be address as part of the site investigation and cleanup. The following is a summary of DEEP comments related to Solid Waste Disposal requirements; however, it should be noted that the redevelopment plans call for adaptive-reuse of the existing buildings and demolition is not anticipated. The comments are included in this section should historical demolition debris be encountered during site remediation activities. DEEP indicated that the disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g., contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing

	facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. DEEP also explained that construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. Pursuant to section 22a-241a of the CGS, the state set a goal of 60% rate of diversion from disposal for municipal solid waste by the year 2024 and adopted that goal in the state's December 2016 Comprehensive Materials Management Strategy. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. If abatement is required for asbestos containing materials (ACM), these materials are regulated as a "special waste" in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these materials may only be disposed of at facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities. Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (i.e., paint, roofing, flooring, insulation, etc.). EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. The guidance can be found at: PCBs in Caulk. Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors. roofs, ventilation, etc.) and demolition projects, whenever possible. However, the continued use of such PCB materials is prohibited and, where it is identified, it must be

	addressed. EPA recommends testing caulk that is going to be removed as the first step to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP. In addition to asbestos and PCBs, DEEP has indicated that demolition debris may also be contaminated with lead-based paint, chemical residues, or other materials that require special disposal.
Substantial aesthetic or visual effects;	The project is not expected to cause substantial aesthetic or visual impacts in the area. As part of the municipal site plan approval, the Town of Haddam Planning & Zoning department may require controls to mitigate the effects of proposed site lighting plan through best management practices.
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) and 6 (Promote Integrated Planning Across All Levels of Government).
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 for years. Disruption of existing communities, municipal/regional plans is 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);	The site is vacant. Any potential impacts can be mitigated by adopting best management practices to reduce congestion during design, permitting, construction and operational phase of the project. The impacts will be mitigated through implementation of controls established by the local Site Plan approval by the Town of Haddam Planning & Zoning Department.

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 vacant. Impacts will be mitigated during permitting and design of project.
The creation of a hazard to human health or safety;	The proposed action, remediation of the site, will reduce risk associated with existing impact at the site.
Effect on air quality;	DECD will be advising client to adopt best management practices to reduce potential air quality impacts.
Effect on ambient noise levels;	No significant adverse direct, indirect, or cumulative impacts to ambient noise levels from the redevelopment are anticipated. Potential impacts during construction and site operation will be mitigated through implementation of controls and restrictions established through the local Site Plan approval required by the Town of Haddam Planning & Zoning Department.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	Adverse effects to existing land resources and landscapes are not anticipated.
Effect on agricultural resources;	No direct, indirect, or cumulative adverse effects to agricultural resources.
Adequacy of existing or proposed utilities and infrastructure;	Several site utilities (septic system, stormwater, potable water, and site fire-suppression system) will be upgraded or installed as part of the site redevelopment. The installation/improvement to these utilities will improve the site conditions and will reduce impact at the site. All site utilities will be approved by the required municipal, local or state level agency review and best practices will be incorporated during site construction and subsequent site operations.
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;	No direct, indirect, or cumulative adverse effects to changing climate are anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	The DEEP indicated that the project is located adjacent to a watercourse, and there are no specific site plans showing the work area or any possible identified wetlands. If any work is to be conducted within wetlands such as filling portions or requiring a pipe or culvert, permitting may be required. If these activities are taking place, the applicant is advised to contact the Army Corps of Engineers first, to determine if the activities are in federally regulated wetlands or watercourses.
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

Flood Management Certification

General Permit for the Discharge of Groundwater Remediation Wastewater

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities

Army Corps of Engineers (as applicable)

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.

PART VII - Public Comments and Sponsoring Agency Responses:

No public comments provided during scoping notice period.