

**State of Connecticut, Department of Public Health
Drinking Water Section, Drinking Water State Revolving Fund (DWSRF)
ENVIRONMENTAL ASSESSMENT SUMMARY**

Date:	July 7, 2020	Staff Contact:	Eric McPhee
Applicant PWS Name:	Town of Brookfield	Town:	Brookfield
PWSID:	CT0181122		
Project Name:	Huckleberry Hill School Water Main Extension		
Funding Source:	Drinking Water State Revolving Fund		
State Funds:	\$805,000.00		

This assessment is being conducted in conformance to the generic Environmental Classification Document for Connecticut state agencies to determine Connecticut Environmental Policy Act (CEPA) obligations

Project Description: Huckleberry Hill School at 100 Candlewood Lake Road in Brookfield is a public water system that is served by two public wells. Routine monitoring of the water from these wells indicates that levels of chloride have been progressively increasing since 2007. Public Water System Monitoring Program data shows measured chloride levels of 53 milligrams per liter (mg/L) in 2004, 86 mg/L in 2007, 107 mg/L in 2010, and 193.5 mg/L in 2019, which is approaching the Connecticut State Maximum Contaminant Level (MCL) for chloride of 250 mg/L. The homes between 63 and 103 Candlewood Lake Road are served by private wells and are also experiencing elevated sodium and chloride levels in their ground water, with sodium concentrations as high as 230 mg/L (CT private well guidance for sodium levels in drinking water those at risk for high blood pressure is 100 mg/L) and chloride concentrations up to 680 mg/L. There are approximately 41 homes, and two small businesses (shared building) that are along this section of road.

The Town of Brookfield is proposing to proactively address the potential water quality standard exceedance by connecting the Huckleberry Hill School to an existing Aquarion Water Company water main located on Nabby Road. Approximately 3,700 linear feet of new 12-inch water main is proposed to be installed along Candlewood Lake Road to the Huckleberry Hill Elementary School. The water main will be available for the homes and businesses with individual drinking water wells along the route if they choose to connect. The Town will be collecting a benefit assessment from every property along the route which will cover the cost of the water main, including the service lines from main to curb. Individual property owners would be responsible for covering the cost of a service connection from the building to the curb.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of environmental significance (direct/indirect)

1. Impact on air and water quality or on ambient noise levels
 - a. Air Quality –The proposed project is not expected to cause significant impacts to air quality.
 - b. Water Quality – Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as “potable water system maintenance wastewaters” under the [Comprehensive General Permit](#) for Surface Water and Groundwater (Comprehensive General Permit). No registration is required under the Comprehensive General Permit for this discharge, but Cedar Ridge Apartments Public Water System must comply with operating conditions and effluent limits of the Comprehensive General Permit.

- c. Ambient Noise Levels - The proposed project is not expected to cause significant noise in the immediate area;
2. Impact on a public water supply or serious effects on groundwater, flooding, erosion, or sedimentation
 - a. Water Supply – The proposed project is intended to proactively address a potential water quality standard exceedance by connecting the Huckleberry Hill School to the Aquarion Water Company’s water main.
 - b. Water Diversion- Section 22a-377(b)-1(5) of the Regulations of Connecticut State Agencies exempts this activity regardless of the proposed volume of water to be provided given that the subject distribution main is taking place entirely within an Exclusive Service Area of the Aquarion Water Company:

*Diversion of water, or increase in the capacity to divert water, incidental to providing water treatment, **extending distribution mains**, or maintaining or expanding service **within a service area**, provided the quantity of water withdrawn from any source does not exceed the quantity authorized pursuant to any applicable permit issued or registration filed under section 22a-368 of the Connecticut General Statute.*

The proposed project is entirely within the Exclusive Service Area of Aquarion Water Company which has adequate capacity to serve this extension without exceeding existing diversion permits.
 - c. Groundwater – The proposed project is not expected to cause significant impacts to groundwater.
 - d. Flooding – No significant impacts expected.
 - e. Erosion or Sedimentation – The Town of Brookfield will ensure that best management practices are implemented during construction to control erosion and sedimentation.
 3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows – No significant impacts expected.
 4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings - The proposed project is not expected to cause negative impacts.
 5. Effect on natural communities and upon critical species of animal or plant and their habitats: interference with the movement of any resident or migratory fish or wildlife species – A recent NDDDB review was conducted on the Huckleberry Elementary School property and revealed a special concern plant, hairy fruited sedge, on the southeastern corner of the existing athletic fields. The athletic field may not be in the vicinity of the proposed project but should be taken into consideration if construction extends beyond the route for the water main.

The recommended strategies to avoid or minimize potential impacts to the eastern box turtle apply to this project because the work is primarily along the road. DEEP’s Wildlife Division recommends strategies for protection, such as contractor awareness, relocation efforts to remove any turtle out of harm’s way, potential for exclusionary fencing at the limits of disturbance, and oversight during construction that the protection measures are put into practice.

Please be advised that should state permits be required, a formal application may need to be sent to the Wildlife Division prior to submitting permit applications for a detailed review of the species that may

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

6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – The proposed project is not expected to cause negative impacts.
7. Substantial aesthetic or visual effects -The project is not expected to cause substantial aesthetic or visual impacts in the area.
8. Inconsistency with the written and/or mapped policies of the statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency –The proposed project is consistent with Policy 1 of Growth Management Principle #5: “**UTILIZE** a multiple barrier approach, including source water protection and appropriate treatment, to ensure the availability of safe and adequate public water supplies that meet or exceed state and federal drinking water standards.” The Town of Brookfield is employing the second barrier of Risk Management by discontinuing the use of public drinking water sources with rising contaminant levels and connecting to an existing public water system that meets the standards established in the Safe Drinking Water Act.
9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans-The proposed project is consistent with the Coordinated Water System Plan Part III: Final Integrated Report Western Public Water Supply Management Area, May 22, 2018: “Water utilized for public drinking water in the region tends to be variable with respect to quality and quantity. Elevated concentrations of arsenic, radioactive elements, and/or iron and manganese are prevalent in public water system well supplies, and treatment can be costly. This may present a disproportionate burden on small CWSs and Non-Community water systems, and it may necessitate extending public water systems into areas presently served by private wells or creation of new public water systems as noted below. Examples occur in Brookfield, which has small systems that have dealt with recent water quality challenges related to arsenic, uranium, and other constituents.”
10. Displacement or addition of substantial numbers of people - No significant impact expected.
11. Substantial increase in congestion (traffic, recreational, other) – The proposed project is not expected to create substantial traffic congestion in the area.
12. A substantial increase in the type or rate of energy use as a direct or indirect result of the action - No significant impact expected.
13. The creation of a hazard to human health or safety – No significant impact expected.
14. Any other substantial impact on natural, cultural, recreational or scenic resources - No significant impact expected.

Conclusions:

Based on the DPH’s environmental assessment of the proposed project which includes a review of the comments provided by the DEEP dated June 2, 2020, it has been determined that the project does not require

the preparation of an Environmental Impact Evaluation (EIE) under CEPA. The DPH will coordinate with the Town of Brookfield to ensure that the recommendations by the DEEP are implemented.