



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

December 14, 2023

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Paul Aresta
Executive Director

Eric Hammerling
Office Director, Environmental Review & Strategic Initiatives (ERSI)
Department of Energy and Environmental Protection (DEEP)
79 Elm Street, Hartford, CT 06106
Eric.Hammerling@ct.gov

Dear Mr. Hammerling,

The Council on Environmental Quality (Council) offers the following comments regarding the DRAFT Batterson Park Study (Study), prepared for the General Assembly, as directed by Public Act 23-204.

The Study states that in June 2021, Special Act 21-15 awarded \$10 million in American Rescue Plan Act (ARPA) funds to the city of Hartford for Batterson Park, through a contract administered by DEEP, that was used to support the development of a Master Plan, removal of degraded buildings at the park, structural design proposals, and identifications of potential capital investments. In addition, GZA was contracted in August 2022 to perform a water quality study at Batterson Park Pond “with a goal of providing a preliminary assessment and understanding of potential feasibility to reopen a swimming beach at Batterson Park”.

DEEP’s Study concludes that “based on analysis of the available water quality data (including the results from historical and recent sampling), Batterson Park Pond is not suitable for swimming. Batterson Park Pond is best suited for non-contact recreational uses, such as boating, fishing, kayaking and bird watching.” The Council notes that the closest state parks to Hartford that allow swimming are located approximately 13 miles (driving) away at Stratton Brook State Park in Simsbury, and more than 18 miles (driving) away at Gay City State Park in Hebron. The Council also notes that there are limited public transit options from Hartford directly to these two closest state parks which allow swimming. Conversely, Batterson Park is located nine miles (driving) away from the Capitol Avenue area in Hartford and there are multiple public transit (bus) routes that provide service to the area. The importance of available public transit options with access to recreational areas is an important consideration that should be addressed in the Study since census data indicates that approximately 31 percent¹ of occupied housing units in Hartford, the city that owns the park, have “no vehicle available” to drive to state parks that offer opportunities for swimming. Furthermore, DEEP should consider the need and importance of Batterson Park Pond as a public cooling space, given the projected increase in temperatures associated with climate change.

The GZA report, which is included as Appendix IV in the Study, identifies several measures, with cost estimates, for improving water quality of Batterson Park Pond with the ultimate goal of possibly re-opening the Pond to swimming. DEEP’s Study states that “DEEP’s analysis of water quality comes to a significantly different conclusion when considering the likely impacts on fish and other aquatic life that would occur with the chemical treatments proposed by GZA,

the additional ongoing high costs required to install, maintain, and operate mechanical aeration systems...” However, there is limited information in the Study regarding the “likely impacts on fish and other aquatic life” associated with the mechanical and chemical measures identified by GZA. Furthermore, the only costs presented in DEEP’s Study for improving water quality include: 1) an estimate from 2004 from the Total Maximum Daily Load (TMDL) assessment, and 2) “calculations conducted as part of a recent watershed needs assessment”. The Council suggests that DEEP provide more detail regarding the technical feasibility, potential environmental impacts, and cost estimates (capital and operation) associated with measures identified in the GZA report and by DEEP for restoring the water quality that could allow for swimming at Batterson Park Pond.

Thank you for your consideration of the Council’s comments.

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive, flowing style.

Paul Aresta
Executive Director

¹ United States Census, American Community Survey, 2022 ACS One Year Estimate, S2504Physical Housing Characteristics for Occupied Housing Units; <https://data.census.gov/table/ACSST1Y2022.S2504?q=vehicles&g=160XX00US0937000>