

# ENVIRONMENTAL DUE DILIGENCE FOR LAND TRUSTS: CHALLENGES AND SOLUTIONS

## CONNECTICUT LAND CONSERVATION CONFERENCE

March 22, 2005

CONNECTICUT  
Land Conservation Council



East Haddam  
Land Trust



# ABOUT OUR SPEAKERS



**Keith Ainsworth**

Keith is an environmental and land use litigator in Connecticut for over three decades. Currently Acting Chair of the CT Council on Environmental Quality, former chair of the CT Bar Association Environmental Law section and a municipal first selectman (Haddam). intellectual disabilities.



**Cameron Beard,  
East Haddam Land Trust**

Cameron is the chair of the stewardship and land acquisition committees of the East Haddam Land Trust. He is a retired lawyer and a semi-retired farmer.



**Tim Myjak, EKI**

Tim is a University of Connecticut Graduate and CT Licensed Environmental Professional who has focused 31 years to environmental consulting focusing on due diligence assessment, investigations, remediation, and environmental compliance.



**David Melycher, EKI**

David is a CT LEP and MA LSP with 35 years of experience in investigation and remediation of properties. He is the Vice President of the Environmental Professionals Organization of Connecticut (EPOC) and has been an active participant in the Release Based Working Group that was established to assist Connecticut with the transition from the Property Transfer Program to a Release Based environmental program.



**Amanda Limacher,  
CT DEEP**

Amanda has worked in the Remediation Division of CT DEEP for 15 years overseeing the investigation and remediation of contaminated sites in southwest Connecticut and as a state expert on Environmental Use Restrictions. She is currently the Brownfields Coordinator. Amanda manages the CERCLA 128(a) Brownfields Grant Program, awarding approximately \$750,000 per year.



East Haddam  
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# The Excitement

# Buyers Remorse



# WHY DUE DILLIGENCE AND WHO IS IT USEFUL FOR

## Why

- Superfund Liability
- Avoid unexpected surprises
- CT DEEP's Grants Cannot Be Provided for Polluted Sites
- CT DEEP – Released Based Standards / Open Space Criteria

## Who Needs It

- Purchaser / Owners of Polluted Properties
- Banks / Lenders



## **Environmental Due Diligence**

Getting Started Early

What is the due diligence process

Why is due diligence important for conservation / open space


## **How Land Trust / Conservation Properties May Be Regulated**

Proposed Release Based Regulation Program

## **CT Brownfields Programs for Not for Profit / Open Space**

Identification of Resources

## **Case Study Honey Hill Farm East Haddam**

A man in a dark suit and patterned tie is speaking, gesturing with his hands. A green speech bubble with white text is positioned to his right.

**Stop us at any time  
with questions!!**

# **What We Will Cover Today**

# TYPICAL DUE DILIGENCE IN REAL ESTATE TRANSACTIONS



- 1 Termite inspection
- 2 Roof inspection
- 3 Inspection of HVAC and other building systems
- 4 Foundation/structural inspection
- 5 Utility inspection, e.g., sewer capacity, water pressure
- 6 Building code compliance, fire/life safety
- 7 Parking lot capacity, access, safety
- 8 Title survey, encumbrances

Why performed? To avoid unexpected surprises following purchase.  
Unexpected delays in use. Unexpected COST.

# TYPICAL DUE DILIGENCE IN REAL ESTATE TRANSACTIONS



## Environmental Due Diligence

Why? To identify potential environmental issues with a site, e.g., **potential** contamination, **use restrictions**, that could result in significant liabilities (costs) to purchaser post-closing to address and correct.

- ❖ *Environmental Due Diligence usually starts with a **Phase I ESA**.*

# ENVIRONMENTAL DUE DILIGENCE



**Start early.**

**Who Do you need  
to Satisfy ?**





# HOW THE PHASE I ESA CAME ABOUT

## CERCLA (1980)

You buy it, you own it, contamination and all. You are responsible for clean up.  
Not fair; “we didn’t know it was contaminated”.

## CERCLA Amendment (1986)

Provided defense (relief) against CERCLA. If you did not know and had no reason to know site was contaminated, you might not be held liable for cleanup. AKA “Innocent purchaser defense”

But, in order to claim “innocent purchaser”, demonstrate you did your due diligence first (conduct “all appropriate inquiries” or “AAI”).

What is AAI and how do you do it? Lots of confusion between 1986 and 1990 on what constituted AAI.

What types of inquiries and how much inquiry is enough?

## All Appropriate Inquires:

1990 – American Society for Testing and Materials (“ASTM International”)

Phase I Standard (standardized approach to AAI - “This is how you demonstrate AAI”).

Updated 1997, 2000, 2005, 2013, and 2021.

**ASTM E1527-21** is current Phase I ESA standard. Accepted as the AAI standard by U.S. EPA.



Picture Courtesy:  
[https://www.actenviro.com/cercla-hazardous-substances\\_\\_trashed/](https://www.actenviro.com/cercla-hazardous-substances__trashed/)

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

## What is a Phase I ESA?

- Assess property for the visual indicators of potential concern able uses and or releases
- First step in environmental due diligence – There are protocols
- Typically conducted on behalf of a potential purchaser (also sellers, banks, tenants)
- Identify potential environmental concerns associated with a property - contamination, that could present an environmental liability or business risk after the property is acquired
- Typically non-invasive, e.g., no sampling
- Performed on all types of sites, e.g., large open tracts to small urban sites
- Conducted in accordance with ASTM E1527-21 (the Phase I “standard”)
- 6 Month shelf life
- Here in Connecticut also have the Connecticut Department of Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD)

*For your budgeting based on complexities \$3,000 – \$9,000*

*4-6 weeks to complete*

# TYPICAL ELEMENTS OF PHASE I ESA (REQUIRED BY ASTM)

## Records Review

- Historical records (e.g., aerials, topos, Sanborns, city directories)
- Owner or Client-provided records; documents (prior reports)
- Environmental regulatory Database Search (EDR Radius Report, Lien search)
- Online public records, e.g., Geotracker
- Environmental regulatory and public agency records requests and reviews

## Site Reconnaissance

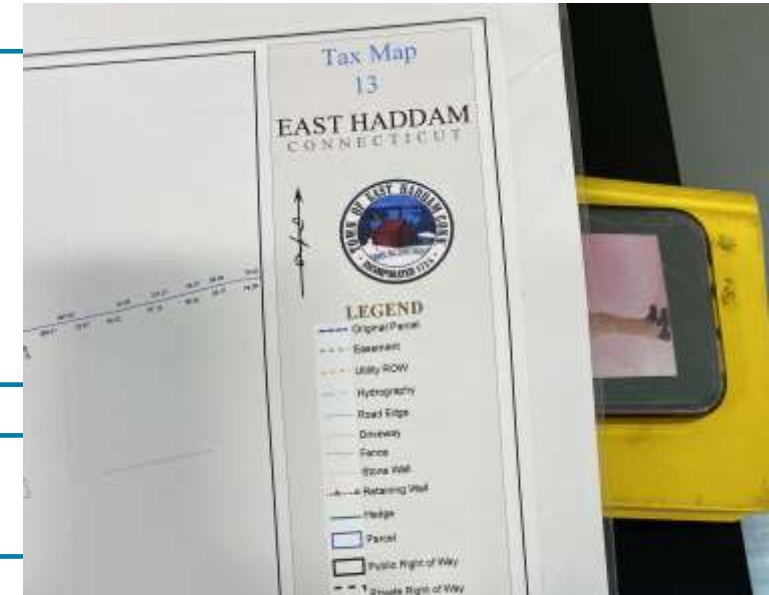
- Walk-through visual assessment

## Interviews

- Site owner and/or key occupant; site manager
- Local environmental regulator
- Any other person “knowledgeable” of property

## Reporting

- Discussion of RECs, opinions, figures, photos, supporting documentation



# PHASE I ENVIRONMENTAL SITE ASSESSMENT

## Examples of Environmental Liabilities/Business Risk

- Costs for:
  - Cleanup/remediation of on-site or off-site environmental contamination.
  - Delays in use of building/parcels /disruptions.
  - Delays in site redevelopment and re-use.
  - Restrictions on site use, e.g., no residential or passive recreation.
  - Mitigation and ongoing O&M, covenant obligations.
  - Satisfying environmental regulatory agencies.
  - Stigma.
  - Reduced re-sale value, limited interested buyers.



# PHASE I ESA OBJECTIVES PER ASTM

To identify Recognized Environmental Conditions (RECs) associated with a property.

## due to a release

the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment

## likely release

the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment

## future release

the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment

### The significance of a REC in a Phase I ESA Report:

- Can result in a lender / grant application declining a request.
- Can obligate the client to “continuing obligations”.

# PHASE I ESA OBJECTIVES PER ASTM

## Examples of RECs:

“the presence due to a release” – Prior reports indicate that VOCs were detected in soil samples collected from the subject property. Discuss significance of levels detected in light of client’s objectives for property.

“the likely presence” – Historical and database review indicates dry cleaner with PCE dry cleaning machines operated at the subject property during the 1960s through 1990s.

“material threat of release” – During the Site visit, heavily rusted and bulging drums that appeared to be full were noted on an unpaved ground surface at the rear of the Site building.



Picture Courtesy: <https://quizlet.com/384072113/cercla-and-superfund-flash-cards/>

# ASTM PHASE I OBJECTIVES

## Other RECs

### **Historical REC (e.g., Closed LUST site, remediation site)**

- A REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based unrestricted use criteria established by a regulatory authority), without subjecting the property to any required (e.g., engineered or institutional) controls.

### **Controlled REC (e.g., Site with vapor mitigation system, soil cap)**

- A REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

### **Business Environmental Risk (other Potential Issue or Finding) (e.g., former agricultural/orchard, but no soil data)**

- **Not a REC, but a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a property.**

# ELEMENTS OF THE CTDEEP SCGD THAT GO BEYOND THE ASTM PHASE

Area of Concern (AOC) per DEEP  
- Locations or areas at a site where hazardous waste and or hazardous substances (including petroleum products) have been or may have been used, stored, treated, handled, disposed, spilled, and/or released to the environment

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

## SITE CHARACTERIZATION GUIDANCE DOCUMENT



September 2007  
Revised December 2010

Amey Marrella, Commissioner

79 Elm Street, Hartford, CT 06106  
[www.ct.gov/dep/remediation](http://www.ct.gov/dep/remediation)  
860-424-3705



# PHASE I ENVIRONMENTAL SITE ASSESSMENT



## Key Takeaways from ASTM Standard:

- ❑ ASTM 4.3 – “Professional judgment” and experience is vital to the performance of a Phase I ESA.
- ❑ ASTM 4.5.1 – Reduce uncertainty. A Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding potential environmental issues associated with a property.
- ❑ ASTM 4.5.2 – Not exhaustive. Balance between reduction of uncertainty and cost and timing.
- ❑ ASTM 4.5.3 – Level of inquiry variable. Guided by type of property, risk tolerance of Client/buyer, and information developed.

## ASTM “non-scope items”

- *Asbestos and lead containing materials surveys*
- Radon
- Lead in drinking water
- Wetlands/flood zone
- Regulatory Compliance (environmental audit of operations)
- Cultural and historic resources
- Industrial hygiene (OSHA compliance)
- Employee health & safety
- Ecological resources and endangered species
- *Indoor air quality (vapor intrusion)*
- Biological agents
- Mold or moisture conditions
- *PCBs in building materials*
- *Emerging contaminants, e.g., PFAS*

WHAT IS NOT  
TYPICALLY  
INCLUDED IN  
A PHASE I



# HOW MIGHT AN OPEN SPACE / LAND TRUST PROPERTY / TRANSACTION BE REGULATED



Satisfy a grant



Satisfy a loan



Close out a notice of violation or consent order



Underground storage tank regulations



Structures – renovations or demolition



Material reuse – sent off site



On-Site Migration Off Site



CT Significant Environmental Hazard (SEH)

# THE PHASE II / III INVESTIGATION PROCESS

- Development and Updating of a Conceptual Site Model
- Identification of Data Quality Objectives
- Phase II – Presence and or Absence of A Release
- Phase III – Delineation of Release (s)



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

## SITE CHARACTERIZATION GUIDANCE DOCUMENT



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Revised December 2010

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79 Elm Street, Hartford, CT 06106  
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860-424-3705

**ASTM E1903-19  
Standard Practice for  
Environmental Site  
Assessments: Phase II  
Environmental Site  
Assessment Process**

# REMEDIAL ACTION PLANS – COST TO CLOSURE

- What will it take to demonstrate compliance
- What will the intended use be
- Who needs to be satisfied
- What will it cost
- When does it need to be completed by





# INTRODUCTION PROPOSED CONNECTICUT RELEASE BASED PROGRAM

- <https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/Comprehensive-Evaluation-and-Transformation/Release-Based-Clean-Up-Program-Regulation-Development>



# THE RELEASE BASE CLEAN UP PROGRAM - HOW THIS MAY IMPACT OPEN SPACE AND CONSERVATION PROPERTIES



Identified Release (s) During Due Diligence - Mandatory Reporting Requirements

Filing fees with CTDEEP

Additional Investigation / Potential Remediation

# WHAT CONSTITUTES A RELEASE

## Connecticut General Statute 22a-134pp

(6) "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into or onto the land and waters of the state, not authorized under title 22a of the general statutes, of oil or petroleum or chemical liquids or solids, liquid or gaseous products or hazardous waste as defined in section 22a-448 of the general statutes. "Release" does not include automotive exhaust or the application of fertilizer or pesticides consistent with their labeling;



Picture Courtesy:  
<https://danielstraining.com/us-epa-region-7-fact-sheet-general-release-spill-reporting-requirements/>

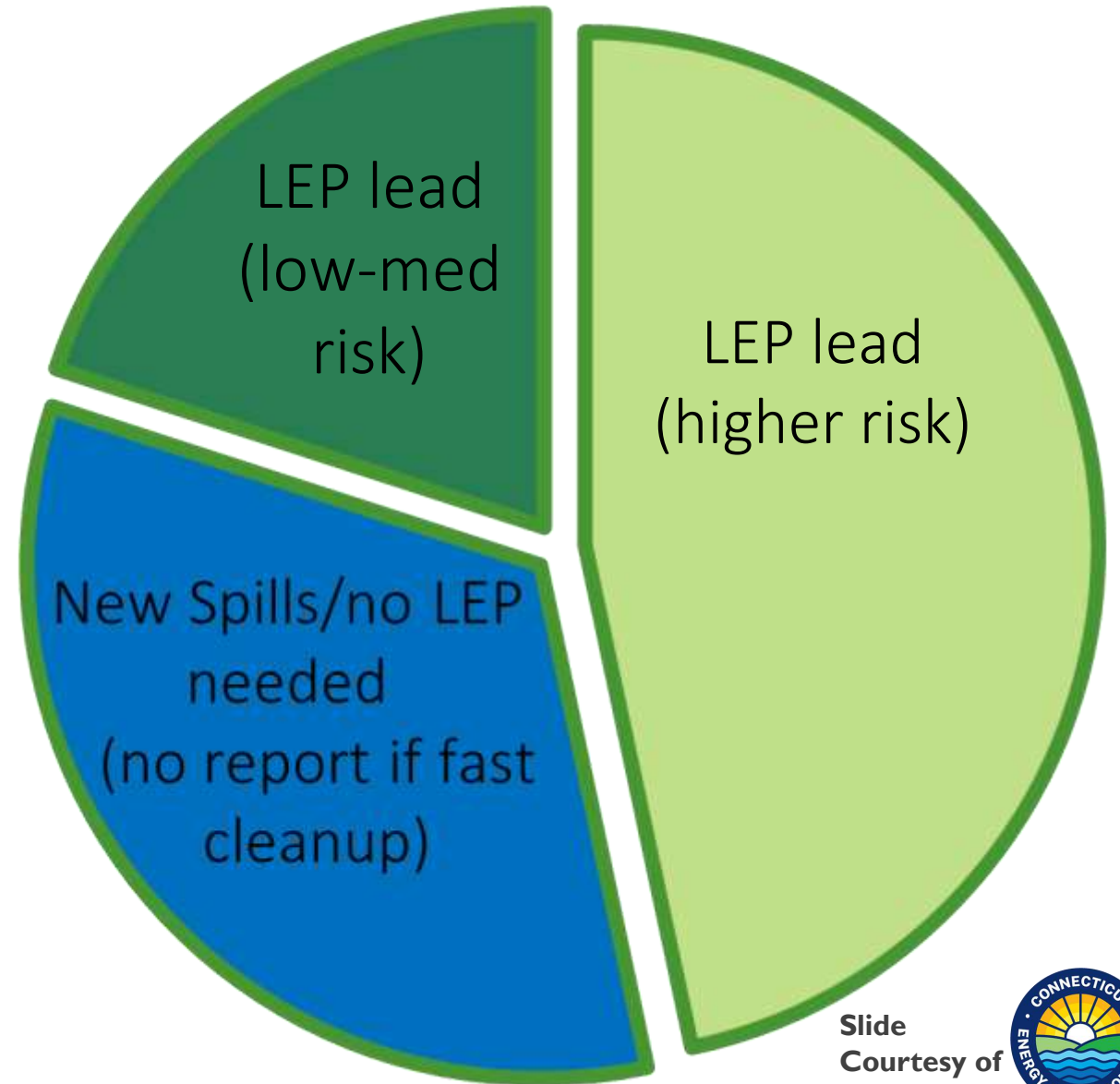
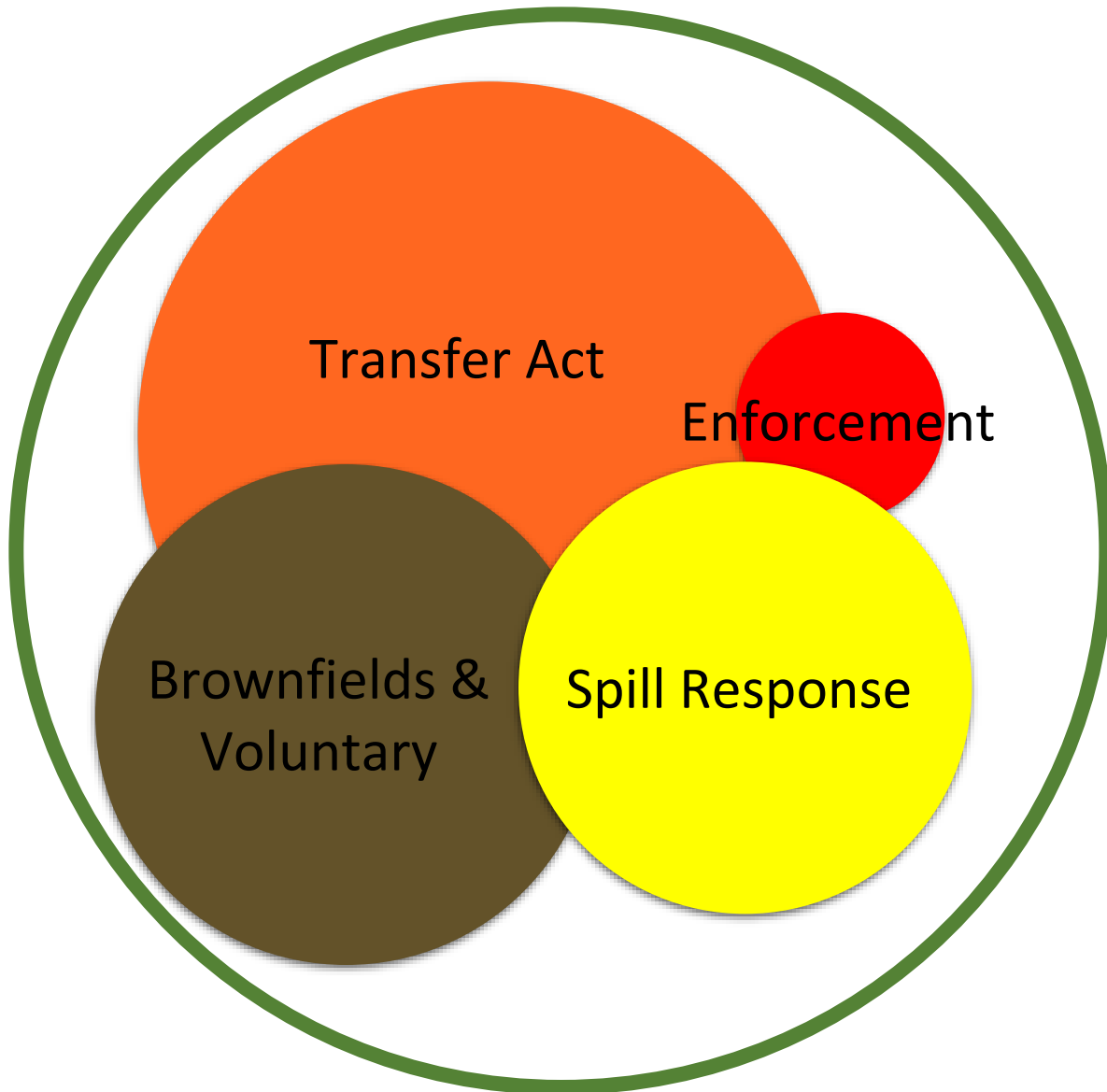


# WHAT MAY REQUIRE RELEASE REPORTING

- Discovery of an Existing Release
- Discovery of a Significant Existing Release
- Releases from Regulated Underground Storage Tanks (other regulations)
- Discovery of Emergent Reportable Release
- Multiple Lines of Evidence
- Maintainer of a Release



# SCOPE OF CLEANUP UNIVERSE – BEFORE AND AFTER



# HOW ARE THE RBCRS ORGANIZED?

- Sections fit into 4 general categories:

## First Year

- Discovery
- Reporting
- Characterization
- Immediate Action

## Longer Term

- Tiers

## Cleanup Standards

- General
- PEPs & Home Heating Fuel
- Soil
- Groundwater

## Administrative

- Verifications & Certifications
- Closure documents
- Audits

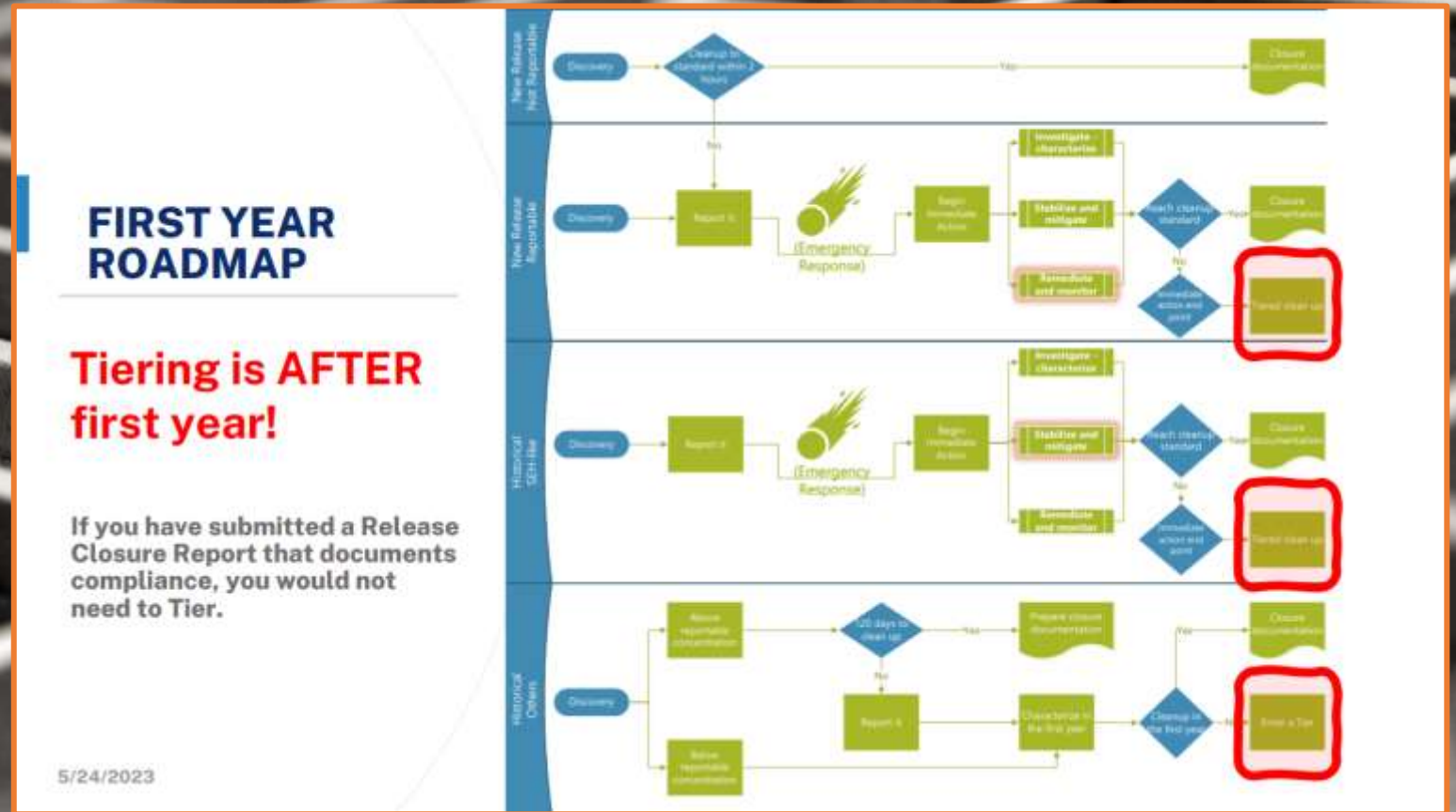
# DISCOVERY OF AN EXISTING RELEASE

Releases must be remediated if they are found during the investigation of piece of property, not an investigation of filing cabinets.



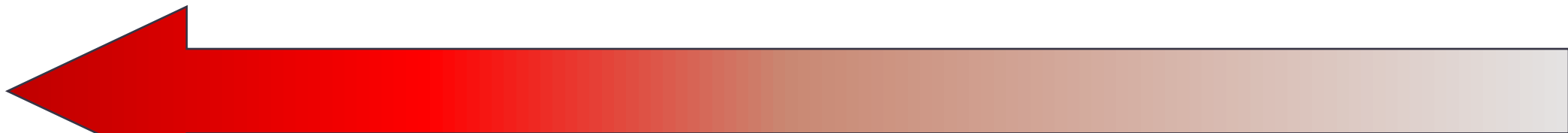
# RBCRs: RELEASE BASED CLEANUP REGULATIONS

- Navigating Regulatory Changes
- Discovery
- Reopening Closed sites
- Non-LEPs-PEPs
- Tiers Checklists
- Regulatory Milestones, More Costs
- Immediate Actions - Emergent Reported Releases



# TIERS CHECKLIST

Tier IA. DEEP Oversight	Tier IB. LEP Oversight Receptor Risk	Tier 2. LEP Oversight Controlled Risk	Tier 3. Monitoring Oversight
<p>Highest-risk releases. DEEP lead. FEWEST cases. Unknown risks to receptors; programmatic noncompliance. Complete closure or re-tier 2 years after Discovery.</p>	<p>Known risk to receptors (drinking water, vapor) must still be addressed or scoping/screening eco not completed RAP not completed Complete closure or re-tier 3 years after Discovery</p>	<p>Controlled risk, no receptor pathways Complete closure or re-tier 5 years after Discovery</p>	<p>Monitored Natural Attenuation (MNA) only Complete closure or reevaluate effectiveness of MNA 6 years after Discovery</p>



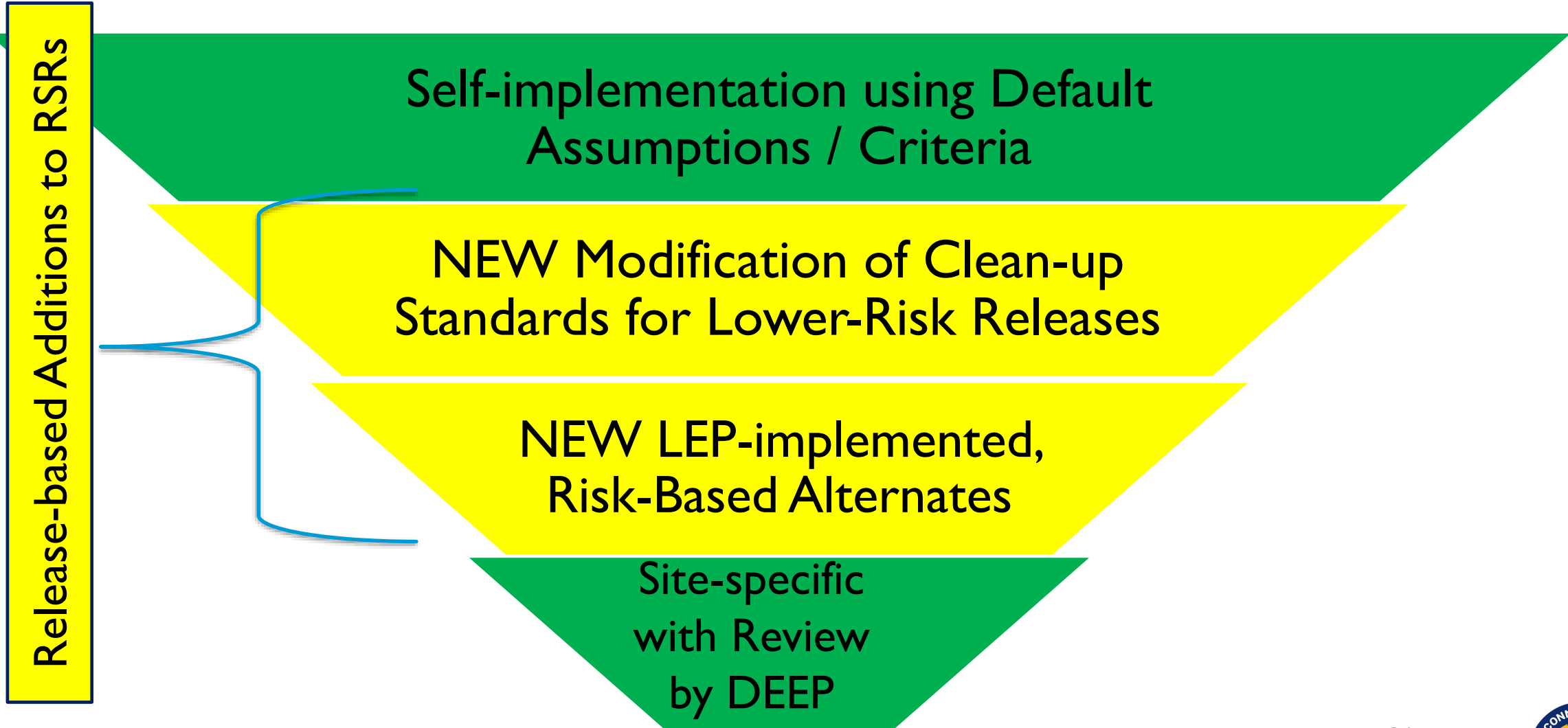
Increased Risk

# CONNECTICUT RELEASE-BASED FEE PROPOSAL

- **Fee at time of tiering**
  - Higher fees for more stringent tiers
- **Annual fees for releases yet to be closed**
  - Annual fee increases for each year tiered
  - Increased fees for missing deadlines
- **Fee Structure Benefits:**
  - **No** fees for quick remediation (<1 year)
  - Uncomplicated / easy to implement for DEEP and all parties
  - About half of Mass. fees

Tier	Annual Fees
Tier 1A	\$3,000
Tier 1B	\$1,500
Tier 2	\$1,000
Tier 3	\$500

# UPDATES TO CLEANUP REGULATIONS





# ADDITIONS TO THE SOIL CLEANUP STANDARDS

## DIRECT EXPOSURE CRITERIA

### ■ **Managed Multifamily Residential DEC**

- A release may qualify if the parcel has more than 4 residential units and the parcel and residential units are managed by an association or professional property management company
- Will require an EUR prohibiting the disturbance of soil by residents and active recreation without impervious cover

### ■ **Passive Recreation Residential DEC**

- Can be cleaned up to the passive recreation DEC if it is:
  - (1) subjected to an EUR or
  - (2) has a passive recreation conservation easement
- Examples of passive recreation include: hiking trails, bike paths, horse trails



# USE OF PERMITS BY RULE



## Historically Impacted Material

- **Applicability**
  - Industrial/commercial sites only with confirmed presence of historically impacted material
- **Notification**
  - A form prescribed by the Commissioner to notify the Department an owner is seeking cover under the permit by rule
- **Requirements**
  - Maintain Industrial/Commercial use
  - Cannot relocate historically impacted material parcel except as allowed by cleanup standards
  - Notify any new owner or interest holder of the permit by rule
  - Record an affidavit of facts on the land records
  - Submit a closure report
  - Conduct inspections every 5 years to demonstrate compliance

## Managing Soil Beneath Parking Lots, Roads and Buildings

Inaccessible soil at a release area is not required to be remediated to the direct exposure criteria if the soil is located beneath concrete or bituminous concrete used for parking or vehicle travel or below a building foundation.

- Similar administrative requirements as the historically impacted material permit by rule
- Submit document to Commissioner that verifies compliance,
- Record an affidavit of facts on the land records,
- Inspect every 5 years and report to the Commissioner on condition of concrete



## FROM THE LEPS

### ■ Benefits

- Same process as other states
- Primarily market driven due diligence and some enforcement
- No longer required to "prove the negative"
- Investigations will be more focused on identified risk
- New tools / more paths to closure
- Incentive to close out releases within a year or less
- Should remove Transfer Act "stigma" and improve economic development



# CRITICAL CONCEPT | WE GET IT | KEEPING THE DEALS GOING

## EDUCATING VESTED INTEREST

**What do we know about a site?**

**How much time to closing?**

**How can it be regulated?**

**What needs to be known?**

**Who pays for what?**

**"Negative Equity or Not?"**

**Escrow?**



# LOW HANGING FRUIT – THE FOREVER CHEMICALS

## PCBs

EPA TSCA

State Regulations

Paints and Caulks

Release to Soil

Building Materials

Mitigation and Remediation

## PFAS – So Many Uses

### So many uses

- Organic chemicals, plastics and synthetic fibers (OCPSF) manufacturers
- Metal finishing operations
- Dry Cleaners
- Car Washes
- Scrap metal recycling facilities, particularly those engaged in automobile recycling
- Electroplating facilities
- Electrics and electric components manufacturers
- Pulp and paper manufacturing
- Leather tanning and finishing operations
- Paint formulating operations
- Plastic molding and forming operations
- Textile mills
- Manufacturing facilities
- Fire Fighting Foams – Facilities/ Emergencies



Wear field clothing made of synthetic or 100% cotton, well washed without fabric softener

Use lab-provided sample containers, including HDPE or PP

Wear boots waterproofed with polyurethane and/or PVC, or PFAS-free over-boots

HDPE bags preferred, but Ziplok® also acceptable

Acceptable waterproof clothing is made with PVC, polyurethane, wax-coated fabrics, rubber, or neoprene

Use wet ice only; avoid blue ice or other ice substitutes

Avoid applying PCBs, including sunscreen\* and makeup, near sampling area

Wear only powderless nitrile gloves

No food or drink outside eating area. Wash hands thoroughly with soapy water after eating

Avoid PTFE (Teflon®), Sharpies®, Decon 90®

PVC: poly(vinyl chloride) PCBs: personal care products HDPE: high density polyethylene PP: polypropylene \*Ask for a list of acceptable sunscreens





# CT LAND CONSERVATION CONFERENCE

## BROWNFIELDS

**Presented by: Amanda Limacher, Brownfields Coordinator  
Bureau of Water Protection & Land Reuse**

# Ruins – Poems and Paintings of a Vanishing America

Chance: Suzanne  
Nothnagle

## CHANCE

He heard the smash of glass,  
saw the kid booking it,  
knew he wouldn't know  
what to say even if he caught him.

Too many years standing empty  
what was another broken window?

It would take big money  
to turn it into, what –  
low-income housing, offices?  
Most likely it was a tear down,  
trucks carting off  
bricks and beams  
filling another landfill  
until the empty lot  
inspired  
someone to take a chance.



Chestnut Street Mill - Norwich

Audette, Anna. Nothnagle, Suzanne. Ruins. Bunker Hill Publishing Inc., 2013.

# WHAT IS A BROWNFIELD?

- Any abandoned or underutilized site where redevelopment, reuse or expansion has not occurred due to the presence or potential presence of pollution in the buildings, soil or groundwater that requires investigation or remediation before or in conjunction with the redevelopment, reuse or expansion of the property.



Capehart Mill, Norwich



# BROWNFIELDS? IT'S ALL ABOUT PARTNERSHIPS AND COMMUNICATION!

Municipalities & Communities

DECD & DEEP

US EPA

Licensed Environmental Professionals

Developers & End Users



Mount Growmore - Bridgeport



Future Norton Park - Colchester



# ABC

## ABANDONED BROWNFIELD CLEANUP PROGRAM (CGS § 32-768)

Bona fide prospective purchasers	Must enter ABC prior to acquisition of property	Unused or significantly underused $\geq 5$ years	Redevelopment = regional or municipal benefit	Must investigate & remediate within site boundaries
Off-site investigation & remediation not required	Must eliminate off-site migration	No fee	Exempt from PTP (CGS § 22a-134)	Not responsible for causing the pollution
	Enroll in VRP (CGS § 22a-133x) - \$3,250 fee - Within 180 days of taking title	Liability relief from state and third parties	Eligible for a free Covenant Not to Sue (CGS § 22a-133aa)	



# BRRP

## BROWNFIELDS REMEDIATION AND REVITALIZATION PROGRAM (CGS § 32-769)

Bona fide prospective purchasers, innocent property owners, or contiguous landowners

Must enter BRRP prior to acquisition of property

- Innocent landowners can enter after taking title
- Municipalities are innocent landowners by statute

Must investigate & remediate within site boundaries

Off-site investigation & remediation not required

Must eliminate off-site migration

Fee = 5% of assessed land value

- Two installments: (180 days of title / <4 years of acceptance)

No fee for municipality – only for future owner

Exempt from PTP (CGS § 22a-134)

Not responsible for causing the pollution

Liability relief from state and third parties



# BRRP

## BROWNFIELDS REMEDIATION AND REVITALIZATION PROGRAM CONT. (CGS § 32-769)

- Meets the brownfield definition AND has had a release resulting in exceedance of RSRs
- No current enforcement actions
- Not on NPL or CT Superfund Priority List
- Not subject to RCRA Corrective Action

**Schedule**  
(180 days after 1<sup>st</sup> fee paid):

- ✓ Investigation complete
  - within 2 years
- ✓ Remediation initiated
  - within 3 years
- ✓ Remediation complete
  - Verification within 8 years



# MBLR

## MUNICIPAL BROWNFIELDS LIABILITY RELIEF PROGRAM (CGS § 22a-133ii)

Municipalities or development corporations

Not required to investigate or remediate - must be good stewards of the land

No fee

Must enter MBLR before acquisition of property

Liability relief from state and third parties

Exempt from PTP

(CGS § 22a-134)

Must submit plan & schedule to facilitate investigation, remediation, & redevelopment

Not for sites that the municipality will own permanently

Precursor to the BRRP, Voluntary, or ABC program



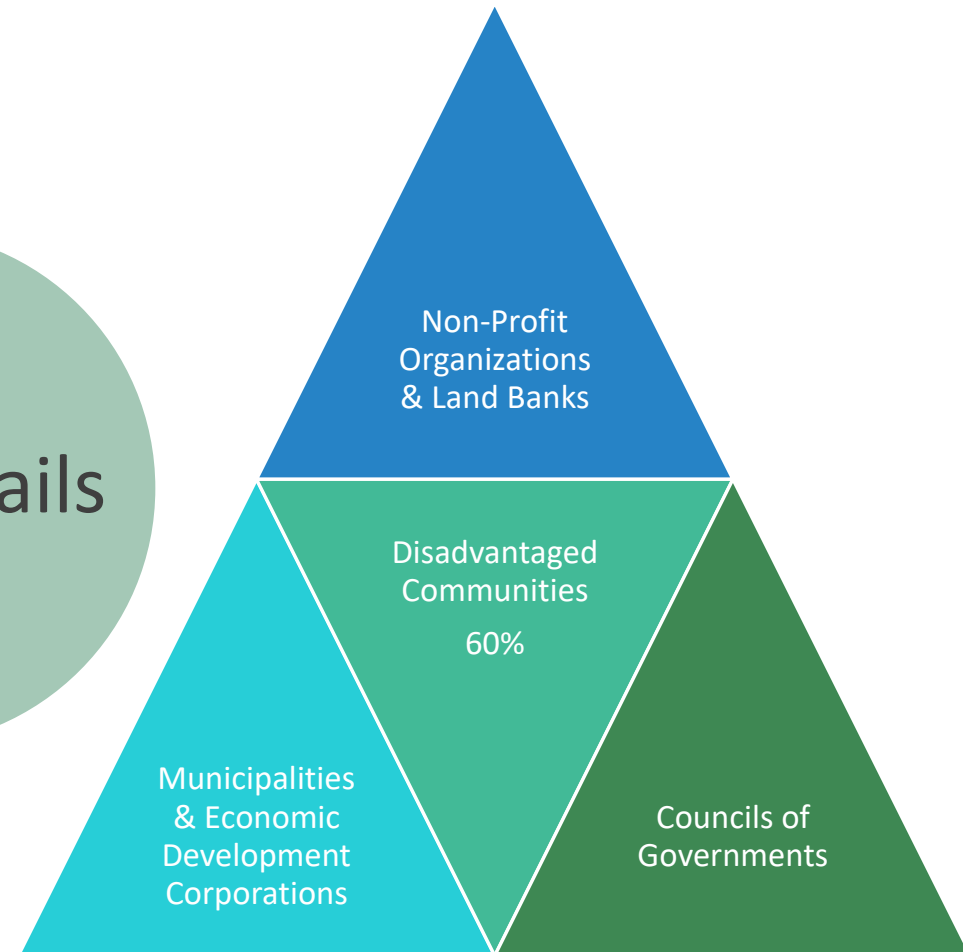
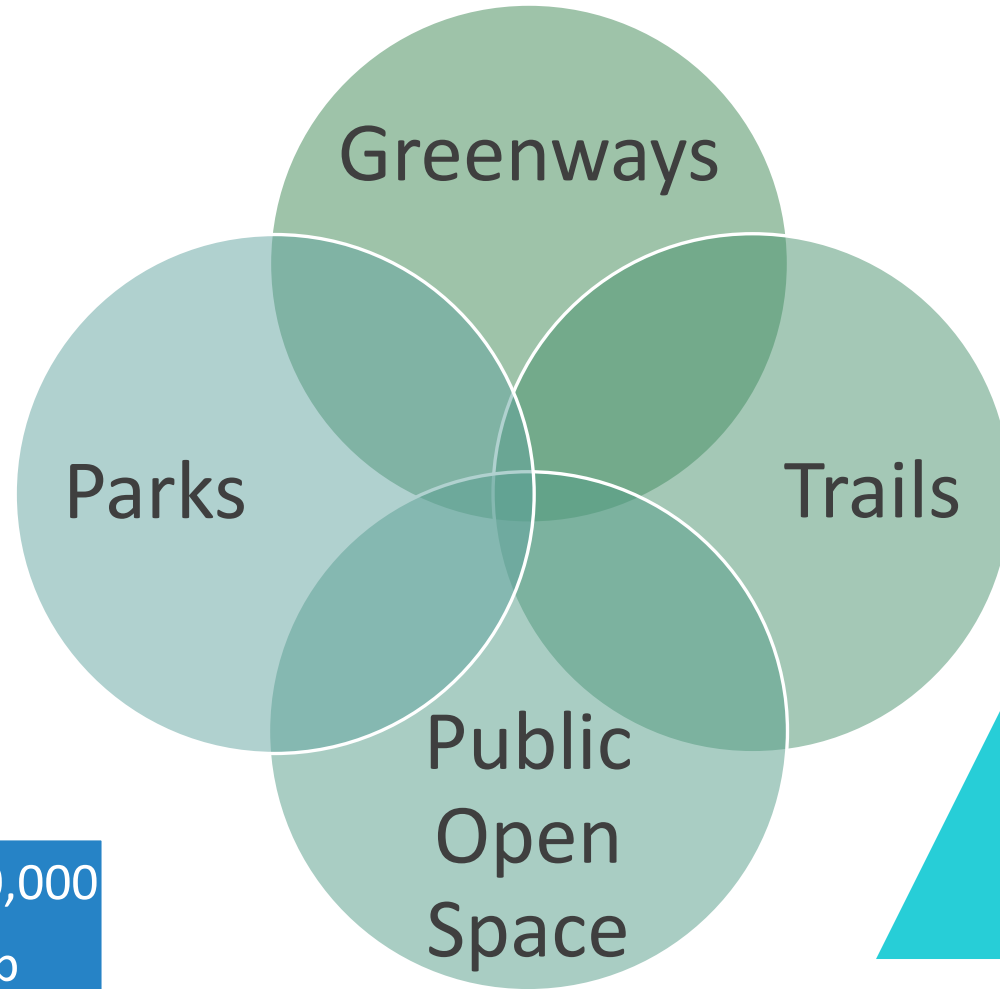
# VRP

## VOLUNTARY REMEDIATION PROGRAM

(CGS § 22a-133x)



# DEEP'S CERCLA 128(a) BROWNFIELDS GRANT



**\$750,000**  
BIL funds via EPA

Up to \$250,000  
Assessment

Up to \$250,000  
Cleanup



Round #2 Grant awards/Round #3 announcements expected Spring 2025

# RESOURCES

[Connecticut Brownfield Liability Relief Programs](#)

[Property Transfer Program](#)

[Voluntary Remediation Program](#)

[Brownfields Inventory](#)

[BIL Funding Updates and Announcements](#)

[DECD's Office of Brownfield Remediation and Development \(OBRD\)](#)



# Contact Information

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[CTDEEP Brownfields](#)





Cameron Beard,  
East Haddam Land Trust



East Haddam  
Land Trust

# CASE STUDY - HONEY HILL FARM EAST HADDAM LAND TRUST

eki environment  
& water



East Haddam  
Land Trust

Thank You!

Questions?

What Challenges Are You Facing – Ask Our Experts