

In Pursuit of Six Lakes Park: A Community's Fight for Environmental Justice in Hamden, Connecticut

“For decades, under-resourced residents of Southern Hamden have carried the dual burdens of environmental contamination and institutional neglect. Addressing the toxic legacy of Six Lakes and the harm inflicted on the Newhall neighborhood and surrounding communities requires that DEEP and Olin uphold both the letter and the spirit of the law and fulfill commitments to environmental justice and repair.”

Students at the Yale Environmental Justice Law and Advocacy Clinic worked with the Six Lakes Park Coalition (SLPC) throughout 2025 to dig deep into public records and accounts of the history of Six Lakes as well as the regulations, statutes, and policies at the federal and state level dictating the obligations of Olin Corporation, currently the owner of Six Lakes, and the Connecticut Department of Energy and Environmental Protection (DEEP), which is overseeing Olin’s testing and site cleanup. The result of the Yale law clinic’s efforts on behalf of SLPC is a 34-page white paper, *In Pursuit of Six Lakes Park: A Community’s Fight for Environmental Justice in Hamden, Connecticut*. Following is a summary of their findings.

Background

For nearly a century, the Winchester Repeating Arms Company and the Olin Corporation used the Six Lakes property to test weapons and dump industrial waste. In 1986, DEEP entered a legally binding agreement with Olin—a Consent Order—requiring Olin to investigate and clean up the contamination at Six Lakes, a 102.5-acre expanse of wetlands, forest, and glacial ponds in Southern Hamden. Forty years later, toxic substances remain throughout the site, preventing safe public access and compromising the health and welfare of its neighbors. Olin’s engagement with community stakeholders has been at best sporadic and mercurial, never translating into a meaningful dialogue or results on the ground.

Hamden’s Newhall neighborhood—a predominantly Black community built atop industrial fill next to the

The report *In Pursuit of Six Lakes Park* was prepared by the Yale Environmental Justice Law and Advocacy Clinic. Full copies are available at www.sixlakespark.org.

contaminated Six Lakes site—has borne outsized environmental burdens as a result of this contamination while being cut off from environmental benefits like safe outdoor greenspace. Since 2020, the Six Lakes Park Coalition has partnered with Newhall and neighboring communities to envision and realize a public-serving future for Six Lakes: a park that transforms a toxic legacy into a space for healing, beauty, community, and connection with nature for all who live near the property, as well as many who pass by each day on the adjacent Farmington Canal Heritage Trail.

Toward Community-Centered Cleanup

The Consent Order, last amended in 1987, requires that the Six Lakes site cleanup satisfy federal and state standards mandating timely and thorough investigation and community involvement. The community holds a right to meaningful participation throughout the remediation process. This right extends beyond receiving notice



and having an opportunity to comment at decision-making junctures. As the lead agency overseeing the remediation, DEEP is responsible for ensuring meaningful engagement of the interested public. It has a legal duty to:

- Conduct interviews with local officials, community residents, public interest groups, and other interested persons;
- Prepare and implement a formal Community Relations Plan, also known as a Community Involvement Plan, to ensure meaningful public involvement; and
- Provide at least one information repository near the site to keep the public up-to-date.

The Consent Order requires Olin to investigate and remediate the Six Lakes site following an established process.

As of October 2025, Olin is in the middle of completing its duty to issue a Remedial Investigation Study in the Consent Order. This must be completed before DEEP and Olin begin negotiating how to plan and execute the Six Lakes remediation itself.

- Olin will then prepare a Remedial Action Plan.
- Connecticut's Remediation Standard Regulations require public notice and a minimum 30-day

comment period before any proposed Remedial Action Plan can proceed.

- At its discretion, DEEP may also hold one or more public meetings to present information, answer questions, and receive input if there is significant public interest—as there is in Six Lakes.
- Within 30 days of DEEP approval of the Remedial Action Plan, Olin and DEEP must begin negotiating another consent order requiring its implementation.
- If more than three years lapse after the notice is published but before remediation substantially begins, or if substantial changes are made to the proposed approach, the regulations require reissuing of public notice and an additional comment period.

Federal and state requirements for public participation reflect a fundamental principle that **communities affected by hazardous waste have a right to shape the response to environmental threats in their own backyards**. Community-led remediation is not only a legal duty—it is a moral one. Today, Six Lakes is a monument to broken promises and environmental pollution. It must become a model of restorative justice and community-led repair. The time to reclaim Six Lakes for the Hamden community is now.

