



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: 03/08/2024
Name of Project/Action: Wall Street Place
Project Address(es): 61 Wall Street & 17 Isaacs Street, Norwalk, CT 06850
Affected Municipalities: Norwalk

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH FLEX: FX2410301, CHFA 4% LIHTC Equity: 23-409
Project Funding Source(s)/Program(s), if known: CHFA 4% LIHTC Equity, Tax-Exempt Bond to be issued by the Norwalk Housing Authority, DOH FLEX (State Rental Assistance Program (SRAP)), Other Private

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: The State Historic Preservation Office (SHPO) has reviewed 17 Issacs Street and commented as 'No historic properties will be affected' and for 61 Wall street was found to be listed in national register for historic places and can 'adversely effect' the historic district as a whole. SHPO suggested some mitigation measures for 61 wall street to resolve adverse effect.

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: Mithila Chakraborty, Ph.D., Environmental Analyst 1

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:

Wall Street Place, to be developed by JHM Group of Companies with support from the City of Norwalk, will restart a stalled development from 2015. The mixed-use project, which covers 2.08 total acres and two separate buildings, will include 151 new, mixed-income dwelling units and ground floor retail in the heart of the Wall Street neighborhood which once stood as a prominent downtown, central business district for Norwalk.

Description of the Proposed Action:

61 Wall Street was partial built before construction halted in 2015. This site will ultimately contain 101 rental units, 10,000+ square feet of retail and community space, and 40 surface-level parking spaces. 17 Isaacs Street was the site of a former movie theater that has since been demolished. 17 Isaacs will contain 50 rental units and 157 structured, parking spaces. All environmental concerns for both properties were addressed prior to each property being demolished. 61 Wall Street was demolished in the early-mid 2010's prior to the construction of the basement and podium. 17 Isaacs Street's was abated in late 2022 prior to demolition.

Alternatives Considered:

No Action Alternative.

Public concerns or controversy associated with the proposed action:

None.

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: Please Explain.
- Anticipated ownership upon project completion: N/A, State; Municipal, Private, Other: Please Explain.

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);
- 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 |
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| Effect on water quality, including surface water and groundwater; | <p>The proposed action will not result in any impact to groundwater and surface water quality.</p> <p>The general permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of 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.</p> <p>The total site disturbance, combining both projects, is approximately 2.3 acres. As stated, locally approvable construction projects between 1 and 5 acres of disturbance are not required to register with DEEP. They have approval from local land use agencies and will adhere to local E&S regulations. Therefore, submitting a SWPCP is not required. In practice, it is noted that the development team are providing water quality volume and peak control for the Wall Street Place East site by infiltrating roof runoff.</p> |
| Effect on a public water supply system; | <p>The project will not have any impact on public water supply system.</p> <p>DEEP commented on Watershed Management. The redevelopment is located west of the Norwalk River which is an impaired waterbody with a pollutant reduction analysis for bacteria (Total Maximum Daily Load) stated in the Norwalk Watershed Summary and a Watershed Based Plan. Due to the impairment, proper management measures for stormwater and sediment should be taken as to not further impact downstream surface waters, including Norwalk River.</p> <p>DOH requested the development team to follow the recommendations from DEEP. Viking Construction will make a Good Faith Effort and follow the Best Practices and recommendations of the Engineer of Record.</p> |
| Effect on flooding, in-stream flows, erosion or sedimentation; | The project site is not located in 100- or 500-year flood zone. |
| Disruption or alteration of an historic, archeological, cultural, or | The State Historic Preservation Office (SHPO) has reviewed both the sites. 17 Issacs Street has a letter of ‘No historic properties will |

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| 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; | be affected' and for 61 Wall street, it was found to be listed in national register for historic places and can 'adversely effect' the historic district as a whole. SHPO suggested some mitigation measures for 61 wall street after review. |
| 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; | The project is not located in any Natural Diversity Database area. According to DEEP too it was not in a Natural Diversity Database Area. So, this project will not have any effect on natural communities of critical habitat. There is no floodzone so the project will not affect any fish or aquatic animal. Wetlands will not be impacted through construction as described above. |
| Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment; | Based on the type and the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated. |
| Substantial aesthetic or visual effects; | The project is not expected to cause substantial aesthetic or visual impacts in the area. |
| 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 with Existing or Currently Planned Physical Infrastructure); Growth Management Principle #2 (Expand Housing Opportunities and Design Choices to Accommodate a variety of Household Types and Needs); and Growth Management Principle #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options). |
| 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; | Temporary disruption is expected during construction, but the long-term affect will be positive to the site and neighborhood. |
| Displacement or addition of substantial numbers of people; | No direct, indirect or cumulative impacts. |
| Substantial increase in congestion (traffic, recreational, other); | During work there can be some temporary traffic but best management practice can be adopted to reduce the impact. |

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| A substantial increase in the type or rate of energy use as a direct or indirect result of the action; | Some increase may occur as the building will be residential. |
| The creation of a hazard to human health or safety; | No impact anticipated. |
| Effect on air quality; | <p>During construction there can be a little air dust issue but no direct, indirect or cumulative impacts are anticipated from reuse work.</p> <p>DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.</p> <p>DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.</p> <p>DOH advised client to adopt best management practices including those from DEEP to reduce potential air quality impacts. Viking Construction has read and understands the DEEP requirements. They will make a Good Faith Effort to adhere to the recommendations above. Viking Construction understands the RCSA idling requirements and will post signs and amend their subcontracts to adhere to the recommendations above.</p> |
| Effect on ambient noise levels; | No noise issue is anticipated. |
| Effect on existing land resources and landscapes, including coastal and inland wetlands; | Not any adverse impact on coastal or inland wetland are anticipated. |
| Effect on agricultural resources; | Not any adverse impact on agricultural land is anticipated. |

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| Adequacy of existing or proposed utilities and infrastructure; | Existing utilities are present on site and in the area. |
| Effect on greenhouse gas emissions as a direct or indirect result of the action; | Not any adverse impact is anticipated. |
| Effect of a changing climate on the action, including any resiliency measures incorporated into the action; | Not any adverse impact is anticipated. |
| Any other substantial effects on natural, cultural, recreational, or scenic resources. | Not any adverse impact is anticipated. |
| Cumulative effects. | Positive cumulative impact increasing housing opportunity for people. |

PART V - List of Required Permits, Approvals and/or Certifications Identified at the Time of this Review

DEEP has made recommendations in their review letter dated September 6, 2023 (attached). On request of DOH, Developer/Consultant confirmed that all comments were considered.

(1) Stormwater Management during Construction: The total site disturbance, combining both projects, is approximately 2.3 acres. As stated, locally approvable construction projects between 1 and 5 acres of disturbance are not required to register with DEEP. They have approval from local land use agencies and will adhere to local E&S regulations. Therefore, submitting a SWPCP is not required. In practice, it is noted that the development team are providing water quality volume and peak control for the Wall Street Place East site by infiltrating roof runoff.

(2) Watershed Management: Viking Construction will make a Good Faith Effort and follow the Best Practices and recommendations of the Engineer of Record.

(3) Municipal Wastewater: DOH advised client to adopt best management practices including those from DEEP.

(4) Air Management: DOH advised client to adopt best management practices including those from DEEP to reduce potential air quality impacts. Viking Construction has read and understands the DEEP requirements. They will make a Good Faith Effort to adhere to the recommendations above. Viking Construction understands the RCSA idling requirements and will post signs and amend their sub contracts to adhere to the recommendations above.

PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DOH recommends that the project proceed as proposed and 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.