



# Determination of Environmental Significance Construction of New Parking Garage at 10 Clinton Street

Hartford, Connecticut  
March 8, 2018



**Prepared for:**  
Connecticut Department of  
Administrative Services  
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[portal.ct.gov/DAS](http://portal.ct.gov/DAS)

MMI #1266-46-01

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## RECORD OF ENVIRONMENTAL CONSIDERATION

This Documentation of Environmental Significance for Construction of a New Parking Garage at 10 Clinton Street in Hartford, Connecticut (Project) was prepared by Milone & MacBroom, Inc. under contract with the Connecticut Department of Administrative Services (DAS).

### Document Preparers:

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### Finding of No Significant Impact:

Based on the Initial Environmental Review of the Project contained herein and a review of comments received during the scoping process, the Connecticut DAS concludes that the Project does not rise to the level of significance.

As the Project has been adequately assessed and has been determined to not be environmentally significant, preparation of an EIE under CEPA is not necessary for the Project. However, should the project scope significantly change, an updated review will be conducted.

By my signature below, the analysis, comment responses, and conclusions herein have been accepted by DAS:

David Barkin, AIA  
Chief Architect  
Department of Administrative Services, Construction Services

### Distribution:

Connecticut Office of Policy & Management (via email)  
Connecticut Department of Energy & Environmental Protection (via email)  
Council on Environmental Quality (via submission for publication in the *Environmental Monitor*)  
City Clerk of Hartford, Connecticut (hardcopy)



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## 1.0 INITIAL ENVIRONMENTAL REVIEW

### 1.1 Introduction

This Initial Environmental Review (IER) has been prepared by Milone & MacBroom, Inc. (MMI) on behalf of the Connecticut Department of Administrative Services (DAS) Division of Construction Services (DCS). The IER has been conducted to determine obligations under the Connecticut Environmental Policy Act (CEPA).

This IER is intended to provide the DAS and the project team with baseline environmental information and to assist in determining what effects, if any, the proposed project/action may have on the environment. This review is conducted using readily available information and is based on qualitative assessments. The IER may be used to assess potential issues that may or may not require additional environmental review of study. **This IER, however, does not replace the obligation of the Architecture and Engineering Consultant(s) of the project team to continually assess what permits, certifications, or approvals the project may require as the project progresses or from submitting DCS’s Checklist for Permits, Certifications, and Approvals with each phase of the project.**

This is the first IER developed for this project location.

### 1.2 Project/Action and Site Information

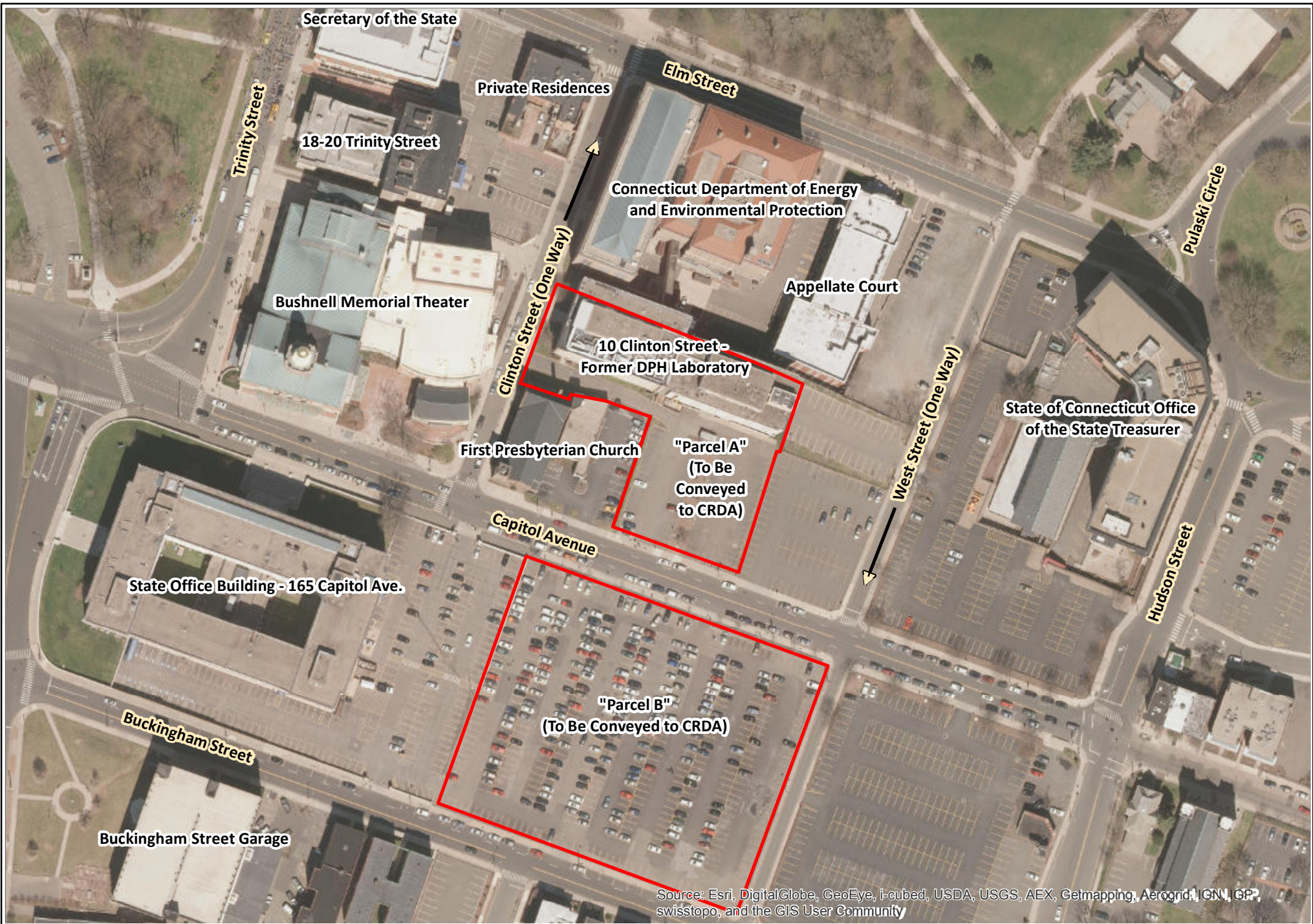
<b>Project Title:</b>	Construction of New Parking Garage at 10 Clinton Street
<b>DCS Project Number:</b>	BI-2B-441
<b>Project Address:</b>	10 Clinton Street, Hartford, CT
<b>Sponsoring Agency:</b>	Department of Administrative Services
<b>Agency Contact:</b>	David Barkin
<b>Participating Agency(ies):</b>	Connecticut Regional Development Authority
<b>DCS Project Manager:</b>	David Barkin

Connecticut DAS in conjunction with the Connecticut Regional Development Authority (CRDA) proposes to construct a new shared-use multi-story parking structure (Project). This Project is necessary in order to offset the projected loss of 350 surface parking spaces to CRDA for the purpose of housing or economic development that will occur consistent with Section 12 of Public Act 17-238. Spaces in the new garage will be allocated between state agencies and CRDA projects.

The preferred location for the parking structure is at 10 Clinton Street in Hartford at the location of the former Connecticut Department of Public Health (DPH) Laboratory (Project Area). The proposed parking structure would be four to six levels above grade and designed to facilitate a minimum of 400 additional vehicles over the 71 presently provided by existing surface parking. See Figure 1 for a location map of the Project Area (“Parcel A”).

The Project Area is a state-owned property that includes a currently vacant building (formerly a government use) and surface parking. Surrounding land uses include state agencies and other government uses, business/commercial, parks, residential apartments, and theater/entertainment. A site visit was conducted on February 21, 2018; a photo log of the Project Area is included in Appendix A.





SOURCE(S):  
2016 Aerial from ESRI



Figure 1: Existing Conditions Map

MXD: Y:\1266-46\Maps\Figure1.mxd

Construction of New Parking Garage at  
10 Clinton Street

LOCATION: Hartford, CT

Map By: scottb  
MMI#: 1266-46-01  
Original: 2/20/2018  
Revision: 2/28/2018  
Scale: 1 in = 200 ft

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The Project Area was selected as the preferred location for a new parking structure based on the results of a Technical Memorandum prepared by DESMAN Design Management dated September 27, 2017 that evaluated six potential parking garage sites. Per DESMAN, advantages of the 10 Clinton Street location include:

- Provides pedestrian and vehicular access to Capitol Avenue and Clinton Street.
- Convenient access for shared use options.
- Good location for State personnel and others.
- No site acquisition issues.
- Provides a developable site facing Capitol Avenue which can also be used for mobilization during construction.
- Occupies a site that previously was a building therefore minor loss of existing parking supply.
- Works well with existing grades.
- Averages 333 square feet per car efficiency.
- Potential development of retail component by CRDA.

Per DESMAN, disadvantages of the 10 Clinton Street location which will need to be further considered as part of design include:

- Building will require fire rated perimeter walls due to proximity to property lines requiring the garage to be sprinklered and mechanically ventilated.
- Access to the garage from Capitol Avenue is in the interior of the site and could create access issues in the future depending on development of the unused portion of the site.
- Limited grade area around the perimeter for snow removal.
- Four and a half levels above grade.

Demolition of the former DPH Laboratory will be required to facilitate this project. Per Section IV. b. of the Generic Environmental Classification Document for State Agencies (effective October 5, 2010), demolition of this structure (originally built circa 1964, addition in 1980) appears to not warrant a review under CEPA. According to DAS, the existing structure is not a historic, architectural, or archaeological resource. Nevertheless, DAS has coordinated with the State Historic Preservation Office (SHPO) regarding the demolition of this structure.

### **1.3 Project Purpose and Need**

The CRDA recently was the beneficiary of legislation which will have a significant effect on the availability of parking in the area. With the passage of Public Act 17-238, the following parcels are to be subdivided and turned over the CRDA (see Figure 1 for locations):

- Section 12(b)(1): A parcel of land (Parcel A) located at 10 Clinton Street subdivided into a 1.3 acre parcel with frontage on Clinton Street and Capitol Avenue, presently the site of the former Connecticut DPH Laboratory and surface parking by state agencies (71 spaces); and
- Section 12(b)(2): A parcel of land (Parcel B) located at 165 Capitol Avenue subdivided into a 2.7 acre parcel with frontage Capitol Avenue, West Street, and Buckingham Street presently used for surface parking by state agencies (350 spaces).

Conveyance of said parcels must occur within 90 days after the Commissioner of DAS determines that a sufficient number of replacement parking spaces (minimum of 300) have been secured at an alternate location. Per Section 12(c) of Public Act 17-238, the surface parking lot on Parcel B can no longer be used for parking purposes.

The total loss of surface parking spaces to CRDA as a result of Section 12 of Public Act 17-238 is 421 spaces (71 on Parcel A and 350 on Parcel B) which are presently used for state employee parking at various state agencies. At this time, CRDA is partnering with DAS to develop a parking garage on a portion of Parcel A (per Section 12 of Public Act 17-238) located at 10 Clinton Street. Development of a parking garage is a spatially-efficient means of replacing lost parking while replacing a vacant and unneeded outdated structure.

The proposed multi-use garage would include spaces dedicated to State employees as well as spaces dedicated for use by CRDA for housing and economic development purposes, which may include public parking spots. To comply with Section 12(c) of Public Act 17-238, the Commissioner of DAS has determined that the “sufficient” minimum number of parking spaces in the new garage is 350 spaces for state use per a recent planning study.

This determination was made in consideration of the ongoing reconstruction of the nearby Buckingham Street garage (309 Buckingham Street). The Buckingham Street garage was designed to provide a net increase of 193 spaces of parking in the area after accounting for a reduction of parking spaces (350 to 297, or a loss of 53 spaces) adjacent to Parcel B due to a layout redesign as evaluated in the Environmental Impact Evaluation (EIE) for the State Office Building Redevelopment at 165 Capitol Avenue.<sup>1</sup> The conveyance of parcels to CRDA results in the loss of 421 surface parking spaces, removing the buffer provided by the Buckingham Street garage and resulting in a deficit of 228 spaces in the area. The minimum 350 new spaces identified by the Commissioner of DAS will be sufficient to overcome this parking deficit and meet State employee needs, while providing additional spaces to meet CRDA needs, and while providing a suitable buffer for future use.

#### **1.4 State Conservation and Development Policies Plan**

The Project Area is located within a Priority Funding Area as designated in Connecticut's State Conservation and Development (C&D) Policies Plan. Priority Funding Areas are classified by census blocks that include one or more of the following criteria:

- Designation as an Urban Area or Urban Cluster in the 2010 Census
- Boundaries that intersect a ½-mile buffer surrounding existing or planned mass-transit stations
- Existing or planned sewer service from an adopted Wastewater Facility Plan
- Existing or planned water service from an adopted Public Drinking Water Supply Plan
- Local bus service provided 7 days a week

All five criteria are identified for the Priority Funding Area overlaying the Project Area. Areas immediately adjacent to the Project Area also have all five Priority Funding Area criteria. No conservation areas or rural lands are located within or immediately adjacent to the Project Area. Municipally protected lands (Bushnell Park) are located north of the Project Area on Elm Street. The

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<sup>1</sup> [http://www.ct.gov/ceq/lib/ceq/Final\\_SOB\\_EIE\\_BI\\_2B\\_381\\_04182017.pdf](http://www.ct.gov/ceq/lib/ceq/Final_SOB_EIE_BI_2B_381_04182017.pdf)

Project Area is surrounded by structures contributing to the Elm Street Historic District listed on the National Register of Historic Places, but is not identified as a structure that is part of the district.

In particular, the Project is consistent with the following Growth Management Principle:

- Growth Management Principle #1 – Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure

The Project is located in the regional center of Hartford, and the conveyance of parcels to CRDA under Public Act 17-238 in conjunction with the Project will help to redevelop and revitalize this section of Hartford. The proposed use of the Project Area is consistent with the current use of the district.

### 1.5 Potentially Impacted Resources

The vast majority of the Project Area is currently occupied with existing structures and paved parking lot areas. Border lawns and ornamental trees surround the building and parking areas. Table 1-1 presents a summary of resources proximal to the Project Area, along with an indication of the potential for impact. The potential for impact assumes that standard best management practices are employed during demolition and construction, such as sedimentation and erosion controls.

**TABLE 1-1**  
**Potentially Impacted Resources near the Project**

Resource	Potential Impacts		Comments
	Yes	No	
Aesthetic/Scenic Resources		X	Existing and future use will not be scenic resources. Project aesthetics will be consistent with surrounding land use to the extent practical. See also Historic Sites and Districts.
Air Quality		X	The proposed use will not generate significant air emissions.
Cultural Resources		X	The proposed 10 Clinton Street site is in an area of historical significance, however it is replacing a structure which does not have significant historical or architectural value.
Archeologically Sensitive Areas		X	The Project Area has been previously developed. There are no known archeological resources on the site.
Coastal Resources		X	The Project Area does not contain coastal resources.
Community Facilities or Services		X	Project is designed to meet an increased need for community facilities or services related to CRDA improvements.
Economy, Employment, and Income		X	The Project will allow state employees to continue to commute efficiently to work, providing an economic benefit. Spaces in the proposed garage will be used by CRDA for economic and housing purposes.
Environmental Justice		X	The Project will not displace any populations or housing.
Fish Habitats / Aquatic Habitat		X	The Project Area is not in close proximity to a stream or waterbody. Although the Park River runs close by through Bushnell Park, this section is underground and of limited habitat value. See also Stormwater Drainage / Water Quality.



**TABLE 1-1  
 Potentially Impacted Resources near the Project**

Resource	Potential Impacts		Comments
	Yes	No	
Floodplains / Floodways		X	The Project Area is not within a Federal Emergency Management Agency (FEMA) designated floodplain or FEMA designated floodway per the current Hartford County Flood Insurance Rate Map (FIRM) effective 9/16/2011.
Geology, Topography, and Soils; Agricultural Areas		X	Changes to geology are not proposed. Changes to topography are not proposed except where necessary for foundation footings and minor site grading. Agriculture is not performed within or adjacent to the Project Area.
Groundwater Resources		X	Aquifer protection areas and wells are not located within or near the Project Area.
Historic Sites and Districts	X		This site is directly adjacent to the Elm Street Historic District, which includes Presbyterian Church, the Bushnell Theater, the CT DEEP building, the Appellate Courthouse, and Treasury Office. The 10 Clinton Street Site, however, is not listed as a part of the historic district. Since the Project is replacing existing, non-historic buildings, and is of similar size to the buildings being replaced, negative impacts are not anticipated provided the façade of the garage is consistent with surrounding historic structures to the extent possible. Note that DAS has coordinated with SHPO regarding the demolition of the existing structure and will be performing improvements to nearby historic structures as a mitigation measure.
Land Use & Zoning		X	The Project is compatible with surrounding land uses. Local Zoning does not apply.
Noise and Light		X	The Project would require interior lighting to be available at night, but the use of directional lighting would prevent a significant increase in scattered light from the existing structure. Noise would mostly be limited to the sounds of cars moving at low speeds, primarily during business hours. This should not be disruptive to the local community.
Open Space and Recreation		X	The Project Area is currently developed and is not designated as future open space, nor does it support open space recreational use. The Project will support artistic recreational uses nearby the Project Area by providing parking which could be used to attend shows at the Bushnell and potentially for other nearby events.
Plants & Wildlife / Natural Diversity Data Base (NDDDB) Endangered, Threatened, and Special Concern Species		X	The Project Area is fully developed with minimal habitat value. There are no NDBB areas identified in the Project Area.
Public Health & Safety	X		Changes in traffic patterns are expected on roads nearby the Project Area. Traffic controls may be necessary to ensure safety of pedestrians. Other impacts to public health and safety from the Project are not anticipated.

**TABLE 1-1  
 Potentially Impacted Resources near the Project**

Resource	Potential Impacts		Comments
	Yes	No	
Solid & Hazardous Waste		X	The Project will result in temporary and minimal generation of solid and perhaps hazardous waste during construction, but not following construction.
State and Local Master Planning		X	Project is consistent with State (Priority Funding Area) planning. The Project is consistent with and compliments other land uses in the vicinity of the Project Area.
Stormwater Drainage / Water Quality		X	The amount of impervious surfaces in the Project Area would be consistent with existing conditions. Drainage will be installed in accordance with required regulations. Upper level runoff from the garage will be routed to the storm drainage or combined sewer, while interior levels which contain more concentrated runoff will be routed into the sanitary sewer system or combined sewer. Groundwater quality beneath the site is mapped as Class GB, and the proposed use will not impact that classification.
Transportation / Traffic, Parking, Circulation	X		Local vehicular traffic would increase on Clinton Street and circulation patters on other streets nearby the Project Area would be altered following completion of the Project. Analysis of the Project in relation to level of service for traffic at nearby interconnections will be necessary in order to ensure that adequate levels of service are maintained. The Project will eliminate the projected deficit of parking in the vicinity of the Project Area, provide parking for CRDA to use for housing and economic development, and provide parking complimentary to other nearby uses.
Utilities and Services		X	The district is currently served by all major utilities. Energy efficient lighting should provide a marked reduction in illumination energy on a proportional basis from the existing building. The site would require water access for fire protection, but would not be a large scale consumer of public water. As noted above, the site would require drainage hookups to both the sanitary and storm sewers, or combined sewer as available, to accommodate runoff generated from the structure.
Waterbodies / surface water		X	No waterbodies are located in or near the Project Area.
Wetlands		X	No wetlands are located in in or near the Project Area. The nearest wetlands may be located in Bushnell Park adjacent to Lily Pond and more than 300 feet away from the Project Area.

As noted in Table 1-1, potential impacts related to this project have been identified related to historic sites and districts, public health and safety, and traffic. The project team has been instructed to consider potential mitigation measures to these elements.

**1.6 Determination of Environmental Significance**

The environmental significance of the Project was determined based on the information in Section 1.4 and Section 1.5. The determination qualitatively assessed the potential level of significance of the Project taking into account the direct and indirect effect on the environment. The results of this determination are presented in Table 1-2.

**TABLE 1-2  
 Potential Level of Significance of Project on the Environment**

Potential or Actual Consequences	Potentially Significant with Mitigation	Not Significant with Mitigation	No Anticipated Significant Effects	Effects Undetermined at this Time
Impacts on air quality			X	
Impact on ambient noise levels			X	
Impact on public water supply system			X	
Serious effects on groundwater			X	
Serious effects on flooding			X	
Serious effects on erosion or sedimentation			X	
Effects on natural land resources and formations			X	
Effects on tidal wetlands or other coastal resources			X	
Effects on inland wetlands			X	
Effects on maintenance of in-stream flows			X	
Disruption or alteration of a historic, archeological, cultural, or recreational building, object, district, site or its surroundings		X		
Effects on natural communities and critical species of animal or plants and their habitats			X	
Interference with fish and wildlife movement			X	
Use of pesticides, toxic or hazardous materials or any such quantities as to create extensive detrimental environmental impact			X	
Substantial aesthetic or visual effects		X		
Inconsistency with written and/or mapped policies of the State Conservation and Development Policies Plan or other state plan			X	
Disruption or division of an established community or inconsistency with adopted municipal and regional plans.			X	

**TABLE 1-2  
 Potential Level of Significance of Project on the Environment**

Potential or Actual Consequences	Potentially Significant with Mitigation	Not Significant with Mitigation	No Anticipated Significant Effects	Effects Undetermined at this Time
Substantial increase in congestion (traffic, recreational, other)		X		
Substantial increase in the type or rate of energy use as a direct or indirect result of the action			X	
Create a hazard to human health or safety		X		
Any other substantial impact on natural, cultural, recreational or scenic resources			X	

Several of the potential or actual consequences identified in Table 1-2 are identified as being not sufficient with mitigation. Potential mitigation measures include designing a façade for the new parking structure consistent with surrounding structures, and completing a traffic and pedestrian safety study to identify potential mitigation measures to maintain or improve level of service at nearby intersections and ensure safe movement of pedestrians. The project team has been instructed to consider potential mitigation measures to these elements including conducting the necessary studies as part of project design.

Cumulative impacts are defined by the Regulations of Connecticut State Agencies (RCSA) 22a-1a-3(b) to be impacts on the environment which result from the incremental impact of the action when added to other past, present or reasonably foreseeable future actions to be undertaken by the sponsoring agency. These include the incremental effects of similar actions with similar environmental impacts and the incremental effects of a sequence of actions undertaken pursuant to an ongoing agency program which may have a significant environmental impact, whereas the individual component actions would not.

This project is similar to ongoing construction of the nearby parking garage at 309 Buckingham Street in Hartford, which was evaluated under CEPA as part of an EIE as noted above. The need for this Project was not foreseen at the time of the EIE and associated Record of Decision (ROD) in early 2017, as the Public Act was developed following submission of the ROD. Nevertheless, both projects have minimal impacts on the environment and individually as well as cumulatively.

Completion of this Project will ensure sufficient parking spaces are allotted for State employees while providing necessary spaces for CRDA and other public uses, while restoring a reasonable parking buffer for future needs in the area which may occur as part of the State of Connecticut’s long-term planning strategy aimed at reducing the quantity of leased office facilities for State employees and maximizing the utilization of State-owned properties. Reasonably foreseeable future actions by DAS do not include development of additional parking in the vicinity of the Project Area. Based on the above, cumulative impacts on the environment are not anticipated.



**1.7 Potential Environmental Permits, Certifications, or Approvals**

In the absence of detailed project information, such as a developed site layout, detailed plans, field verification of resources, etc., the following is a preliminary assessment of potential environmental permits, certifications, or approvals for the proposed project. This assessment does not replace or eliminate the Architecture and Engineering Consultant(s) obligation to identify and obtain any applicable permits, certifications, or approvals necessary as the project progresses.

**TABLE 1-3  
 Potential Environmental Permits, Certifications, or Approvals**

Agency and Permit Name	Potentially Applicable	Not Applicable	Undetermined at this time
<b>DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION</b>			
<b>Air Management</b>			
Title V Operating Permit		X	
New Source Review Permit		X	
Limit Potential to Emit From Major Stationary Sources of Air Pollution (Title V General Permit)		X	
<b>Radiation Division</b>			
X-Ray and Ionizing Radiation Source Registration		X	
<b>Water Protection and Land Reuse</b>			
Discharge of Domestic Sewage Permit (GP)		X	
Discharge of Food Preparation Establishment Wastewater (GP)	X		
Discharge of Groundwater Remediation Water Directly to Surface Water (GP)		X	
Discharge of Groundwater Remediation Water Directly to Sanitary Sewer (GP)		X	
Discharge of Hydrostatic Pressure Testing Wastewater (GP)		X	
Discharge of Minor Boiler Blowdown Wastewater (GP)		X	
Discharge of Minor Non-Contact Cooling and Heat Pump Water (GP)		X	
Discharge of Minor Photographic Processing Wastewater (GP)		X	
Discharge of Minor Printing and Publishing Wastewater (GP)		X	
Discharge of Minor Tumbling or Cleaning of Parts Wastewater (GP)		X	
Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater (GP)			X
Discharge of Stormwater and Dewatering Wastewater Associated with Construction Activities IGP)	X		
Discharge of Stormwater Associated with Commercial Activity (GP)		X	
Discharge of Stormwater Associated with Industrial Activity (GP)		X	
Discharge of Swimming Pool Wastewater From a Public Pool (GP)		X	
Discharge of Vehicle Maintenance Wastewater (GP)		X	
Discharge of Water Treatment Wastewater (GP)		X	

**TABLE 1-3  
 Potential Environmental Permits, Certifications, or Approvals**

Agency and Permit Name	Potentially Applicable	Not Applicable	Undetermined at this time
<b>Inland Water Resources</b>			
Inland Wetlands & Watercourses Permit		X	
Water Diversion Permit (Detention/Retention Ponds)		X	
Inland 401 Water Quality Certification		X	
Dam Construction Permit		X	
Flood Management Certification		X	
De/Retention Pond Review		X	
Authorization for Diversion of Water for Consumptive Use (GP)		X	
Dam Safely Repair and Alteration (GP)		X	
Water Resource Construction Activities (GP)		X	
Authorization for Diversion of Remediation Groundwater (GP)		X	
<b>Office of Long Island Sound Programs</b>			
Structures, Dredging & Filling Permit		X	
Tidal Wetlands Permit		X	
Coastal 401 Water Quality Certification		X	
Certificate of Permission (Short Permit Process)		X	
Consistency with the Coastal Management Act		X	
<b>Materials Management and Compliance Assurance</b>			
Wastewater Discharge: Ground Water Discharge Permit		X	
Wastewater Discharge: Surface Water Discharge Permit (NPDES)		X	
Wastewater Discharge: Pre-treatment Permit (Sewer Permit) for Discharges to Publicly Owned Treatment Works		X	
Hazardous Waste Treatment, Storage, & Disposal Facilities		X	
Solid Waste Facilities		X	
Connecticut General Statute (CGS) Section 22a-454 Waste Facility		X	
Special Waste or Asbestos Disposal Authorization		X	
Underground Storage Tank Registration		X	
Aerial Pesticide Application		X	
Aquatic Pesticide Application		X	
Contaminated Soil and/or Sediment Management (GP)			X
<b>Natural Diversity Database (Endangered Species) Review</b>			
NDDDB Review Request {endangered, threatened, and special concern species and habitats		X	
<b>STATE HISTORIC PRESERVATION OFFICE</b>			
Art in Public Spaces Program		X	
Impact to Cultural Resources (three part review: new construction site work/archeological, rehabilitation, and demolition)			X

**TABLE 1-3  
 Potential Environmental Permits, Certifications, or Approvals**

Agency and Permit Name	Potentially Applicable	Not Applicable	Undetermined at this time
<b>DEPARTMENT OF ADMINISTRATIVE SERVICES - CONSTRUCTION SERVICES</b>			
Acquisitions/Takings/Municipal Negotiations		X	
Easements		X	
Environmental Site Assessment Phase I	X		
Environmental Site Assessment Phase II, III, RAP	X		
Connecticut Environmental Policy Act	X		
National Environmental Policy Act		X	
Life Cycle Cost Analysis (LCCA)	X		
Transfer Act Site Assessment (TASA)		X	
Underground Storage Tanks			X
Hazardous Material inspection/Abatement Request (asbestos, lead, or indoor air quality)		X	
<b>DEPARTMENT OF TRANSPORTATION</b>			
Office of State Traffic Authority- Administrative Decision	X		
Office of State Traffic Authority- Major Traffic Generator Certificate			X
Encroachment Permit		X	
<b>U.S. ARMY CORPS OF ENGINEERS</b>			
Individual Permit (For new fill/excavation discharges greater than one acre)		X	
Programmatic General Permit *with review {5,000 square feet to 1 acre} *without review [less than 5.000 square feet)		X	
<b>U. S. ENVIRONMENTAL PROTECTION AGENCY</b>			
Sole Source Aquifer Review		X	



## 2.0 SCOPING AND RESPONSE TO PUBLIC COMMENTS

The Project meets Category IIc of the “Generic Environmental Compliance Document for State Agencies” effective October 5, 2010. Therefore, a notice of project scoping was published in the *Connecticut Environmental Monitor* on January 2, 2018. The notice also appeared in the January 16, 2018 edition of the *Monitor*. Appendix B contains documentation of notification. The scoping period closed on February 2, 2018.

A public scoping meeting was not requested nor held for this project. Written comments on the scoping notice were received from the following:

1. Connecticut Department of Energy and Environmental Protection (DEEP)
2. Connecticut DPH
3. Connecticut Office of Policy and Management (OPM)

Copies of all written comments are included in Appendix C. Responses to comments are addressed individually below.

### 2.1 Response to the Connecticut Department of Energy & Environmental Protection

CT DEEP provided written comments dated February 2, 2018 from Ms. Linda Brunza, Environmental Analyst. A summary of key points and responses follows.

1. Electric Vehicle Readiness: DEEP recommends that 10% of the garage parking spaces be ready to accept Level 2 electric vehicle charging stations, and that 5% of all parking spaces actually be equipped with Level 2 charging stations. DEEP further notes that Connecticut General Statute (CGS) 4a-67d(b) requires that all fleet vehicles purchased by the DAS be alternative fueled, hybrid electric, or plug-in electric. Additionally, the multi-state zero emission vehicle (ZEV) memorandum of understanding obligates Connecticut to place approximately 150,000 zero emission vehicles in use by 2025. The State also has committed to an 80% greenhouse gas reduction as compared to 2001 levels by 2050 with a midterm target of a 45% reduction by 2030, and a reduction in smog-forming motor vehicle pollution, in order to be in compliance with the Clean Air Act’s ozone standards. Therefore, to meet these targets Connecticut must continue efforts to support the transition to transportation electrification.

Response: The DAS supports the State of Connecticut’s commitment to being on the forefront of alternative energy use and environmental conservation. The Project will incorporate Level 2 charging stations in a minimum of 5% of parking spots, and will make a minimum 5% of additional parking spots ready to accept Level 2 charging stations in the future.

2. Clean Vehicles: DEEP recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that 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.



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.

Response: The DAS will require that any contractor involved in the project have equipment that meets all CARB standards for on and off road vehicles, or that the contractor can demonstrate its ability retrofit all equipment in its response to the request for proposals. In the latter case, certification of the retrofitting will be required prior to working on the site.

3. Idling: RCSA Section 22a-174-18(b)(3)(C) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

Response: Signs will be posted around the site reminding contractors of the provisions of RCSA 22a-174-18(b)(3)(C). Additionally, the head contractor will be required to ensure that any subcontractors and visitors to the site are aware of the laws.

4. Stormwater Management: Discharge from the top level of the garage may be discharged to a storm sewer system, while discharge from sheltered floors below must be discharged into an oil/water separator, preceding final discharge into a sanitary sewer system. An infiltration system must be installed which can infiltrate the top level runoff from a one inch rainfall event, before discharging into a storm sewer. If the garage is on a site with existing development that covers the site with over 40% impervious surface, the roof drainage system need only retain and infiltrate the runoff from the first ½ inch of rain.

If the garage discharges to a combined sewer system for which there are no plans to perform storm sewer separation work, these discharges are exempt from the DEEP stormwater permit program.

Response: Stormwater management at the site will be conducted in compliance with the DEEP stormwater discharge program. The availability of storm sewer, sanitary sewer, or combined sewer in the Project Area will be evaluated as part of the Project design. The type of system to be installed will depend upon the eventual discharge point.

## 2.2 Response to the Connecticut Department of Public Health

Connecticut DPH Drinking Water Section analyst Ms. Patricia Bisacky provided the following comment dated January 29, 2018:

1. Comment: The Drinking Water Section of the DPH has reviewed the above-mentioned project for potential impacts to any sources of public drinking water supply. This project does not appear to be in a public water supply source water area; therefore, the Drinking Water Section has no comments at this time.

Response: DAS thanks DPH for its review and comment regarding the Project.

### 2.3 Response to the Office of Policy and Management

The Office of Policy and Management provided written comments in a February 1, 2018 letter from Mr. Bruce Wittchen. A summary of key points and responses follows.

1. Comment: Based on DAS' experience with similar garages, what is the approximate annual cost to provide a parking space in such a facility, including all relevant capital and operational costs? King County, WA's Right Size Parking Calculator suggests that the costs can be substantial.

Response: It is well-established that the cost to provide garage parking is more expensive than to provide surface parking. Nevertheless, the advantage of using garage parking for the Project is the ability to provide more parking within a consolidated area than would be available as surface parking while making space for other desirable land uses.

The approximate annual cost to provide a parking space in a parking garage is estimated by DESMAN Associates to be \$450 (2018 dollars). This estimate assumes a pay on foot garage with one person staffing the facility. Note that some of the operational costs will be offset by public parking fees for nearby events.

2. Comment: Redevelopment, highway construction, and other activities might reduce the availability of parking near a number of state facilities in the coming years. Can DAS identify options that might enable the state to reduce the burden of providing alternate parking facilities, especially given uncertainties regarding future vehicle use and central office staffing? As OPM noted regarding the State Office Building project, a number of local, express and CTfastrak bus routes operate on nearby streets and Union Station is little more than a ¼ mile walk from the proposed garage. If the state is unable to take advantage of potential alternatives to providing parking, what are the key constraints?

Response: DAS recognizes the desire of OPM to encourage more State employees to utilize alternative modes of transportation, and that DAS will be a primary driver to implement State policy in this matter. However, DAS does not believe that the CEPA process is the appropriate place to analyze this broader issue which is outside of the purpose and need for the Project. If OPM believes that new policies are necessary to further encourage the use of alternative modes of transportation, such evaluation would extend far beyond the vicinity of the Project Area.

DAS has not identified another short-term, viable alternative to replace the loss of current parking areas envisioned under Public Act 17-238. Of particular concern to DAS is that the parking spaces being lost are in the vicinity of state-owned facilities planned for long-term use.

As stated in the 2017 ROD for the State Office Building project, the process by which DAS considers alternatives to reducing parking demands are typically through interagency coordination, internal

discussions between various units within DAS, such as Facilities Management, Communications, and Human Resources and by allowing employees to voice their issues or concerns with parking. DAS (among other agencies) has explored options (options which are outside of the purpose and need for the proposed action) in the past as to what could be done to incentivize employees to use alternative modes of transportation, and the discussion in the 2017 ROD for the State Office Building included a detailed discussion on how State employees are encouraged to utilize alternative transportation modes.

Nevertheless, as stated in the 2017 ROD, public transportation services may not be feasible for each employee on each workday, such that DAS must ensure that an appropriate number of spaces are coordinated with each State agency. In addition, specific to this Project, DAS must ensure that a sufficient number of spaces are included to meet CRDA needs for housing and economic development as well as providing a buffer of parking spaces for future state needs. Finally, as noted under DEEP comment #1, this project provides an opportunity to help meet transportation electrification needs.

In summary, this project is necessary to alleviate the parking deficit projected as a result of Public Act 17-238 in the vicinity of the Project Area. Please note that DAS is open to coordinating with OPM to determine feasible options for further encouragement of alternative modes of transportation for State employees outside of the CEPA process, which could include policy determinations by OPM for implementation by DAS.



### **3.0 SPONSORING AGENCY DECISION**

Based on the IER of the Project and a review of comments received during the scoping process, the Connecticut DAS concludes that the Project does not rise to the level of significance.

As the Project has been adequately assessed and has been determined to not be environmentally significant, preparation of an EIE under CEPA is not necessary for the Project. However, should the project scope significantly change, an updated review will be conducted.

environmental assessment review.docx





## APPENDIX A

### PHOTO LOG OF VICINITY OF PROJECT AREA

Pictures were taken February 21, 2018  
MMI #5993-02

Looking southwards up Clinton Street. DPH building second on left.

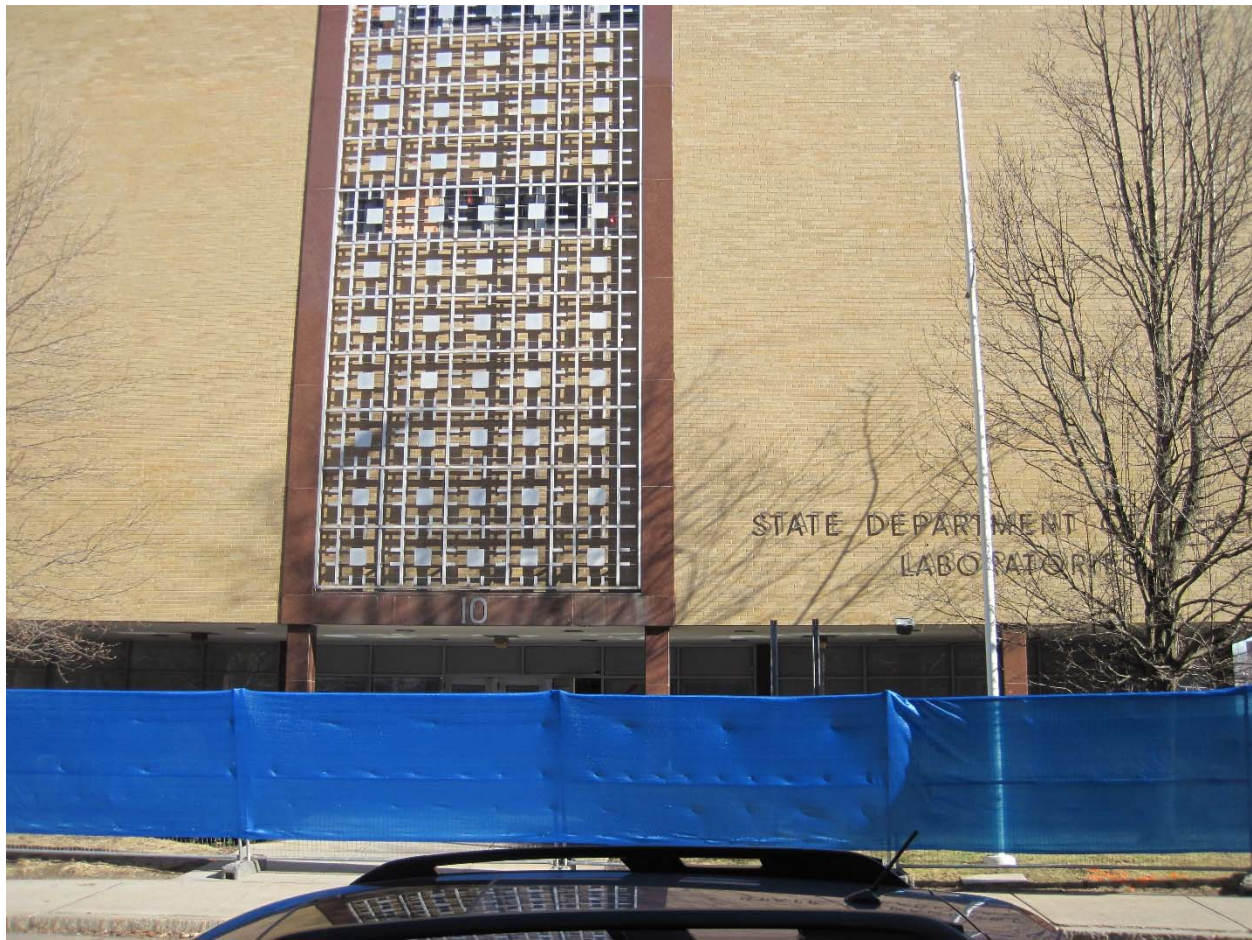


Looking eastward into alley between DEEP building and State Department of Health Laboratory





State Department of Health Laboratory- Looking east across Clinton Street



**Alley between the State Department of Public Health Laboratory and the Presbyterian Church**



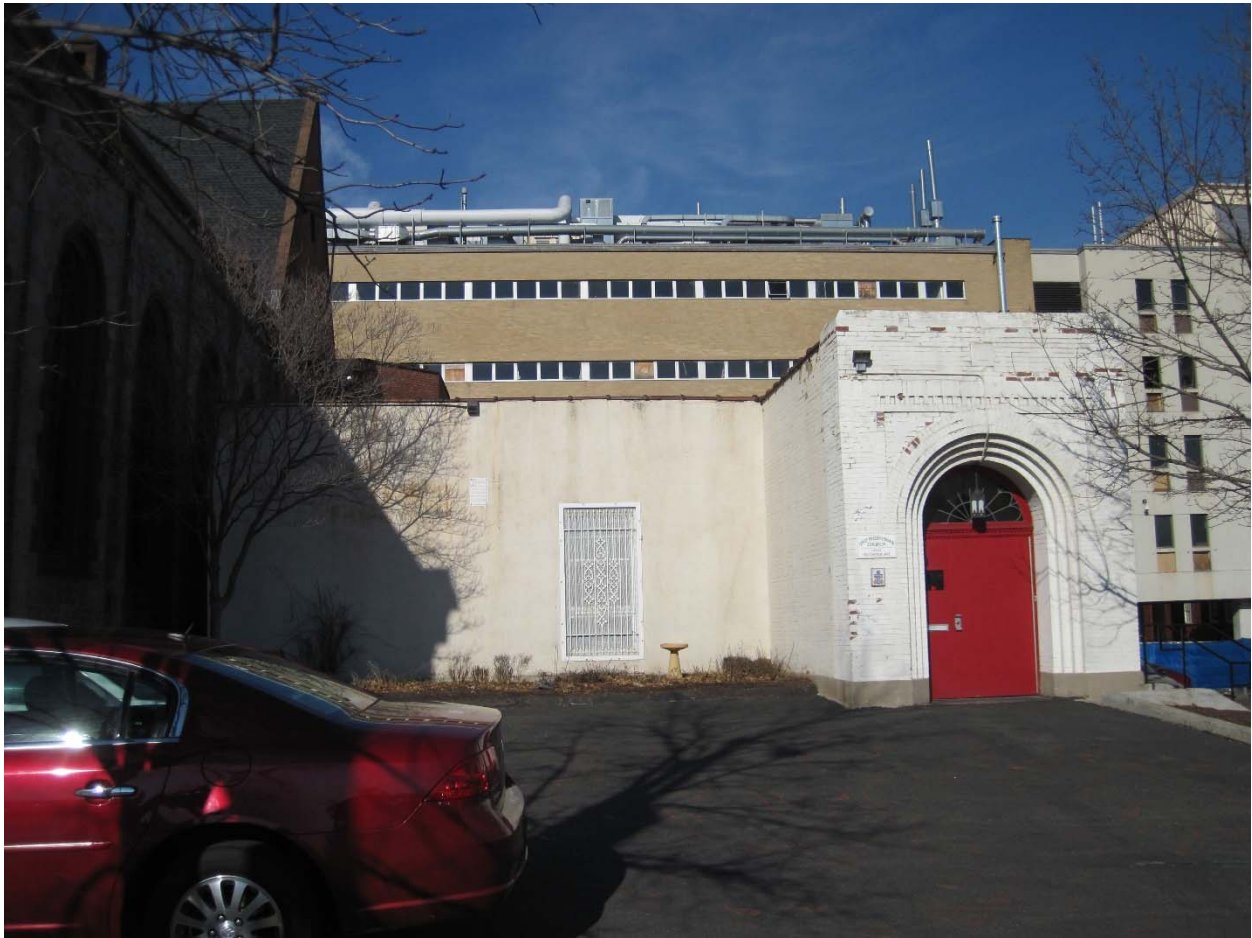


Looking eastward down Capitol Ave from corner of Clinton Street





Presbyterian Church Rectory- looking north from Capitol Ave



Rear of State Department of Public Health Laboratory- looking north from Capitol Ave



State Office Building (165 Capitol Avenue) parking lot, as seen from in front of the  
Presbyterian Church





Rear of Department of Public Health Laboratory- Looking west from West Street.



Rear of Department of Public Health Laboratory- Looking west towards former sub-building parking spaces



Corner of Washington Street and Buckingham Street, looking south. Site of future parking garage at 309 Buckingham Street.





Looking north from Buckingham Street across State Office Building parking lot towards the Department of Public Health Laboratory in background



Looking south from Elm Street, between the DEEP building and the Appellate Court House. Department of Public Health Laboratory building is located in the background.





## APPENDIX B

### SCOPING DOCUMENTATION



# COUNCIL ON ENVIRONMENTAL QUALITY

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Susan D. Merrow  
Chair

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- [How to Request a Public Scoping Meeting](#)
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**January 2, 2018**

### Scoping Notices

1. **NEW!** New Clinton St. Parking Structure, Hartford

### Post-Scoping Notices: Environmental Impact Evaluation (EIE) Not Required

1. Mulberry Point Water Main Extension, Guilford
2. Greater Waterbury - Naugatuck Valley Regional Industrial Park Expansion Project, Waterbury and Naugatuck

### Environmental Impact Evaluations

No Environmental Impact Evaluation has been submitted for review and comment.

### State Land Transfers

No proposed Land Transfer has been submitted for publication in this edition.

**The next edition of the Environmental Monitor will be published on January 16, 2018.**

**[Subscribe to e-alerts](#) to receive an e-mail when the Environmental Monitor is published.**

*Notices in the Environmental Monitor are written by the sponsoring agencies and are published unedited. Questions about the content of any notice should be directed to the sponsoring agency.*

## Scoping Notices

"Scoping" is for projects in the earliest stages of planning. At the scoping stage, detailed information on a project's design, alternatives, and environmental impacts does not yet exist. Sponsoring agencies are asking for comments from other agencies and from the public as to the scope of alternatives and environmental impacts that should be considered for further study. Send your comments to the contact person listed for the project by the date indicated.

**The Following Scoping Notice has been submitted for review and comment.**

### 1. Notice of Scoping for New Parking Structure

**Municipality where proposed project might be located:** Hartford

**Address of Possible Project Location:** 10 Clinton Street

**Project Description:** The Connecticut Department of Administrative Services in conjunction with Connecticut Regional Development Authority proposes to construct a new shared-use multi-story parking structure for regional development. Based on the results of a preliminary analysis, the preferred location for the parking structure is at 10 Clinton Street (the location of the former Connecticut Department of Public Health Laboratory), with possible alternate locations located at 129 Lafayette Street and at 100 Washington Street. The proposed parking structure at 10 Clinton Street would be four to six levels above grade and designed to facilitate a minimum of 400 additional vehicles over the 71 presently provided by existing surface parking.



This project is proposed in order to offset the projected loss of 350 surface parking spaces to the Capitol Region Development Authority for the purpose of housing or economic development that will occur consistent with Section 12 of Public Act 17-238.

**Project Map:** Click [here](#) to view a map of the project area. Click [here](#) to view two conceptual design alternatives for the parking structure at the preferred location, as well as conceptual alternatives for each alternate location.

**Written comments from the public are welcomed and will be accepted until the close of business on: February 2, 2018.**

**Any person can ask the sponsoring agency to hold a Public Scoping Meeting by sending such a request to the address below. If a meeting is requested by 25 or more individuals, or by an association that represents 25 or more members, the sponsoring agency shall schedule a Public Scoping Meeting. Such requests must be made by January 12, 2018.**

**Written comments and/or requests for a Public Scoping Meeting should be sent to:**

**Name:** David Barkin, AIA, Chief Architect  
**Agency:** Connecticut Department of Administrative Services  
 Division of Construction Services  
**Address:** 450 Columbus Boulevard, Suite 1301, Hartford CT 06103  
**E-Mail:** [david.barkin@ct.gov](mailto:david.barkin@ct.gov)

**If you have questions about a Public Scoping Meeting, or other questions about the scoping for this project, contact:**

**Name:** David Barkin, AIA, Chief Architect  
**Agency:** Connecticut Department of Administrative Services  
 Division of Construction Services  
**Address:** 450 Columbus Boulevard, Suite 1301, Hartford CT 06103  
**E-Mail:** [david.barkin@ct.gov](mailto:david.barkin@ct.gov)

## Post-Scoping Notices: Environmental Impact Evaluation Not Required

This category is required by the October 2010 revision of the [Generic Environmental Classification Document](#) for State Agencies. A notice is published here if the sponsoring agency, after publication of a scoping notice and consideration of comments received, has determined that an Environmental Impact Evaluation (EIE) does not need to be prepared for the proposed project.

**The following Post-Scoping Notices have been submitted for publication in this edition.**

### 1. Post-Scoping Notice for the Town of Guilford (Bittner Park) Mulberry Point Water Main Extension

**Municipality where project will be located:** Guilford

**CEPA Determination:** On September 20, 2016, the Department of Public Health (DPH) published a [Notice of Scoping](#) to solicit public comments for this project in the *Environmental Monitor*.

Based on the DPH's environmental assessment of this project which includes comments provided by the [Department of Energy and Environmental Protection \(DEEP\)](#) dated October 21, 2016, the [Office of Policy and Management \(OPM\)](#) dated October 21, 2017 and written [comments from the public](#) received between October 20, 2016 and October 23, 2016, it has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA. The Town of Guilford provided a [response to OPM](#) dated May 5, 2017 and revised on August 8, 2017 and [responded to the written comments submitted by the members of the public](#) in letters dated April 11, 2017. The DPH will coordinate with the Town of Guilford to ensure that the recommendations received during the Scoping period are implemented.

The agency's conclusion is documented in a [Memorandum of Findings and Determination](#) and an [Environmental Assessment Summary](#).

**If you have questions about the project, you can contact the agency at:**

Mr. Eric McPhee  
 Department of Public Health – Drinking Water Section  
 410 Capitol Avenue, MS #12DWS  
 PO Box 340308  
 Hartford, CT 06134-0308



## APPENDIX C

### COPIES OF WRITTEN COMMENTS RECEIVED



**To:** David Barkin, AIA, Chief Architect  
Connecticut Department of Administrative Services, 450 Columbus Boulevard, Suite 1301  
Hartford Ct

**From:** Linda Brunza- Environmental Analyst

**Telephone:** 860-424-3739

**Date:** 2/2/2018

**Email:** [Linda.Brunza@ct.gov](mailto:Linda.Brunza@ct.gov)

**Subject:** Scoping Notice for New Parking Structure, 10 Clinton Street, Hartford

---

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the Department of Administrative Services in conjunction with Connecticut Regional Development Authority for a new shared-use multi story parking structure for regional development. The preferred location is at 10 Clinton Street, the former Connecticut Department of Public Health Laboratory site. The proposed structure may be four to six levels above grade and provide a minimum of 400 additional parking spaces. Based on the information provided in the scoping notice, DEEP can offer the following comments for your consideration.

#### **Electric Vehicle Readiness**

DEEP recommends that 10% of all parking spaces in the project design be made ready to accept Level 2 electric vehicle charging stations and that half of these parking spaces actually be equipped with Level 2 electric vehicle charging stations. Pursuant to Conn. Gen. Stat. sec. 4a-67d(b), with limited exceptions, one hundred percent of light duty vehicles purchased or leased for the state fleet by DAS must be alternative-fueled, hybrid-electric or plug-in electric vehicles. State parking infrastructure must have the necessary charging equipment to support these vehicles. Additionally, Connecticut and seven other states are obligated, under the multi-state zero emission vehicle (ZEV) memorandum of understanding (MOU), to collectively put 3.3 million ZEVs on our roadways by 2025. Connecticut's share of this target is approximately 150,000 ZEVs. Connecticut is further committed to reduce greenhouse gas emissions by 80% below 2001 levels by 2050 (and a mid-term target of 45% below 2001 levels by 2030), and must also reduce smog-forming motor vehicle pollution in order to meet the federal Clean Air Act's health based ozone standards. To meet these targets, Connecticut must continue efforts to support the transition to transportation electrification by recommending the installation of electric vehicle (EV) charging infrastructure to support the growing EV market. EV sales in the US have increased more than 250% since 2012 and are projected to continue to increase. For more information please contact Lakiesha Christopher at 860-424-3189.

## **Clean Vehicles**

DEEP typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that 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.

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.

## **Idling**

Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

## **Stormwater management**

Parking garages where the roof parking level is exposed to rain must separate their drainage into two separate systems. Roof drainage is considered stormwater runoff and may be regulated under the DEEP stormwater discharge program. For new garages, roof drainage must discharge through a system that retains and infiltrates the runoff from the first inch of rain prior to any discharge to a storm sewer system or waters of the state. If the garage is on a site with existing development that covers the site with over 40% impervious surface, the roof drainage system need only retain and infiltrate the runoff from the first ½ inch of rain. Specific requirements for post-construction stormwater management can be found in the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities.

Drainage from the remaining interior levels of the garage must not discharge to a storm sewer system and must instead discharge to an oil/water separator that connects to a sanitary sewer system. These interior drains will mostly collect concentrated drippage from vehicles and, because it is undiluted by rain, will have much more concentrated levels of pollutants not appropriate for a storm sewer system.

If a garage discharges all drainage to a combined sewer system for which there are no plans to perform storm sewer separation work, these discharges are exempt from the DEEP stormwater permit program, which covers only discharges to surface waters and specifically exempts discharges to a sanitary or combined sewer.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ OPPD

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Drinking Water Section

January 29, 2018

Mr. David Barkin, AIA  
Chief Architect  
Department of Administrative Services  
Division of Construction Services  
450 Columbus Boulevard, Suite 1301  
Hartford, CT 06103

Re: Notice of Scoping for New Parking Structure, 10 Clinton Street, Hartford

Dear Mr. Barkin:

The Drinking Water Section of the Department of Public Health has reviewed the above-mentioned project for potential impacts to any sources of public drinking water supply. This project does not appear to be in a public water supply source water area; therefore, the Drinking Water Section has no comments at this time.

Sincerely,

A handwritten signature in black ink that reads "Patricia Bisacky".

Patricia Bisacky  
Environmental Analyst 3  
Drinking Water Section



Phone: (860) 509-7333 • Fax: (860) 509-7359  
410 Capitol Avenue, MS#12DWS, P.O. Box 340308  
Hartford, Connecticut 06134-0308  
[www.ct.gov/dph](http://www.ct.gov/dph)

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# STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT  
INTERGOVERNMENTAL POLICY DIVISION

February 1, 2018

David Barkin  
Department of Administrative Services  
Division of Construction Services  
450 Columbus Blvd, Suite 1301  
Hartford, CT 06103

Re: Notice of Scoping:  
New Parking Structure, 10 Clinton St, Hartford

Dear Mr. Barkin:

The Office of Policy and Management (OPM) has reviewed DAS' [Notice of Scoping](#) for the proposed 10 Clinton St parking garage and submits the following comments:

- Based on DAS' experience with similar garages, what is the approximate annual cost to provide a parking space in such a facility, including all relevant capital and operational costs? King County, WA's *Right Size Parking Calculator* suggests that the costs can be substantial (see [http://www.rightsizeparking.org/RSP\\_Parking\\_Rev\\_Cost\\_Memo.pdf](http://www.rightsizeparking.org/RSP_Parking_Rev_Cost_Memo.pdf)).
- Redevelopment, highway construction, and other activities might reduce the availability of parking near a number of state facilities in the coming years. Can DAS identify options that might enable the state to reduce the burden of providing alternate parking facilities, especially given uncertainties regarding future vehicle use and central office staffing? As OPM noted regarding the State Office Building project, a number of local, express and CTfastrak bus routes operate on nearby streets and Union Station is little more than a 1/4 mile walk from the proposed garage. If the state is unable to take advantage of potential alternatives to providing parking, what are the key constraints?

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:

A handwritten signature in blue ink, appearing to read "Bruce Wittchen".

Bruce Wittchen  
Office of Policy & Management  
450 Capitol Ave, MS# 54ORG  
Hartford, CT 06106  
(860) 418-6323  
[bruce.wittchen@ct.gov](mailto:bruce.wittchen@ct.gov)