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:	11/19/2024
Name of Project/Action:	Properties at 18-20 and 30 Trinity Street in Hartford
Project Address(es):	18-20 and 30 Trinity Street
Affected Municipalities:	Hartford
Sponsoring Agency(ies):	DAS
Agency Project Number, if applicable:	N/A
Project Funding Source(s)/Program(s), if known:	N/A

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: Conditional approval received by both SHPO and NPS.

☒ 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: Matthew Pafford, CTDAS Supervising Environmental Analyst

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:

These buildings are no longer needed for state use and will be transferred to a private entity for redevelopment.

Description of the Proposed Action:

The Department of Administrative Services (DAS) is proposing the sale and transfer of the subject properties to a private developer who will restore the existing historic buildings into a mixed-use redevelopment consisting of approximately 100 apartment units, ground floor restaurant/retail space, an outdoor plaza and amenities for residents including co-working office space, a fitness center, a yoga studio, and a community room and rooftop garden at 18-20 Trinity Street.

Apartment units will include a mix of studio, one-, and two-bedroom apartments consisting of 80% market rate and 20% affordable units restricted to those earning less than 60% of the area median income.

The proposal intends to utilize the properties' existing 67 surface parking spaces, and to seek additional parking capacity through a shared parking arrangement on nearby property owned by the Capital Region Development Authority (CRDA).

The proposed project was selected in response to a DAS-issued Request for Proposals (RFP) which sought to transfer the properties to a private developer interested in redeveloping the subject properties for their highest and best use, consistent with the City of Hartford and the State of Connecticut's economic development goals.

The subject properties are also identified in the Bushnell Park South Master Plan developed by the Capital Region Development Authority (CRDA) and the City of Hartford.

The properties were previously published in the Environmental Monitor as a State Land Transfer Notice on March 16, 2021, in accordance with Connecticut General Statutes Section 4b-47. No comments were received.

The project was scoping in the Environmental Monitor on July 19, 2022 with a public comment deadline of August 19, 2022. No public meeting was held and none was requested.

Alternatives Considered:

OPM solicited proposals from state agencies to reuse the properties but no agencies submitted proposals. DAS then offered to sell the properties to the City of Hartford, but the City declined. On March 2, 2021 OPM published a Land Transfer Notice in the Environmental Monitor to begin the process of transferring the property out of state ownership. No public comments were received. On April 16, 2021, DAS issued a Request for Proposal (RFP) for interested developers, and then the agency selected a preferred applicant based on criteria identified in the RFP.

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**
Effect on water quality, including surface water and groundwater;	No significant or adverse impacts to water quality. Groundwater is classified as GB and is not suitable for human consumption without treatment. The site is not located in an Aquifer Protection Area (APA). The nearest water bodies are the underground Park River and the Connecticut River to the east. Ground disturbance on the site will not exceed 1 acre and therefore a DEEP Construction General Permit is not required. An Erosion and Sedimentation that adheres to DEEP's latest guidelines will be prepared and implemented by the developer, as appropriate. The property and surrounding project area are heavily developed and rely on existing public utilities, including public water, storm and sanitary sewers. The proposed action seeks to redevelop the existing buildings and utilize the existing public infrastructure. MDC has confirmed water and sewer service availability for this project.
Effect on a public water supply system;	No significant or adverse impacts on public water supply. The project site is not located in an APA, and will use available existing public water connections, which MDC has confirmed are available for the proposed redevelopment.
Effect on flooding, in-stream flows, erosion or sedimentation;	No significant or adverse impacts resulting from flooding. According to available FEMA mapping, the project is not located within or adjacent to any flood prone area. No state or federal flood permitting is anticipated.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its	No significant or adverse impacts are anticipated. The proposed action will rehabilitate the existing buildings and property and put them back into productive use. The developer has received approval from the City of Hartford, and conditional approval from both the State Historic Preservation Office (SHPO) and the Federal National Park Service (NPS) and will adhere to the conditions of the agreement.

setting; OR B. Disruption of an archeological or sacred site;	
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;	No significant or adverse impacts to sensitive plants, animals, habitats. The site is fully developed and located in an urban area. No critical plant or animal species have been identified in the vicinity of this property. DEEP comments indicate the presence of known peregrine falcon nesting at other locations within the City and provided recommendations to reduce impacts if nesting sites are found in close proximity to the subject properties. See additional information in the Comments/Responses section.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	No significant or adverse impacts resulting from hazardous substances. Due to the intended use of the proposed development for mixed-use housing, the use of pesticides, toxic, or other hazardous materials or substances are not anticipated. Hazardous materials such as lead and asbestos, if present, will be remediated and disposed of accordingly during redevelopment.
Substantial aesthetic or visual effects;	No significant or adverse impacts to aesthetic or visual effects. The current properties are in generally good condition but are underutilized. The proposed redevelopment intends to rehabilitate the existing buildings and property back into productive use. The developer has received local approval and conditional state and federal historic approvals and will adhere to all requirements as applicable to ensure no loss of historic significance during the redevelopment.
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;	No significant or adverse impacts. The proposed development is generally consistent with the State C&D Plan, the CRCOG Regional Plan of Conservation and Development, the City of Hartford's 2035 Plan of Conservation and Development (POCD), and the Bushnell South Master Plan developed by CRDA in cooperation with the City of Hartford.
Disruption or division of an established community or inconsistency with adopted	No significant or adverse impacts.

municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	The subject properties are currently vacant or underutilized, and the proposed rehabilitation will provide additional housing opportunities in a prime location within Hartford. The project's location has sufficient existing infrastructure that is sufficient to accommodate the increase in new residents and associated activity. The proposed redevelopment is consistent with the goals of CRCOG's Regional Plan of Conservation and Development and the City of Hartford's 2035 Plan of Conservation and Development (POCD) to promote new housing within the city, especially affordable housing, that leverages infill opportunities in areas with established infrastructure.
Displacement or addition of substantial numbers of people;	No significant or adverse impacts. The proposed redevelopment will add approximately 100 new apartment units; however the site and surrounding area has adequate existing infrastructure, services, and amenities to accommodate the additional population and the associated increase in activity. The increase in population and activity resulting from this action are not expected to cause significant disruption to the existing neighborhood and its residents.
Substantial increase in congestion (traffic, recreational, other);	No significant or adverse impacts to congestion. Although the proposed project will add additional residents and an associated increase in pedestrian and vehicle traffic, the area includes adequate existing infrastructure, services, and amenities sufficient to accommodate this increased activity and no significant disruptions are anticipated as a result of this project. On-site parking is limited, so the developer has reached an agreement with CRDA to utilize up to 60 additional parking spaces at one of its nearby facilities. As part of the 2021 Bushnell South Study, CRDA committed to using its facilities to provide parking to support nearby housing and economic development projects in Hartford.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	No significant or adverse impacts to energy use. Energy use is likely to increase due to the increased occupancy and activities associated with the project's redevelopment into mixed-use apartments. However, adequate, existing infrastructure and energy supply exists to meet the energy needs of the project. Energy use will be consistent with similar development types. In addition, the Trinity Street apartments are being designed with all electric utilities; new, energy-efficient windows; and modern, energy-saving insulation throughout the buildings.

The creation of a hazard to human health or safety;	No significant or adverse impacts to human health or safety are anticipated.
Effect on air quality;	No significant or adverse impacts to air quality. Minor, temporary impacts due to dust, emissions, and other construction-related activities may occur during redevelopment. DEEP provided comments to assist in reducing impacts during construction. More long-term increases in emissions may result due to the intended new use of the buildings and higher activity levels. However, these increases will be commensurate with other, similar development types and will not result in significant impacts to air quality. The Trinity Street apartments are being designed with all new, all electric utilities; new, energy-efficient windows; and modern, energy-saving insulation throughout the buildings.
Effect on ambient noise levels;	No significant or adverse impacts to noise. Minor, temporary increases in noise levels are likely to occur during construction, but no significant or long-term impacts are anticipated. Post-construction, general noise levels of the redeveloped mixed-use facility will likely be higher than the current vacant/underutilized use but are expected to be commensurate with similar development types and are not expected to be significant or disruptive.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No significant or adverse impacts to land resources or landscapes. The site and surrounding area is fully developed and will remain unchanged after this redevelopment project. No off-site impacts are anticipated.
Effect on agricultural resources;	No significant or adverse impacts to agriculture. The site is comprised of urban fill, does not contain farmland soil, and is not used for agricultural activities.
Adequacy of existing or proposed utilities and infrastructure;	No significant or adverse impacts. The existing utilities and infrastructure have been confirmed to be available to accommodate the proposed development.

Effect on greenhouse gas emissions as a direct or indirect result of the action;	No significant or adverse impacts to greenhouse gas emissions. The project will not be a significant producer of greenhouse gases. After project completion, direct and indirect emissions associated with the new residential use of the building may be higher than those of the current vacant/underutilized building use but are not expected to be significant. To further reduce any emissions, the Trinity Street apartments are being designed with all new, all electric utilities; new, energy-efficient windows; and modern, energy-saving insulation throughout the buildings.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	No significant or adverse climate change impacts. The property is in a developed location in Hartford and is not at an elevated risk for flooding, coastal impacts, or other natural disasters.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	No significant or adverse impacts to natural, cultural, recreational, or scenic resources.
Cumulative effects.	No significant or adverse impacts are expected from this action. Although the proposed project will result in a general increase in activity in and around the property, the area is well-positioned to accommodate the increased activity and any associated impacts without a significant or negative impact on the surrounding community. It must be noted that redevelopment of the subject property is identified in the early phases of the Bushnell South Master Plan. While the larger Plan, if fully realized, would create significant change throughout this portion of the City, these impacts were identified and considered in the development of that Plan. It is expected that further identification and consideration of impacts will be ongoing as other aspects of the Plan are being considered for implementation.

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

The property owner/developer is responsible for securing all state and local permits, approvals, or certifications associated with the final development, including building permits, administrative zoning approval, National Park Service Part II approvals, etc. The State's action is limited to the transfer of the property to the developer.

PART VI – Sponsoring Agency Comments and Recommendations

Enter text.

PART VII - Public Comments and Sponsoring Agency Responses:

DAS received comments from the Department of Energy and Environmental Protection (DEEP). No other comments were received. A summary of DEEP comments, and DAS responses are as follows:

Solid Waste Disposal: DEEP indicated that all solid waste, including contaminated waste, should be handled in accordance with applicable statutes and regulations.

DAS Response: DAS is transferring the property to a developer. The developer will ultimately be responsible for conducting all work in compliance in with applicable state and federal statutes and regulations regarding removal and disposal of solid waste.

Special Waste: DEEP indicated that special waste, including asbestos, PCBs, lead, and other contaminants have special removal and disposal requirements. DEEP also recommended deconstructing and salvaging material as an environmentally friendly alternative to demolition.

DAS Response: The developer will retain a certified contractor with experience in the proper disposal of asbestos-containing materials (ACMs), PCBs, lead, and other contaminants as found in the structures. DAS is transferring the property to a developer who will be responsible for complying with all applicable state and federal statutes and regulations regarding the removal and disposal of special waste during construction.

Wildlife Division: The project location is not in an identified NDDB area, however the area is a known peregrine falcon nesting area. DEEP provided several recommendations for working nearby falcon nesting sites.

DAS Response: There are no known peregrine falcon nesting sites on the subject buildings or within the distances noted by DEEP. Should this occur, the developer will coordinate with DEEP to determine a reasonable course of action.

Stormwater General Permit: DEEP indicated that a General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable.

DAS Response: Stormwater General Permits generally apply to projects with ground disturbance greater than one (1) acre. The proposed project is for the redevelopment of an existing, fully-developed site so the need for a Permit is not anticipated. If the project does require a Permit, the developer will follow the appropriate steps and conduct all work in accordance with applicable state and federal statutes and regulations.

Air Management: DEEP recommended the use of newer vehicles and construction equipment, or older equipment retrofitted to reduce vehicle emissions, and to reduce unnecessary vehicle idling in compliance with state regulations.

DAS Response: The developer will conduct all work in compliance in with applicable state and federal statutes and regulations regarding engine idling and emissions.