



To: Mithila Chakraborty, Ph.D., Department of Housing  
From: Jordan DiDomenico  
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Date: 8/16/2024

Subject: Scoping Notice for The Elle at North Main

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The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for renovation and new construction to create a 49-unit multifamily development that will be called “The Elle”, located at 1244 North Main Street in West Hartford. The proposed project consists of partial adaptive reuse of the existing building on the site, and new construction. Only a portion of the existing building would be demolished, leaving a portion of the existing large meeting room to be re-used as the community room. Most of the development would be new construction of the residential units that would tie into the existing structure. To honor the building's past and bring new life to it, the entire facade will be preserved, including the color paneled windows. The new, single structure would largely be set back from the street and is limited to three stories to better integrate into its surroundings. A total of 49-units are proposed with a unit mix consisting of 24 one-bedroom units, 23 two-bedroom units and 2 three-bedroom units. Ten (10) units will be supportive housing units. The redevelopment will not increase the project site footprint.

The following comments are submitted in response to the scoping requirements of the [Connecticut Environmental Policy Act](#). As you know, scoping is the gathering and analysis of information that a state agency will use to establish the scope of environmental review of a proposed project. Scoping is done in the early planning stages of a project and DEEP is a commenting agency. Contact information is included as well as any necessary links to DEEP's webpages.

**1. Effect on water quality, including surface water and groundwater.**

*Melissa Mostowy, Water Planning and Management Division, [Melissa.Mostowy@ct.gov](mailto:Melissa.Mostowy@ct.gov):*

The entirety of the Town of West Hartford is within the Metropolitan District Commission's (MDC) service area, and it is unlikely that new sources for drinking water will need to be developed to serve the needs of the proposed project. Regardless of the public water supply availability, it is unlikely that the proposed demand will cause the system to exceed the usage of

50,000 gallons per day which is the jurisdictional threshold for the Water Planning and Management Division's "Diversion Program".

*Melissa Fahnestock, Water Planning and Management Division, [Melissa.Fahnestock@ct.gov](mailto:Melissa.Fahnestock@ct.gov):*

The proposed construction site is not located in an [Aquifer Protection Area](#) nor is it located in a parcel prioritized for source water protection as shown on the [Parcel Prioritization for Source Water Protection Viewer](#), indicating that the property is not in a surface water or groundwater protection area. However, the site is located in an area of coarse-grained deposits with a thickness of 50-100 feet per the [CT Surficial Aquifer Potential Map](#). Coarse-grained deposits of thickness greater than 50' are considered to have the greatest long term potential ground water yields and should be considered a future source area that should be protected. To ensure protection of this future groundwater source, it is recommended that the construction company implement Best Management Practices (BMPs) from the [Connecticut's Aquifer Protection Area Program Municipal Manual](#) entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas. This can be found in [Section 14.4.8 of the Appendices of the Municipal Manual](#).

*Emma Coffey, Water Planning and Management Division, [Emma.Coffey@ct.gov](mailto:Emma.Coffey@ct.gov):*

The North Branch Park River runs underground east of this proposed site at Simsbury Road and returns to the surface at the intersection of Wampanoag Drive and North Main Street. The North Branch Park River has a [Watershed Management Plan](#) (Plan), which is currently being updated. The Plan states "urban stormwater and combined sewer overflows (discharges of untreated wastewater directly to the river during larger storms when the combined storm and sanitary sewers become overwhelmed by stormwater runoff) are believed to be the primary sources of the bacteria contamination in the North Branch Park River." Under Goal B (Water Quality), "Objective B-2" states: "mitigate the negative impacts of stormwater runoff on hydrology and water quality through the use of Low Impact Development practices and Green Infrastructure approaches."

To reduce further impairment of the North Branch Park River, DEEP recommends incorporating the Plan's "Objective B-2" into this project via the use of Green Infrastructure and/or Low Impact Development (see Table 3-2 on page 21 of the Plan) throughout the development to reduce the impact of polluted stormwater from reaching receiving surface waters. To minimize the water quality impacts of the development, proper management measures for stormwater and sediment should be taken.

## **2. Effect on flooding, in-stream flows, erosion, or sedimentation.**

Not in a FEMA flood zone, no anticipated effects on flooding or erosion.

## **3. 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.**

*Robin Blum, NDDDB program, Wildlife Division, [robin.blum@ct.gov](mailto:robin.blum@ct.gov):*

This location is not in a Natural Diversity Data Base (NDDDB) area and does not require review for impacts to listed species. Please note that comments from the NDDDB Program are limited to plant and wildlife species that are listed as endangered, threatened, or special concern, and do not include non-listed plant and wildlife species.

**4. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment.**

*Ryan Mowrey, Remediation Division, [Ryan.Mowrey@ct.gov](mailto:Ryan.Mowrey@ct.gov):*

There are no remediation sites within 3,500 feet of the proposed project. There are no concerns from the Remediation Division.

**5. A substantial increase in the type or rate of energy use as a direct or indirect result of the action.**

No comments submitted at this time.

**6. Effect on air quality.**

No comments submitted at this time.

**7. Effect on existing land resources and landscapes, including coastal and inland wetlands.**

*Danielle Missell, Land and Water Resources Division, [Danielle.Missell@ct.gov](mailto:Danielle.Missell@ct.gov):*

There is no increase to the project site footprint. The aerial photograph does not show any existing wetlands or watercourses. No impacts to regulated resources are anticipated. No permits from the Land and Water Resources Division are required.

**8. Adequacy of existing or proposed utilities and infrastructure.**

No comments submitted at this time.

**9. Effect on greenhouse gas emissions as a direct or indirect result of the action.**

No comments submitted at this time.

**10. Effect of a changing climate on the action, including any resiliency measures incorporated into the action.**

No comments submitted at this time.

#### **11. Additional Comments/ Concerns:**

No comments submitted at this time.

#### **List of permits:**

##### **Federal Section 404 Clean Water Act, Water Quality Permit**

- Required for this project.
- May be required for this project. Contact the [Army Corps of Engineers](#) to determine jurisdiction.
- Not required.

##### **State 401 Water Quality Permit**

- Required (necessary for state approval when a Federal 404 is required)
- May be required, contact Land and Water Resources Division, or request a pre-application meeting.
- May be required, unable to state with information provided at this stage.
- Not required.

##### **General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP). Note: Without detailed plans, several options might be checked, please review these options to determine which is applicable for the project.**

- If between one and five acres of disturbance and approved at the local level, not required to register with DEEP.
- If five or more acres of disturbance and approved at the local level, must complete registration form and Stormwater Pollution Control Plan to DEEP at least 60 days prior to the initiation of construction. Registrations shall include a certification by the Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. For further information, contact the division at 860-424-3025 or [DEEP.StormwaterStaff@ct.gov](mailto:DEEP.StormwaterStaff@ct.gov)
- Projects exempt from local permitting (conducted by government authorities) disturbing over one acre must submit a registration form and Stormwater Pollution Control Plan to DEEP at least 60-90 days, as identified by the permit, prior to initiating construction.

The Construction Stormwater General Permit registrations must be filed electronically through [DEEP's ezFile Portal](#). Additional information can be found online at: [Construction Stormwater GP](#).

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: Eric Hammerling, Office Director, DEEP/ERSI