



To: Mithila Chakraborty, Ph.D.
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Date: 11/7/2025

Subject: Scoping for Bacon Congregate

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for Bacon Congregate. The proposed address of the project is 43 Morris Street, Hartford, CT. This development effort proposes the modernization of Bacon Congregate, an adaptively converted former bottling factory, built circa 1920 into apartments for the elderly in 1984. The project contains 20 efficiency and 3 one-bedroom dwelling units as well as a super's apartment in an approximately 20,000 sf four story masonry structure with two elevators on 0.685 acres. The project scope of work includes a moderate renovation primarily to dwelling unit and common area interior elements, including new kitchens and bathrooms, common area hallways, offices and meeting/dining spaces, paving and sidewalk replacement/repair with no changes to impervious surface, new windows and masonry repointing. No demolition is contemplated.

The following comments are submitted in response to the scoping requirements of the [Connecticut Environmental Policy Act](#). 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

The proposed project is located within The Metropolitan District Commission's (MDC) service area, so public water supply will be available for the development site if needed. Otherwise, it is unlikely that the site will require more than 50,000 gallons of water per day, the jurisdictional threshold of the Water Diversion Program, so no new sources will need to be developed.

Melissa Fahnestock, Water Planning and Management Division, Melissa.Fahnestock@ct.gov

The proposed construction site is not located in an [Aquifer Protection Area](#) or a parcel prioritized for source water protection as shown on the [Parcel Prioritization for Source Water Protection](#)

[Viewer](#). The site is located in an area of glacial meltwater deposits as shown on the [CT Surficial Aquifer Potential Map](#), but these fine-grained deposits have a low potential yield. This area is not a current source and is not a likely future source for groundwater. There are no concerns related to the Aquifer Protection Area Program.

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

Darcy Winther, Land and Water Resources Division, Darcy.Winther@ct.gov

Flood Management Certification: If proposed activities are being funded or conducted by a state agency AND are being conducted within a FEMA designated floodplain, the applicant should consult with the DEEP's Land and Water Resources Division for information on how to comply with the States Flood Management Statutes and Regulations. For information on identifying if the site is in a flood zone, please see FEMA's website: [FEMA Flood Map Service Center](#). For information on Flood Management Certification, please see DEEP's website: [Flood Management Certification Fact Sheet](#).

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.

Shalyn Zappulla, Fisheries Division, Shalyn.Zappulla@ct.gov

If appropriate, the use of pervious surfaces for sidewalks is encouraged.

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

Allison Forrest-Laiuppa, ERSPD, Allison.Forrest-Laiuppa@ct.gov

While this address is not listed in the PCB Program database, due to the age of the buildings, there is a potential that building materials may be PCB-impacted. While testing of building materials is not a requirement under the regulations, it is suggested to ensure that whatever material is removed and disposed of during renovations is handled properly.

Thalia Singh, Remediation, Thalia.Singh@ct.gov

In the absence of prior environmental data, it is reasonable to assume that historic urban fill may be present beneath portions of the site. The nature and extent of fill materials remain unknown. Therefore, any disturbance of the soil during redevelopment warrants a thorough soil characterization.

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.

No comments submitted at this time.

8. Adequacy of existing or proposed utilities and infrastructure.

Ivonne Hall, Water Planning & Management Division, Ivonne.Hall@ct.gov

Bacon Congregate is likely located in a combined sewer area. Any new connection or an existing connection from the site which will increase flows to the combined sewer (due to redevelopment) will require approval from the MDC. The project planners/designers should request MDC's guidelines to determine the availability and capacity of the combined sewer in that area. With other redevelopment projects, the Department understands that MDC has authorized connections of domestic wastewater (i.e. sewage) but has had concerns related to the acceptance of new or increased discharges of stormwater from a redeveloped property. DEEP recommends that discussions with the MDC related to the management of the domestic sewage and stormwater discharges from the redeveloped site begin early in the planning and design process. Additionally, the Department recommends that the redevelopment design consider an onsite stormwater management system to meet applicable [state stormwater permits](#) (see stormwater section below for more information) and in lieu of connection into a combined sewer system the evaluation of the installation of a new and dedicated storm drain that connects to an existing, separate storm sewer system with the City or that discharges directly to a watercourse. If it is infeasible to manage the redeveloped site's stormwater discharge separate from the combined sewer system, the project planners/designers should coordinate with MDC and discuss strategies to mitigate the impacts of new or increased flows due to development within the combined sewer system. Such strategies may include controlling post-development total stormwater runoff volumes and peak discharge rates to at least pre-development discharge rates and corresponding total runoff volumes, and/or offsetting the new or increased flows from redevelopment by reducing flows into the combined sewer system at other sites within the same sewer-shed. The Department notes that in other combined sewer system areas, when flow offsets are used as a mitigation strategy, a ratio of at 4:1 of offset has been used in the past.

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 additional comments/concerns submitted at this time.

List of permits:

Federal Section 404 Clean Water Act, Inland, Water Quality Certification (WQC)

☐ Required for this project.

☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. Wetlands and Watercourses should be clearly field delineated by a qualified soil scientist. If work is being proposed in a wetland or watercourse (crossings, fill, structures, culverts etc.), contact the [Army Corps of Engineers](#) to determine if it is within their jurisdiction.

☐ Not required.

State 401 Water Quality Permit

☐ Required. (if a federal 404 WQC is required, a state 401 is also required because the programs are tied together)

☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. For a pre-application meeting, contact: Darcy.Winther@ct.gov

☐ 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

☐ 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