



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: 8/28/2026
Name of Project/Action: Bacon Congregate
Project Address(es): 43 Morris Street, Hartford, CT 06105
Affected Municipalities: Hartford

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH22-0280-064
Project Funding Source(s)/Program(s), if known: State fund

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: No Adverse Effect to historic resources letter is available.

☒ Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency's responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).

Completed by: Mithila Chakraborty, Ph.D., Environmental Analyst II

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:

This development effort proposes the modernization of Bacon Congregate, an adaptively converted former bottling factory, built circa 1920, into apartments for the frail elderly in 1984.

Description of the Proposed Action:

This 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 scope of work proposed is 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.

Alternatives Considered:

No Action Alternative.

Public concerns or controversy associated with the proposed action:

NA

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;	The proposed action will not result in any impact on groundwater and surface water quality. There are no concerns related to the Aquifer Protection Area. Water Planning and Management Division, DEEP, commented: “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.” “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.” On request of DOH, Development team confirmed: “The existing facility uses between 60 and 90 CCF of water per month (CCF = 748 gallons) which is between 44,880 gallons and 67,320 gallons per month. Renovation will include water saving devices, such as low flow toilets, showerheads and faucets which is expected to reduce use. As noted, the facility is using (and will use) a fraction of the 50,000 gallon per day threshold.”
Effect on a public water supply system;	The project will not have any negative impact on the public water supply system.
Effect on flooding, in-stream flows, erosion or sedimentation;	No direct, indirect, or cumulative impacts as the location is not in any flood zone.
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	As per SHPO letter, No adverse effect to historic resources.

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;	Not in any NDDDB area. According to DEEP: "If appropriate, the use of pervious surfaces for sidewalks is encouraged." DOH encouraged the development team to follow DEEP's recommendations. According to development team: "Pervious sidewalks are not practical, for several reasons: 1) Pervious concrete degrades at a much faster rate than traditional concrete, 2) Pervious bituminous is extremely expensive in applications where a relatively small amount of pavement is being utilized, 3) The underlying soils are compacted Udorthents, which provide very little if any infiltration capacity, which removes any environmental benefit from pervious surfaces, 4) As an affordable project, cost is an issue and pervious pavement is significantly more expensive than traditional pavement. The cost of the pavement is more expensive, but it also requires underdrains that are not typically required for traditional sidewalks."
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	A Phase I ESA was done, and no Recognized Environmental Conditions (RECs) were identified. A Hazardous Material Assessment was also done. No Asbestos, lead based paint, Mold was detected. According to DEEP, "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." "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." The development team confirmed: "PCB assessment will be completed" "Soil disturbance (based on current scope of work) is surface level."
Substantial aesthetic or visual effects;	The project is not expected to cause substantial aesthetic or visual impacts in the area.

Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;	Proposed project is consistent with the State C&D Plan Growth Management principles #1 (Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure); Growth Management Principle #2 (Expand Housing Opportunities and Design Choices to Accommodate a variety of Household Types and Needs); and Growth Management Principle #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options).
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	No direct, indirect, or cumulative impacts.
Displacement or addition of substantial numbers of people;	No direct, indirect, or cumulative impacts.
Substantial increase in congestion (traffic, recreational, other);	No direct, indirect, or cumulative impacts.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	No direct, indirect, or cumulative impacts.
The creation of a hazard to human health or safety;	No direct, indirect, or cumulative impacts.
Effect on air quality;	The proposed project is not a commercial or industrial facility. The proposed project is residential apartments. During construction there can be a little air dust issue, but no direct, indirect or cumulative impacts are anticipated. DOH advised clients to adopt best management practices to reduce potential air quality impacts.
Effect on ambient noise levels;	No direct, indirect, or cumulative impacts.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No direct, indirect, or cumulative impacts.
Effect on agricultural resources;	Not any adverse impact on agricultural land is anticipated.
Adequacy of existing or proposed utilities and infrastructure;	Existing utilities are present on site and in the area.

	According to DEEP “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.” The development team confirmed “Water use is expected to decrease as a result of the proposed improvements. The existing facility uses between 60 and 90 CCF of water per month (CCF = 748 gallons) which is between 44,880 gallons and 67,320 gallons per month. Renovation will include water saving devices, such as low flow toilets, showerheads and faucets which is expected to reduce use. As noted, the facility is using (and will use) a fraction of the 50,000 gallon per day threshold.”
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Not any adverse impact is anticipated.

Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Based on the scope of the project, no climate change impacts are anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Not any adverse impact is anticipated.
Cumulative effects.	Based on the scope of the project, the proposed project is not anticipated to result in any cumulative impact on the environment. The project will provide additional affordable housing.

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

NA

PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DOH recommends that the project proceed as proposed and preparation of an Environmental Impact Evaluation (EIE) is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

DEEP comments are received and addressed in the ERC.