



To: Mithila Chakraborty, Ph. D, DOH
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Date: 1/13/2026

Subject: Notice of Scoping for Windsor Locks TOD – Phases 1 and 2

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for Windsor Locks TOD-Phases 1 & 2. The address of the proposed project is 255 Main Street, Windsor Locks, CT. Building upon the state of Connecticut's newly relocated train station on the neighboring parcel, Trinity is proposing a two-phase, mixed-use redevelopment of 255 Main Street in Windsor Locks, Connecticut. This \$84-million transit-oriented development (TOD) will replace an aging 37,000-square-foot commercial/retail strip center from 1987 with 120 mixed-income apartments over ground-floor commercial space. Anchoring the north end of Main Street, the Windsor Locks TOD project will unlock and activate a long-underutilized 3.2-acre parcel with a design that engages with the new train station and Main Street. The Windsor Locks TOD project will be delivered in two phases: a 70-unit first phase and a 50-unit second phase. In 2022, Governor Lamont broke ground on a new \$65-million train station in Windsor Locks that will return the town's existing station back to its original location in the downtown area, which is adjacent to 255 Main Street site and the town's historic train station. The new station will include a high-level platform to allow for level boarding from every train car and will continue to offer shuttle bus connections to Bradley International Airport via CT Transit bus route 24. The new Windsor Locks station will be served by both the CT Rail's Hartford line with service to Springfield, Massachusetts and New Haven, as well as four Amtrak lines, and is expected to be completed in the summer of 2025. As part of the new train station, the state of Connecticut will also be making streetscape improvements along Main Street that will strengthen the connection of downtown Windsor Locks to the project site. The plans for the Windsor Locks TOD project call for the abatement and demolition of the existing 37,000 square-foot commercial property on the site that was built in 1987, as well as demolition of the existing parking lot and stormwater drainage system. The Phase I and II Environmental Site Assessments completed by in late 2023 and early 2024 by McPhail Associates indicates a number of Areas of Concern and Recognized Environmental Conditions, including the historical filling of a pond that previously occupied the property, historical railroad yard/use, former coal storage, former gasoline filling station, and petroleum impacts to the soil and groundwater from an off-site gasoline filling station. This contamination is a significant obstacle that is preventing the property from being redeveloped. The site will need to be further investigated and remediated, and the existing building will need to be abated and demolished before the site can be redeveloped into the mixed-use project

contemplated by Trinity. The project's hazardous material study, which was completed in the spring of 2024, identified asbestos-containing materials in the tiles and on the roof of existing building. Four of the units within the complex tested positive for lead-based paint. PCB-containing light ballasts and/or Mercury-containing equipment, were also both identified in the hazardous materials study.

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 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.

Marlene Krajewski, Water Planning and Management Division, Marlene.Krajewski@ct.gov

The proposed project site is adjacent to the Windsor Locks Canal, which connects directly to the Connecticut River. The Connecticut River (CT4000-00_03) is impaired and not suitable for recreational activities due to elevated levels of bacteria and has also recently identified as having quantities of PCBs (Polychlorinated Biphenyls) and PFOS (Perfluorooctane Sulfonic Acid). The redevelopment and remediation of this site has the potential to contribute additional pollutants to the Connecticut River, as well as Kettle Brook, an unimpaired river 0.5 miles south of the site. Due to existing contamination at the site, proper management measures for stormwater and sediment should be taken during remediation to minimize impacts to water quality.

CT DEEP encourages limiting new pervious surfaces and including Green Infrastructure/Low Impact Development in any new construction, as well as in the streetscape improvements along Main Street, through the installation of green roofs, bioswales, or any other applicable best management practices. Preserving the existing and/or installing an enhanced riparian buffer between the site and the Canal can further protect water quality.

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

The area in which the project is proposed is located within the CT Water Company's service area, so public water supply will be available if needed. 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.

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.

Robin Blum, Wildlife Division – Natural Diversity Database, Robin.Blum@ct.gov

The project site is partially located in an NDDDB Area. An NDDDB review will be necessary in order to comply with state permit requirements to demonstrate compliance with the Endangered Species Act. Applicants should utilize DEEP's ezFile portal to submit a review request. These comments apply only to state listed species and do not address potential impacts to more common 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.

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

Site investigation has identified contaminants of concerns (COCs) in soil, including petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAH), semi-volatile organic compound (SVOCs), volatile organic compounds (VOCs) and metals notably (SPLP Lead), primarily within shallow fill material and localized soils in portions of the site. Groundwater sampling has identified VOCs at concentrations above the GA Groundwater Protection Criteria.

Given the proposed demolition, replacement of stormwater infrastructure and extensive excavation associated with the proposed redevelopment and subsurface disturbance may encounter impacted materials or alter the exposure pathways. Licensed environmental professional (LEP) oversight should be maintained throughout all phases of investigation,

abatement, demolition and construction. The redevelopment of the site should retain flexibility for additional investigation and remediation action to ensure continued compliance with the Remediation Standard Regulations (RSRs) and protection of human health and the environment.

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.

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:

Allison Forrest-Laiuppa, Emergency Response and Spill Prevention Division, Allison.Forrest-Laiuppa@ct.gov

A release of 2.5 ppm of PCBs on Main Street in Windsor Locks occurred in 2004 and was cleaned up to non-detection.

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