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:	6/23/2026
Name of Project/Action:	Windsor Locks TOD – Phases 1 and 2
Project Address(es):	255 Main Street, Windsor Locks, CT
Affected Municipalities:	Windsor Locks
Sponsoring Agency(ies):	DOH
Agency Project Number, if applicable:	DOH25-0282-165
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 impact

☒ 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:

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.

Description of the Proposed Action:

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 CTrail'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 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. A Remedial Action Plan (RAP) was prepared and submitted. As part of the schedule final verification report of RAP will be submitted in 2027 to DEEP. Tribal consultation was done as part of the 811 PRA funding and no concern received.

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 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." "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." **DOH encouraged the development team to follow DEEP's recommendations. According to development team:** "The overall drainage patterns of the site will remain unchanged by the project. The redevelopment area sheet flows east to an existing stormwater conveyance network and is conveyed east toward the Windsor Locks Canal through an existing 90-inch

	corrugated metal pipe (CMP) culvert. The redevelopment will not increase runoff to the Canal. Stormwater quality will be improved through the use of deep-sump catch basins and hydrodynamic separators designed to achieve approximately 90 percent removal of Total Suspended Solids (TSS), consistent with the Connecticut Stormwater Quality Manual. The project will also comply with the Connecticut General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. Given the fully developed nature of the site, opportunities for additional green infrastructure practices are limited. However, stormwater treatment measures and site design improvements incorporated into the project will enhance water quality relative to existing conditions."
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 setting; OR B. Disruption of an archeological or sacred site;	No direct, indirect, or cumulative impacts.
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;	**According to DEEP NDDB:** "The project site is partially located in an NDDB Area. An NDDB 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." **DOH encouraged the development team to follow DEEP's recommendations. According to development team:** "A Natural Diversity Data Base (NDDB) review was initiated for the project on January 26, 2026. A determination was received on January 30, 2026 (NDDB Determination No. 202600977; *Attachment D*), indicating that no anticipated adverse impacts to endangered or threatened species are associated with the proposed project."

Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	**According to DEEP Remediation Division:** "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." **The development team confirmed:** "A Phase I Environmental Site Assessment (dated December 15, 2023, and updated November 12, 2024, and again on December 29, 2025) and a Phase II Environmental Site Investigation (dated July 22, 2024) were completed for the project site by McPhail Associates, LLC. under the oversight of William Burns, LSP, LEP. Recommendations listed in the Phase II report included additional assessment and analysis of fill material, potential reclassification of the groundwater classification to GB, and supplemental subsurface investigation to further characterize soil for management and off-site disposal, as appropriate. Consistent with CT DEEP's recommendations, LEP oversight will be maintained throughout demolition, excavation, and construction activities. The redevelopment will retain flexibility to conduct additional investigation and implement remedial measures, as necessary, to ensure continued compliance with the RSRs and the protection of human health and the environment."
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	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

regional or municipal land use plans;	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. A noise study was done and found to be within HUD suggested limits.
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.
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

On October 10, 2025, a wetland scientist assessed the project site, and no wetlands or surface watercourses were observed on the property (*Attachment E*, Wetland Memorandum). A mapped watercourse traverses the site through an existing subsurface culvert that ultimately discharges to the Connecticut River. The inlet and outlet structures associated with the culvert are located off site**.** Proposed work consists of cleaning and relining approximately 263 linear feet of the existing 90-inch CMP culvert and installing two concrete access vaults at the eastern (10-foot by 10-foot) and western (10-foot by 14-foot) ends within the existing culvert footprint (see *Attachment B*, Sheets CG-101 and CD-507).

Proposed work involves rehabilitation of existing infrastructure within the existing culvert alignment and footprint. No new fill is proposed within open waters, and no channel relocation or expansion of Waters of the United States is proposed. Temporary measures will be implemented during construction, as necessary, to manage flows and prevent sediment transport in accordance with best management practices. Erosion and sedimentation controls consistent with the Connecticut Stormwater Quality Manual will also be implemented.

A regulatory guidance request and coordination meeting were held with the U.S. Army Corps of Engineers (USACE), New England District, on April 29, 2026, regarding the proposed culvert rehabilitation activities. Following that coordination, USACE provided correspondence indicating that the proposed work does not appear to be within the regulatory jurisdiction of the USACE and therefore does not appear to require authorization under Section 404 of the Clean Water Act. Accordingly, a Section 401 Water Quality Certification is not anticipated for the proposed work.

The proposed project occurs on a 3.2-acre parcel. A Special Use Permit and Site Plan Review was approved by the Town of Windsor Locks Planning and Zoning Commission on October 28, 2024 (Attachment G). However, the project still requires a General Permit for the Discharge of Dewatering and Remediation Wastewaters from DEEP because a release in soil has been identified at the site which could impact dewatering activities. Thus, the pollutants in soil are “believed to be

present" and/or "suspected" in the dewatering discharge. Pursuant to Section 2.1.1 of the General Permit for the Discharge of Dewatering and Remediation Wastewaters, dewatering of wastewater is an Eligible Activity/Discharge.

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.