



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: 09/2/2026
Name of Project/Action: Cambridge Park
Project Address(es): 98 Jerome Avenue, Bristol, CT 06010
Affected Municipalities: Bristol

Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: DOH25-0216-017
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: SHPO has determined that the proposed undertaking may have an adverse effect upon the historic integrity of the complex. Therefore, this office recommends that all feasible alternatives be explored to avoid or minimize the adverse effect. A Memorandum of Agreement between BHA and the CT SHPO regarding the rehabilitation of Cambridge Park, including stipulations like duration, monitoring, reporting and more. This was signed by both the City of Bristol, SHPO, and BHA dated September 4th, 2024.

☒ 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:

The Cambridge Park development is a 189-unit development in eighty-three (83) residential buildings on 39.953 acres (4 units designated as non-dwelling units serve as activity space for the Boys & Girls Club for a total of 193 units). The development was initially constructed in 1942 as wartime housing but is now operating as public housing and is owned by the Housing Authority of the City of Bristol (BHA). The site also includes a 12,100 square foot Administration Building that houses the BHA's administrative office, computer rooms, and community room with an adjacent kitchen and bathrooms.

Description of the Proposed Action:

The Cambridge Park development is located along Jerome Ave in Bristol. Part of the property is adjacent to wetlands, however the residential section of the development is not in the wetlands. The development is surrounded by single-family dwellings, religious facilities, and a commercial corridor along Route 6 within 1/4 mile with multiple shopping centers including a Stop n' Shop grocery store anchor that is two blocks and walking distance from Cambridge Park.

Approximately 5% of the units have been completely renovated since 2014. However, a Capital Needs Assessment conducted in 2023 found the buildings physically obsolete with a estimated \$40+ million the current capital needs and recommended replacement of the building's MEP systems, underground utilities, roofing systems, appliances, kitchen and bathroom cabinetry, and exterior and interior improvements. Due to costly relocation challenges and SHPO concerns over the loss of all buildings potentially eligible for historic designation, complete demolition is not feasible. BHA in partnership with Bristol Neighborhood Development Corporation (BNDC), it's non-profit affiliate, is proposing a comprehensive (gut) rehabilitation of the property to produce 167 units. This total is the result of the demolition of 20 units in 8 buildings due to excessive foundation repair costs, conversion of 4 units into 2 accessible family units, and 4 units to remain for the Boys & Girls Club. Planned gut rehab will include enhanced building insulation, new roofing, fiber cement siding, drywall, flooring, full kitchen and bathroom renovations, and installation of in-unit washers and dryers. Additionally, plumbing, HVAC, and electrical systems will be modernized. Infrastructure improvements will replace sanitary sewer and water lines, and storm drainage, repaved parking lots, new sidewalks, curbs, and landscaping, cost effective sustainability and energy efficiency measures, and compliance with all federal accessibility requirements under Section 504, 2010 ADA Standards and the Uniform Federal Accessibility Standards (UFAS). In addition, the redevelopment will increase the number of accessible units from 0 to 9. This project is addressing extensive physical needs at an existing development that has been in the community since 1942 and is the home of 182 families with over 466 residents. Based on the physical needs of the development, the property is considered obsolete and in dire need of major physical improvements and upgrades. Without this redevelopment, the buildings and units will continue to deteriorate forcing the 182 families and over 466 residents to be relocated from the property and community. Due to the deferred maintenance and deterioration common with public housing, multiple buildings require demolition. No new units will be produced as a result of this development.

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: Housing Authority of the City of Bristol will continue to own the land subject to a long term ground lease.

Anticipated ownership upon project completion:

☐ N/A, ☐ State; ☐ Municipal, ☒ Private,
☒ Other: This has two parts and the ownership will go into effect at the initial financial closing. 1. Site ownership: Other: Housing Authority of the City of Bristol will continue to own the land subject to a long term ground lease. 2. The improvements (buildings, infrastructure): Private: Cambridge Park Limited Partnership, a for-profit limited partnership, was formed to own the improvements to enable the utilization of Low-Income Housing Tax Credits (LIHTC).

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;	Water Planning and Management Division, DEEP, commented: “The proposed comprehensive rehabilitation of Cambridge Park located at 98 Jerome Avenue, Bristol, is located in New Britain Water Department's Upper and Lower White's Bridge Aquifer Protection Areas and Bristol Water Department's Mix Street Aquifer Protection Area as shown on the Aquifer Protection Area Interactive Map. The proposed rehabilitation of the Cambridge Park housing development is a land use that is not regulated by the Aquifer Protection Area Program. However, it is recommended that the developer is aware of the location in the aquifer protection area and implement Best Management Practices (BMPs) and take precautions to protect this sensitive drinking water area. BMPs from the Connecticut's Aquifer Protection Area Program Municipal Manual entitled BMPs for Temporary Construction Operations in Aquifer Protection Areas, Disposal of Snow Accumulations from Roadways and Parking Lots, Controlling Stormwater in Parking Lots and Road Salt Storage, as well as other BMPs, can be found in the Appendices of the Municipal Manual. Additional stormwater management measures must be in place to prevent contaminated stormwater discharges/releases to the ground, apply stormwater discharge and treatment measures that protect groundwater quality, and encourage safe recharge of stormwater where it does not endanger groundwater quality. Additional management measures include: preventing illicit discharges to stormwater discharged to the ground, providing necessary impervious pavement in high potential pollutant release areas such as intensive parking areas and roadways, and discharging paved surface runoff to aboveground type land treatment structures (such as surface drains, sheet flow, surface swales, depressed grass islands, detention/retention and infiltration basins, and wet basins). These measures take advantage of natural treatment processes in soil and vegetation before discharge to the groundwater and promote natural aquifer recharge. Any catch basins that are installed should have deep sumps to trap sediments and hoods to trap oil and grease. Please see the Instructions for Developing a Stormwater Management Plan and Aquifer

	Protection Stormwater Management Plan Supplement in the "Guidance" section at the bottom of the Aquifer Protection Area Businesses and Industry Information page. For future deicing activities in the parking areas, all deicing chemicals must be stored inside a building or under a roof with impervious pavement, protected from stormwater run-on and run-off. Outside storage of deicing chemicals is prohibited in an Aquifer Protection Area. It is recommended that the developer create a map of the proposed project work area with the Aquifer Protection Area overlay and use this map in their planning, construction plans, permit applications, and any public outreach materials they use and distribute. The project map with the Aquifer Protection Area outline and the parcel boundary should be shared during their virtual public scoping meeting. More maps and GIS shapefiles are located on DEEP's Aquifer Protection Area Maps Page. https://portal.ct.gov/DEEP/Aquifer-Protection-and-Groundwater/Aquifer-Protection/Aquifer-Protection-Area-Maps." "The project site is 0.4 miles from Polkville Brook and 0.7 miles from Coppermine Book, both which have impaired water quality and both which drain to the Pequabuck River. There is a Total Maximum Daily Load for the entirety of the watershed due to elevated bacteria. There is also a Pequabuck River Watershed Based Plan that builds off of this, which includes recommendations for actions to address contaminants. During both demolition and construction, proper management measures for stormwater and sediment should be taken to prevent further degradation to these waterbodies. In planning the site's renovation, DEEP recommends incorporating Green Stormwater Infrastructure/Low Impact Development to manage stormwater runoff onsite to minimize/reduce the impact of polluted stormwater from reaching receiving surface waters." DOH encouraged the development team to follow DEEP's recommendations. According to development team: "Moving forward, we will incorporate the Aquifer Protection Area overlay map into the project specifications, construction documents, and other relevant project materials, consistent with DEEP's recommendation. The project team has already included a detailed aquifer overlay within our environmental assessments and planning documents to ensure groundwater protection considerations are reflected throughout the design process. The project site's location within the New Britain Water Department Upper and Lower White's Bridge Aquifer Protection
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	Areas and the Bristol Water Department Mix Street Aquifer Protection Area has been evaluated throughout the environmental review process. In addition, the project has obtained the necessary aquifer-related approvals. • Best Management Practices (BMPs) for construction activities have been incorporated into the project specifications, including erosion and sediment controls, spill prevention measures, material handling requirements, and contractor environmental compliance obligations. • Stormwater management improvements have been designed to protect groundwater quality, minimize pollutant migration, and provide appropriate treatment and drainage controls in accordance with applicable standards. • Erosion and sedimentation controls will be implemented during demolition and construction activities to prevent impacts on nearby water resources and the Pequabuck River watershed. • Any future storage of de-icing materials will comply with Aquifer Protection Area requirements, and outdoor storage within the Aquifer Protection Area will be prohibited. • The Aquifer Protection Area overlay map will be added to the project specifications and construction documents to further support awareness and compliance during project implementation. AQUIFER PROTECTION AREA GUIDANCE, Best Management Practices for Temporary Construction and Reconstruction Operations in Aquifer Protection Areas, CT Department of Energy and Environmental Protection 7/7/2014 was provided during permitting process and these best management practices will be incorporated.
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	SHPO has determined that the proposed undertaking may have an adverse effect upon the historic integrity of the complex. Therefore, this office recommends that all feasible alternatives be explored to avoid or minimize the adverse effect. A Memorandum of Agreement between BHA and the CT SHPO regarding the rehabilitation of Cambridge Park, including stipulations like

setting; OR B. Disruption of an archeological or sacred site;	duration, monitoring, reporting and more. This was signed by both the City of Bristol, SHPO, and BHA dated September 4 th , 2024.
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: “This project is located outside of a Natural Diversity Data Base (NDDDB) Area. Connecticut state listed species are not documented in the project vicinity, no impacts are expected, and further consultation with the NDDDB program is not required. These comments are applicable to Connecticut state listed species and do not address potential impacts to more common species.” DOH encouraged the development team to follow DEEP’s recommendations.
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 October 2025. This assessment has revealed the following RECs in connection with the Site: • REC 1 – Abandoned USTs: former investigations confirmed the presence of four heating oil USTs which were abandoned in place and filled with concrete. Evidence of a release was observed at three of the four locations (TP-02, TP-03 and TP-04), and no evidence of a release was observed in the fourth location. These releases were reported to DEEP by the Housing Authority of the City of Bristol on October 14, 2016 and were issued the Case No. 2016- 05555. These tanks reportedly remain in place. In addition, historical mapping indicates that several additional USTs were present in the eastern half of the Site that were not previously investigated. Focused subsurface investigation was done November 2016 and Based on the results of our focused subsurface investigation, no significant releases or source areas associated with former USTs are located in the Phase I renovation area. Although petroleum-impacted groundwater was encountered on the downgradient, northeast corner of the Phase I renovation area, these releases appear to be associated with releases on the adjacent Phase II renovation area where four abandoned USTs were identified. Therefore, we recommend no further investigation and/or remediation for the Phase I renovation area. Phase I/II/III ESA findings and the 2023 Lead-Based Paint Inspection & Risk Assessment prepared by Fuss & O’Neill findings requiring remediation have been or will be completed by BHA and are outside the scope of this Application and project. Please see below this paragraph the findings of the 2023 Fuss & O’Neill Lead-Based Paint Inspection & Risk Assessment. Lead abatement was completed by BHA and is outside the scope of this Application. However, as noted below additional lead-based paint testing was

	conducted by Eagle and those findings are reflected as additional scope (i.e. window frames & siding). <u>Lead-Based Paint Inspections Risk Assessment</u> – Prepared by Fuss & O’Neill – June 15, 2023 1. Lead-Based Paint Testing a. Toxic levels of lead painter were detected within the interiors of multiple units. b. Toxic levels of lead painter were detected at the exteriors of multiple units. 2. Lead in Dust a. A lead in dust hazard exists within the Administrative Building Garage and 73 Davis Drive. 3. Lead in Soil a. A lead in soil hazard exists at 134/136/138/140 Davis Drive. Please note that all findings are based on the Limited Hazardous Materials Inspection Report dated 11/16/2016 prepared by Fuss & O’Neill and the Supplemental Asbestos Bulk Sampling and Lead-Based Paint Testing Results to Support Hazardous Materials Abatement Design dated 12/29/2025 (sampling conducted in 2024 and 2025) prepared by Eagle Environmental, Inc. The findings are summarized below. <u>Limited Hazardous Building Materials Inspection</u> – Prepared by Fuss & O’Neill - November 16, 2016 1. Asbestos Inspection: a. Flooring materials and mastics; b. Joint taping compound (ACM and vermiculite – assumed ACM); c. Interior tub caulking compounds; d. Exterior window caulking compounds; e. Interior textured ceiling material (vermiculite – assumed ACM); and f. Exterior door caulking compounds. 2. Lead-Based Paint Determination: a. Interior wood door casings; b. Interior wood stair posts; c. Exterior metal window lintels; d. Exterior wood window lintels; e. Exterior metal door lintels; f. Exterior wood under aluminum corner boards; and g. Exterior wood fascia under aluminum.
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	3. Radon Gas Sampling a. Radon concentrations from 0.1 pCi/L to 5.4 pCi/L found below the EPA recommended action level of 4.0 pCi/L. 4. PCBs Bulk Sample Analysis a. Analytical results indicated the materials tested contained regulated concentrations of PCBs including interior window caulk, exterior door caulk, and exterior window caulk. 5. Lead in Drinking Water Sampling a. Analytical results of water samples collected were below the EPA standard limit of 0.015 mg/l. 6. Lead in Soil Sampling a. With one exception, the analytical results of the soil samples collected and analyzed were below the CTDPH standard for lead in soil of 400 mg/kg. At 150 Jerome Avenue lead was detected at greater than 400 mg/kg. 7. Assessment of Mold-Contaminated Building Materials a. Suspected mold growth was identified on accessible or visible building materials within several of the representative building areas inspected including bathrooms and kitchens. 8. Assessment of Urea Formaldehyde Foam Insulation (UFFI) a. No suspected UFFI was observed. 9. PCB-Containing Fluorescent Light Ballasts and Mercury-Containing Lamps a. PCB-Containing Fluorescent Light Ballasts or Mercury-Containing Equipment were inventories in-place. <u>Supplemental Asbestos Bulk Sampling and Lead-Based Paint Testing Results to Support Hazardous Materials Abatement Design</u> – Prepared by Eagle Environmental – December 29, 2025 (sampling conducted in 2024 and 2025)
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.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	No direct, indirect, or cumulative impacts. According to DEEP: “The project description states that that there are no wetlands on the site and that no fill will be placed in wetlands/watercourses. If no fill is being placed within wetlands or watercourses no permitting from LWRD is required.”
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;	Not any adverse impact is 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.