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).

State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

PART I – Initial Review and Determination

Date:	03/22/2024
Name of Project/Action:	85 Tremont Street
Project Address(es):	85 Tremont Street, Meriden, CT 06450
Affected Municipalities:	Meriden
Sponsoring Agency(ies):	DOH
Agency Project Number, if applicable:	CHFA 4% Project: 23-403 and 9% Project: 24-914
Project Funding Source(s)/Program(s), if known:	Low-Income Housing Tax Credits, Federal Historic Tax Credits, State Historic Tax Credits, Federal Solar Tax Credits, DOH Flex Loan, DOH HOME Funds (9% Deal Only), CHFA Opportunity Funds, CHFA Permanent Loan, DECD Municipal Brownfield Funds, DECD Community Investment Funds

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: The CT State Historic Preservation Office (SHPO) has reviewed the Part 1 application, "Determination of Historic Structure Status," for the above-listed building and has determined that the project is likely be listed in the National Register of Historic Places. Tribal consultation was also done with state recognized tribes and as per need of the consultation, more information on boring depth was provided.

☒ 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 1

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 purpose of the project is to create twenty-seven (27) and fifty-five (55) units of mixed-income, rental housing. Units will be available to income-qualified households at 30%, 50%, 60% and 80% of area median income. There is a critical need for affordable housing in Meriden.

Description of the Proposed Action:

A former industrial mill complex will be renovated and financed to create section A twenty-seven (27) units of rental housing under 4% and section B fifty-five (55) units of rental housing under 9% Low-Income Housing Tax Credits. Trinity Tremont Nine Limited Partnership ("Trinity", an affiliate of Trinity Financial, Inc.) plans to transform the historic 123,000 square-foot Aeolian Company building in Meriden, Connecticut into 82 units of mixed-income rental housing. Trinity's proposed adaptive reuse project will breathe new life into a historic asset, remediate a Brownfields site, and provide new rental housing at four income tiers. The 85 Tremont Street property is located within Meriden's Adaptive Reuse Overlay District, which was implemented to catalyze the redevelopment of vacant and underutilized historic industrial buildings. The Aeolian Company building sits on a parcel of land that is roughly 2.2 acres.

Alternatives Considered:

No Action Alternative.

Public concerns or controversy associated with the proposed action:
None.

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 to groundwater and surface water quality. DEEP comments indicated the applicability of Stormwater and Dewatering Wastewaters from Construction Activities depending on the size of the disturbance regardless of phasing. This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. Given the property spans over an acre and construction activities will disturb an area greater than an acre, the project will be subject to enrollment under a Construction General Permit for Stormwater and Dewatering Wastewaters from Construction Activities. The project will manage construction stormwater runoff in accordance with the Stormwater Pollution Control Plan (SWPCP) that was prepared by Fuss & O'Neil, which has been incorporated into the permitted set of drawings for the project and Contract Documents. Additionally, the Contract Documents for the project include specification Section 15713 – Temporary Erosion and Sediment Control that further include requirements for stormwater management during construction. With respect to post-construction stormwater management, on-site recharge/infiltration of stormwater is not considered feasible due to the presence of contamination in soil and groundwater.
Effect on a public water supply system;	The project will not have any impact on public water supply system. Staff from DEEP also reviewed the location of this project and found that it is not in an aquifer protection area.
Effect on flooding, in-stream flows, erosion, or sedimentation;	The project site is not located in 100- or 500-year flood zone. DEEP commented on Watershed Management as: The proposed project and resulting runoff are a piece in a larger watershed area. The project is a half-mile north of Harbor Brook, an impaired river that is a tributary to the Quinnipiac River. The impairments for Harbor Brook are likely due to illicit discharges to storm sewers and failed sanitary infrastructure. To minimize the water quality impacts of the development, proper management measures for stormwater and sediment should be in place during construction. The applicant should also ensure that activities related to the brownfield remediation are properly managed as to not impact water resources.

	The project will manage construction runoff in accordance with the Stormwater Pollution Control Plan (SWPCP) that was prepared by Fuss & O'Neil and has been incorporated into the permitted set of drawings for the project and Contract Documents. Additionally, the Contract Documents for the project include specification Section 15713 – Temporary Erosion and Sediment Control which further include requirements for stormwater management during construction. The development team understand that erosion and sediment control measures, which include hay bale barriers, silt fences, silt socks and erosion control blankets, will mitigate the off-site flow of soil sediments that may be disturbed during excavation activities. Further, the planned phasing of construction will minimize the duration that areas of excavation are exposed and thus mitigate the off-site flow of soil sediments during redevelopment activities.
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;	A former industrial mill complex will be renovated and financed to create quality affordable housing. The project has been reviewed by State Historic Preservation Office and responsible Tribes. The CT State Historic Preservation Office (SHPO) has reviewed the Part 1 application, "Determination of Historic Structure Status," for the above-listed building and has determined that the project is likely be listed in the National Register of Historic Places. Tribal consultation was also done with state recognized tribes and as per need of the consultation, more information on boring depth was provided.
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;	The project is not located in any Natural Diversity Database area. According to DEEP too it was not in a Natural Diversity Database Area. So, this project will not have any effect on natural communities of critical habitat. DEEP commented on Fisheries Division as: Harbor Brook is located a half-mile from the project site and is the site of a multimillion dollar project that includes daylighting, floodplain creation, instream habitat diversification, and other improvements. Harbor Brook is an important aquatic resource with a diverse fish community that includes the catadromous American eel, wild brook trout, brown trout, as well as a variety of other fish species. In order to prevent or reduce impacts from runoff from this site, the Fisheries Division recommends utilizing Low-Impact Development techniques in the design. This could reduce impervious cover which will benefit the watershed as a whole. Information on Low-Impact Development techniques can be found on DEEP's website in a Fact Sheet for Green Infrastructure. The project will manage construction runoff in accordance with the Stormwater Pollution Control Plan (SWPCP) that was prepared by Fuss & O'Neil and has been incorporated into the permitted set

	of drawings for the project and Contract Documents. Additionally, the Contract Documents for the project include specification Section 15713 – Temporary Erosion and Sediment Control which further include requirements for stormwater management during construction. The development team understand that erosion and sediment control measures, which include hay bale barriers, silt fences, silt socks and erosion control blankets, will mitigate the off-site flow of soil sediments that may be disturbed during excavation activities. Further, the planned phasing of construction will minimize the duration that areas of excavation are exposed and thus mitigate the off-site flow of soil sediments during redevelopment activities.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	Based on the type and the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated. As this is Adaptive reuse of a former mill building, the project site located in 85 Tremont St. Meriden, CT 06450, has conducted a Phase I and II Environmental Site Assessment (ESA), as well as a hazardous materials survey. The Phase I and II ESAs revealed that the site has localized areas of volatile organic compounds and petroleum hydrocarbons, both of which are associated with the past industrial uses of the property. This contaminated soil will either be remediated or removed in connection with the redevelopment of 85 Tremont Street. A Phase III ESA along with Remedial Action Plan was planning to be implemented in Fall 2023. A soil management plan is also developed. The project's hazardous material study identified asbestos-containing materials in the roof's flashing system, around pipe insulation, and in the sills and caulking compound of the building's replacement windows. Several of the building's painted surfaces tested positive for lead, including the metal sliding fire and elevator doors, the wood stairwells, the original window frames, and interior areas where the brick had been painted. Construction and demolition debris will be managed and removed off-site in accordance with the Contract Documents which include specification Section 017419 – Construction Waste Management. This portion of the Contract Documents requires that construction and demolition material be segregated, reused, and/or recycled to the extent feasible, as well as the preparation of a waste management plan. Further, the above-referenced specification section requires that documentation of waste removal be provided, such as weight slips from the appropriate receiving facilities.

	The on-site management and off-site removal of soils will be performed in accordance with the Soil Management Plan that has been prepared for the project, the Remedial Action Plan, as well as the Contract Documents, which include specification Section 312001 – Management and Disposition of Excavation Soils. As noted in the Soil Management Plan that was prepared for the project, clean fill has been identified at portions of the project, which will be reused on-site to the extent feasible in accordance with Section 312000 – Earthwork of the Contract Documents. A Hazardous Building Materials Inspection was completed by Fuss & O'Neil for the project which identified asbestos-containing material (ACM), lead-based paint, PCB-containing materials, as well as mercury-containing equipment. In order to address the abatement, management and off-site removal of these materials, Hazardous Building Materials Abatement Plans have been prepared by Fuss & O'Neil, which are incorporated into the permit set of drawings for the project. In addition, specification Sections 028213 – Asbestos Abatement, 028416 – Handling of Lighting Ballasts and Lamps containing PCBs and Mercury 028319 – Lead Paint Awareness, and 028434 – PCB Removal & Disposal have been included in the Contract Documents for the project. These plans and specifications require proper disposal of the special wastes at licensed facilities by licensed contractors.
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;	85 Tremont Street is located within Meriden's recently established Adaptive Reuse Overlay District, which was implemented to catalyze the redevelopment of vacant and underutilized historic industrial buildings. Project plans have received approval from the relevant boards. Scope of project is designed to comply with these standards. Temporary disruption is expected during making the mill building to residential, but the long-term affect will be positive to the site and neighborhood.
Displacement or addition of substantial numbers of people;	No direct, indirect or cumulative impacts.

Substantial increase in congestion (traffic, recreational, other);	During work there can be some temporary traffic but best management practice will be adopted to reduce the impact.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	Some increase may occur as the building will be residential. Project proposes efficient HVAC building systems, window treatments, and insulation that is consistent with the Secretary of the Interior's Standards for Historic Preservation.
The creation of a hazard to human health or safety;	Adaptive reuse will reduce any risk associated with health and safety.
Effect on air quality;	During construction or reuse there can be a little air dust issue but no direct, indirect or cumulative impacts are anticipated from reuse work. DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits. DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits. DOH advised client to adopt best management practices including those from DEEP to reduce potential air quality impacts. Contractors on the project will be using recent equipment (such as dump trucks, excavators and support vehicles) that have been built after model year 2007. Development team understand that this equipment meets the latest EPA standards for construction projects. Additionally, Contractors on the project will be adhering to Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA), which limits the idling of mobile sources to three minutes.
Effect on ambient noise levels;	No noise issue is anticipated from reuse work. The project site 85 Tremont St. Meriden, CT 06450 is within 3,000 ft of a railroad.

	Consideration of road, railway a noise assessment was done, and it is in limit.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	Not any adverse impact on coastal or inland wetland are anticipated.
Effect on agricultural resources;	Not any adverse impact on agricultural land is anticipated. The project site 85 Tremont St. Meriden, CT 06450 doesn't fall in any important farmland soils. It is urban land.
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. Project proposes the adaptive reuse of a former industrial mill building which reduces the need for embodied carbon in building materials used to create housing.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Not any adverse impact is anticipated. Project proposes the adaptive reuse of a former industrial mill building which reduces the need for embodied carbon in building materials used to create housing.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Not any adverse impact is anticipated. Site is not in a productive aquifer or protected area. Site is not located in a designated agricultural area.
Cumulative effects.	Positive cumulative impact on reusing a previous mill structure for residential building meeting more housing needs.

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

DEEP has made recommendations in their review letter dated September 21, 2023 (attached). On request of DOH, Developer/Consultant confirmed that all comments were considered.

(1) Stormwater Management during Construction: Given the property spans over an acre and construction activities will disturb an area greater than an acre, the project will be subject to enrollment under a Construction General Permit for Stormwater and Dewatering Wastewaters from Construction Activities. The project will manage construction stormwater runoff in accordance with the Stormwater Pollution Control Plan (SWPCP) that was prepared by Fuss & O'Neil, which has been incorporated into the permitted set of drawings for the project and Contract Documents. Additionally, development team note that the Contract Documents for the project include specification Section 15713 – Temporary Erosion and Sediment Control that further include requirements for stormwater management during construction. With respect to post-construction stormwater management, on-site recharge/infiltration of stormwater is not considered feasible due to the presence of contamination in soil and groundwater.

(2) Watershed Management and Fisheries Division: The project will manage construction runoff in accordance with the Stormwater Pollution Control Plan (SWPCP) that was prepared by Fuss & O'Neil and

has been incorporated into the permitted set of drawings for the project and Contract Documents. Additionally, development team note that the Contract Documents for the project include specification Section 15713 – Temporary Erosion and Sediment Control which further include requirements for stormwater management during construction. Development team understand that erosion and sediment control measures, which include hay bale barriers, silt fences, silt socks and erosion control blankets, will mitigate the off-site flow of soil sediments that may be disturbed during excavation activities. Further, the planned phasing of construction will minimize the duration that areas of excavation are exposed and thus mitigate the off-site flow of soil sediments during redevelopment activities.

(3) Solid Waste Disposal: Construction and demolition debris will be managed and removed off-site in accordance with the Contract Documents which include specification Section 017419 – Construction Waste Management. This portion of the Contract Documents requires that construction and demolition material be segregated, reused, and/or recycled to the extent feasible, as well as the preparation of a waste management plan. Further, the above-referenced specification section requires that documentation of waste removal be provided, such as weight slips from the appropriate receiving facilities. The on-site management and off-site removal of soils will be performed in accordance with the Soil Management Plan that has been prepared for the project, the Remedial Action Plan, as well as the Contract Documents, which include specification Section 312001 – Management and Disposition of Excavation Soils. As noted in the Soil Management Plan that was prepared for the project, clean fill has been identified at portions of the project, which will be reused on-site to the extent feasible in accordance with Section 312000 – Earthwork of the Contract Documents.

(4) Special Waste: A Hazardous Building Materials Inspection was completed by Fuss & O'Neil for the project which identified asbestos-containing material (ACM), lead-based paint, PCB-containing materials, as well as mercury-containing equipment. In order to address the abatement, management and off-site removal of these materials, Hazardous Building Materials Abatement Plans have been prepared by Fuss & O'Neil, which are incorporated into the permit set of drawings for the project. In addition, specification Sections 028213 – Asbestos Abatement, 028416 – Handling of Lighting Ballasts and Lamps containing PCBs and Mercury 028319 – Lead Paint Awareness, and 028434 – PCB Removal & Disposal have been included in the Contract Documents for the project. These plans and specifications require proper disposal of the special wastes at licensed facilities by licensed contractors.

(5) Air Management: Contractors on the project will be using recent equipment (such as dump trucks, excavators and support vehicles) that have been built after model year 2007. Development team understand that this equipment meets the latest EPA standards for construction projects. Additionally, Contractors on the project will be adhering to Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA), which limits the idling of mobile sources to three minutes.

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 and Environmental Impact Evaluation (EIE) is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

No public comments provided during scoping notice period.