

Public Scoping Meeting – July 25, 2023

Note: Spelling or grammatical errors may occur as comments from the Public Scoping Meeting were recorded and are presented below verbatim.

Comment Received from Gwen George-Bruno (President, Windham Preservation Inc., 9 Weir Court, Windham, CT) during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #1.1	The current condition comments – who arrived at them and what are their credentials?	Whitney House was deemed as unsafe, and its further occupancy prohibited pursuant to State Building Code §116 by the University of Connecticut (UConn) Fire Marshall and Building Inspectors Office.
PSM #1.2	Has an independent structural assessment been completed? Are copies of any reports available?	No, a licensed engineer from UConn visited the site and concluded that the structure was beyond reasonable repair.
PSM #1.3	The greenest building is one already standing. Has anyone considered the impact of tons of debris in a landfill vs. restoration and re-use?	As described in the summary of alternatives as part of the public scoping meeting, the following were considered: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSM #1.4	Please make a copy of this presentation available.	A copy of the public scoping meeting slides is available on the project information website at https://updc.UConn.edu/whitney-house .
PSM #1.5	Has the debris been tested for asbestos? Or is this an assumption?	Asbestos has been detected in samples collected from the debris.
PSM #1.6	Whitney has been a viable resource that UConn has ignored. There are plenty of potential re-use cases. Poor stewardship is not an excuse to demo a historically significant building.	Comment noted.
PSM #1.7	Has the source of the fire been determined?	Yes, the source of the fire was electrical in nature. A Fire Investigation – Origin and Cause Report is available on the project information website at https://updc.UConn.edu/whitney-house .
PSM #1.8	Can we expect all associated reports/assessments will be shared?	Inquiries and requests to view and or copy documents, pursuant to the Freedom of Information Act, may be submitted to: https://publicrecords.UConn.edu/make-a-request/ .
PSM #1.9	What involvement does Preservation Connecticut and SHPO have in this project?	UConn met with the State Historic Preservation Office (SHPO) and Preservation Connecticut (PCT) about the proposed project, and pursuant to CGS § 22a-1 through 22a1-h RCSA § 22a-1a-1 through 22a-1a-12, each were notified of the extent and nature of any environmental effects of the proposed action and the comment period during the public scoping phase.
PSM #1.10	Does Fuss & O’Neill have any experience in historic restoration and re-purposing? I don’t see it on your website.	Fuss & O’Neill has only been contracted by UConn to provide Connecticut Environmental Protection Act (CEPA) support services.
PSM #1.11	I did find this on the Fuss & O’Neill website. I strongly suggest you pattern the restoration of Whitney house after this project from 2020. https://www.fando.com/historic-massachusetts-student-event-center-project-receives-design-award/	Comment noted.

Comment Received from Gwen George-Bruno (President, Windham Preservation Inc., 9 Weir Court, Windham, CT) during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #1.12	I have also been advised, by several local historians that UCONN has a history of fires of undetermined cause at historic buildings for which they are responsible. I believe UCONN will need to address and overcome any objections and suspicion.	See response to Comment PSM #1.7 regarding the cause of the fire.

Comment Received from Bruce Clouette, 483 Woodland Road, Mansfield, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #2.1	I would recommend when using the concept of “timeliness” to remember that the period of non-use began in 2004, 9 years ago. Similarly, when discussing funding, it be taken into account the cumulative expenditures on this building since 2004.	Comment noted.

Comment Received from Mike Vrabel, Casella Waste Systems, Willimantic, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #3.1	We are available to remove all of the tons via Roll-off Dumpsters. Also is there a considerable amount of asbestos	Comment noted. Opportunities to provide services will be published per standard University procurement processes.

Comment Received from Quentin Kessel, 97 Codfish Falls Road, Storrs, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #4.1	The University has a history of neglect of wood frame buildings, from the torching of the Farewell/Jacobson home to faculty row. This seems to be in part due to the turnover of University administrators who often lack a sense of University history. Folks like me who knew Miss Whitney regret the loss our history.	Comment noted.
PSM #4.2	Of course, a full EIE should be carried out.	Pursuant to CGS § 22a-1 through 22a-1-h RCSA § 22a-1a-1 through 22a-1a-12, UConn determined an environmental impact evaluation (EIE) was not warranted for this Action following the close of the public scoping comment period.
PSM #4.3	When the University is forced to restore a structure, such as the Farwell/Jacobson barn it often becomes and important part of the University. It was the community that got together and patched the roof of this barn. When the University threatened arrest of some of the “helpers” they were	Comment noted.

Comment Received from Quentin Kessel, 97 Codfish Falls Road, Storrs, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
	told that the press was there and please do arrest us. The University backed off at that time. So I was told!	

Comment Received from Gregory Cichowski, 53 Old Turnpike Road, Storrs, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #5.1	Why doesn't the University put the house structure for sale like they did for the Ash House back in 1999. If it's decided that the house has to be demolished, someone might be interested in restoring it at another location.	As described in the summary of alternatives as part of the public scoping meeting, the following alternatives were considered: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSM #5.2	Restoration of the Whitney Hose would be a perfect opportunity for the University to demonstrate its commitment to history	Comment noted.
PSM #5.3	The University needs to improve its record of being a better steward of our historic buildings	Comment noted.

Comment Received from Gail Bruhn, Summit Road, Storrs, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #6.1	A requirement of being listed on the National Register of Historic Places is long-term care of these properties. Why did UCONN not follow the recommendations presented on the Owens Skidmore Merrill Historic District Evaluation that was done in Oct. 2016?	UConn prioritizes historic buildings in the planning and budgeting process per the <i>University of Connecticut Historic District: Evaluation and Process</i> (Revised January 2017). Please also see response to PSM #7.1. Long-term preservation measures such as mothballing are implemented on any location permanently unoccupied. Temporarily unoccupied locations are made safe and secure pending final decisions on whether to implement long-term preservation measures based on repurposing or adaptive reuse.

Comment Received from Lionel Shapiro, UConn Philosophy, during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #7.1	What safeguards are in place to ensure that UConn does not conveniently neglect to maintain/protect historic buildings and then argue that restoration would carry prohibitive costs?	UConn prioritizes its ability to maintain and protect the many historic buildings on campus by reviewing several criteria. These include but are not limited to the history associated with the specific location, Federal and State registry status, ability to meet the Department of the Interior's Standards for Rehabilitation, advance the academic vision,

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		the potential fit with current and future programmatic needs, public and academic interest, the integrity of the location, age and condition, building design uniqueness, setting, construction materials, code requirements and available exceptions, and funding available through budget, grants, or gifts to the university. UConn has trained architects and historians on staff to monitor and recommend appropriate courses of action to perform restoration/maintenance/protective work as validated by review of the criteria.
PSM #7.2	Are there are circumstances in which demolition of a historic building would not be approved due to evidence of prior negligence? If so, how has it been determined that such circumstances don't exist in this case?	As described in the summary of alternatives as part of the public scoping meeting, the following alternatives were considered: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSM #7.3	How has the historic value of the house been assessed in dollars, and how does it compare to the cost of reconstruction?	While historical valuations of the property can be found on the Assessors Database (see: https://gis.vgsi.com/mansfieldct/Parcel.aspx?pid=1349), these valuations may not capture the full value of the historic property. As noted in the responses to PSM #8.1 and PSC #6.7, University Administration determined that the estimated costs to restore the entire structure were prohibitively more expensive than the cost to potentially salvage select individual elements of the buildings, demolish the building, and restore the site.

Comment Received from Laura Crow, 88 Hillyndale Road, Storrs, CT during the Public Scoping Meeting on July 25, 2023.		
Comment Number	Comment	Response
PSM #8.1	Won't be cheaper to restore as opposed to demolition?	The estimated costs to restore the entire structure are prohibitively more expensive than the cost to potentially salvage select individual elements of the buildings, demolish the building, and restore the site.
PSM #8.2	UConn does not have a gateway welcome house on this side of the campus.	Comment noted.
PSM #8.3	This house was initially owned by the Storrs family and was given to the Whitneys who used it as a school. They sold it to UConn for \$1.00 assuming that the university would value it. Just one small anecdote among many.	Comment noted.

Written Scoping Comments Received – July 3, 2023 – August 4, 2023

Comment Received from Susan Cyr via email on July 27, 2023.		
Comment Number	Comment	Response
PSC #1.1	PLEASE do not demolish the Whitney House. This building dates back to the early 1800's and should be preserved for the future. Historical buildings need to be restored and preserved for the future.	Comment noted.
PSC #1.2	Perhaps a museum of artifacts and history of the building and time period could be made.	UConn will coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) as alternatives are being considered.
PSC #1.3	Demolition of historical buildings is a tragedy.	Comment noted.

Comment Received from David Landry, Mansfield resident, via email on August 3, 2023.		
Comment Number	Comment	Response
PSC #2.1	Historic buildings not only reflect the evolution of local architecture, but they also reflect a willingness to value and protect the expression of craftspeople of the past, the art and design that they valued, and the sense of community they sought to build.	Comment noted.
PSC #2.2	UConn's determination that the house be demolished may be the most expedient resolution in the aftermath of the fire, but I believe it is shortsighted.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn has considered several alternatives as part of the CEPA process: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSC #2.3	In my opinion UCONN should see itself as a steward of its own history and make sure that the Whitney House stands into the next century.	Comment noted.
PSC #2.4	Repair and reuse of the building would be a positive reflection that UCONN values the historic contributions that the early families of Mansfield made in order for it to evolve into the modern university that it is today.	Comment noted.
PSC #2.5	If the demolition is to proceed, perhaps salvage of some useable segments of the Whitney House can live on as part of other historic homes.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn has considered the potential salvage of select individual building elements (where feasible) as part of the "Remove Building & Restore Site" alternative.
PSC #2.6	Even though much of an antique home can be rebuilt using modern materials, there is really no substitute for the authentic materials that still have value. I hope that UCONN will consider what it can reasonably do to continue to preserve its history.	Comment noted.

Comment Received from Xinyu Zhao, Associate Professor, Director of Graduate Studies School of Engineering at UConn, via email on August 2, 2023.		
Comment Number	Comment	Response
PSC #3.1	I have one year old who is going to UConn’s child lab. They routinely take these kids out for walks along RT 195 near the Whitney building. Because of the concerns of lead and asbestos, I personally don’t feel comfortable that the project would start early 2024.	Comment noted. Please see responses to CT DEEP ML #2, CT DEEP ML #4, and CT DEEP ML #5.
PSC #3.2	I wonder if it is possible to start the actual demolition in the summer when kids are not on campus.	Comment noted. Pending approvals, UConn plans to start work on the preferred alternative in early 2024. Please see responses to CT DEEP ML #2, CT DEEP ML #4, and CT DEEP ML #5.
PSC #3.3	Infants and toddlers are at a stage when they can be significantly impacted by environmental hazard. A later start time is also safer for our young students on campus too.	Comment noted. Please see responses to CT DEEP ML #2, CT DEEP ML #4, and CT DEEP ML #5.

Comment Received from Bob Shabot, Vice President, Willington Historical Society, via email on July 18, 2023.		
Comment Number	Comment	Response
PSC #4.1	With the pending demolition of the structure being planned, the Willington Historical Society would be interested in acquiring the structures iconic front entryway.	Comment noted. UConn will consider any potential abatement and salvage of select individual building elements as part of the scope of work for the demolition contract.
PSC #4.2	The Whitney entryway would be used to replace the front doorway on the ca. 1805 Glazier Tavern that the Society owns and operates as a House Museum, on the Town of Willington’s Town Green. The original tavern entrance was removed in the late 19th Century.	Comment noted.
PSC #4.3	For the last ten plus years the Society has worked with Preservation Connecticut and the State Historic Preservation Office (SHPO) on a number of projects to stabilize and restore the Glazier Tavern. The Society is continuously working forward on this process. Restoring the front entrance of the tavern would certainly move our restoration effort forward.	Comment noted.

Comment Received from Lynn Putnam Kask, 3 Agronomy Road, Storrs, CT, via email on August 2, 2023.		
Comment Number	Comment	Response
PSC #5.1	When the Whitney House burned I cried. It was my personal connection to the house and the historical connection that made me so sad. My mother, Vivian Putnam ran International House from that location. As a young adult I spent many hours there. My mother often spoke of how honored she was to be in	Comment noted.

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	such a beautiful spot and to also be able to use a historical location. She ran a very successful program providing service to the university.	
PSC #5.2	I do not understand why the house has not been used in so many years. Perhaps it was code issues, repairs or other rules that prevented usage. That is the tragedy because unwatched the real tragedy occurred.	Comment noted. The fire was caused by an electrical cable that failed and ignited building materials inside a wall. Indications of foul play were ruled out, and it was deemed accidental in nature.
PSC #5.3	The facade is fundamentally intact and there is opportunity to retain the historical facade and retrofit the interior into a useful building and make the Whitney House an asset to the University and town. I understand this would be a costly endeavor but there are times when money spent goes beyond construction costs. This is one of those times.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn considered the potential salvage of select individual building elements (where feasible) as part of the “Remove Building & Restore Site” alternative. “Repair/Restore Building” and “Salvage/Relocate Building” alternatives were also being considered as part of the CEPA process. UConn will consider any potential abatement and salvage of select individual building elements as part of the scope of work for the demolition contract.
PSC #5.4	The Whitney House is a very important historical building and one of the few buildings on campus that gives the University a context to its New England heritage. It is this history that never can be replaced once it is gone. Once it is demolished we can never get it back!	Comment noted.
PSC #5.5	I would like to make an analogy to another historical building that had a devastating fire. Notre Dame of course is a very important building in Paris. There is a big commitment to rebuilt and restore, I would like to suggest that the Whitney House to Storrs is also an important landmark that should be cherished and rebuilt.	Comment noted.
PSC #5.6	I repeat, because of the importance, the Whitney House must be rebuilt and the exterior facade returned to the original. The house sits in a scenic prime location. This creates a large opportunity for the University to repurpose and save a very important historical building.	Comment noted.
PSC #5.7	As a side note I always thought it would be the perfect spot to create a showcase of the University history. It could be used for incoming students, current students and faculty, and visitors with the mission to explain the long term excellence of the university.	Comment noted.
PSC #5.8	I implore you to reconsider its demolition.	Comment noted.

Comment Received from Alison Hilding, 17 Southwood Road, Storrs, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #6.1	Would demolition of the Whitney House enable widening of Storrs Road (Route 195) between the intersection of N Eagleville Road and Mansfield Road that otherwise would not be possible?	Storrs Road (SR-195) is a state road in the care, custody, and control of CTDOT. UConn is unaware of any plans CTDOT has for future road widening in the area adjacent to Whitney House or elsewhere through campus.
PSC #6.2	Within the past thirty years discussion has occurred and reoccurred regarding the potential to widen Storrs Road within the above-mentioned section.	Comment noted.
PSC #6.3	Does the current presence of the Whitney House in any way impact the potential for widening Storrs Road in this campus section? In this regard, does the existence of the house serve as a barrier to widening Storrs Road?	Please see response to PSC #6.1.
PSC #6.4	Are there any potential plans or is there any discussion in the long term for widening Storrs Road in this area? If so, this would be an example of segmented planning and therefore this possibility and potential consequence from the demolition of the Whitney House should be part of this Scoping process.	Please see response to PSC #6.1.
PSC #6.5	Surely widening Storrs Road in the middle of the UCONN campus and in the area of regional high school E O Smith would have potential traffic and environmental impacts. Traffic volume, pedestrian and vehicular safety (including UCONN and high school buses), as well as air quality would all be affected. I note that not only UCONN students cross Storrs Road in this greater area but also high school students from E O Smith High School who cross the road daily to access their athletic fields. The brook which sits just north of the Whitney House would be potentially affected also by widening Storrs Road. To my knowledge, UCONN still does not participate in regular air quality monitoring and reporting on campus. Changes in traffic patterns and volumes in this area could affect air quality. Student dorms and apartments line Storrs Road with windows open to road traffic exhaust.	Please see response to PSC #6.1.
PSC #6.6	Beyond its designation as part of UConn Historical District does the Whitney House, one of the oldest structures on campus, currently have other town, state, or federal historic designation?	Whitney House (also known as “International House” and “John Gilbert Jr. House”) is a contributing resource to the UConn Historic District, which has been listed in the National Register of Historic Places since 1988. It is not listed as a local resource, nor is it listed on the state register or the ConnCRIS mapper.
PSC #6.7	How was it decided that the property was “beyond reasonable repair”? Who made this decision? What was the basis of the decision?	UConn Administration determined the abatement and renovation necessary to preserve the contributing resource and safely occupy the structure was cost-prohibitive.
PSC #6.8	Were formal bids sought for its repair?	Formal bids from consultants were not procured for the repair of Whitney House. As mentioned in the response to PSC #6.7, UConn Administration determined that the abatement and renovation necessary to preserve the contributing resource and safely occupy the

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		structure was cost-prohibitive. In the interim, the structure has been stabilized using internal resources.
PSC #6.9	Was the building’s historical, aesthetic, architectural, and cultural value comprehensively considered or was this decision made on economics alone?	The importance of Whitney House as a contributing resource to the UConn Historic District (in the context of larger institutional goals that guide academics, experience, and campus growth) was considered in the review of alternatives.
PSC #6.10	A conscientious evaluation of the historical, aesthetic, cultural, architectural, and town value of the Whitney House should be included in the analysis and subsequent determination of whether to restore or destroy this building. Cost of rehabilitative/restorative construction needs to be evaluated in this historic, cultural, and aesthetic context. Simple economics based solely on the dollar cost of destruction or restoration alone is not sufficient when considering the future of an irreplaceable historic building.	Comment noted.
PSC #6.11	Alternatives need to be looked at as to why the building needs to be restored and what its value is as a historical and cultural resource. Additionally, potential functional use of the building should also be considered.	Comment noted.
PSC #6.12	Centrally located on campus this structure served for many years as a vibrant and active International House. I personally attended many pleasant functions there. Surely it could serve well for some other campus use in the future.	Comment noted.
PSC #6.13	The building itself is attractive, speaks clearly to our New England history and offers a pleasant aesthetic relief among the more institutional structures on campus. UCONN has done a nice job with color choices for the clapboard as well as the attractive blue tint of the shutters. I think the house is a little jewel in the center of the campus and adds a valuable historical reference. I enjoy walking and driving past it and I have, as stated above, spent many a pleasant afternoon and evening attending functions in it in years past.	Comment noted.
PSC #6.14	Part of this Scoping process should be an honest discussion by UCONN as to what its ultimate plans are for this property should the Whitney House be demolished and removed.	Pursuant to CGS § 22a-1 through 22a1-h RCSA § 22a-la-1 through 22a-la-12, UConn has published a post-scoping notice in the Environmental Monitor indicating its plans for the property and its decision on the preferred alternative.
PSC #6.15	The Great Lawn which sits to the north of the Whitney House and abuts Storrs Road is a signature aspect of the UConn campus and one of its most gracious and valued physical assets. It is my recollection that this sweeping lawn received some sort of protected status from the CT legislature years ago. Has this been researched or taken into consideration during evaluation of the disposition of the Whitney House?	The Great Lawn is a cultural landscape within the UConn Historic District, the impacts to which were taken into consideration as part of the assessment of alternatives.

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Comment Number	Comment	Response
PSC #6.16	Would removal or preservation of the Whitney House potentially affect the preservation or destruction of the Great Lawn?	Following abatement and demolition on the Whitney House property, any temporary impacts to the Great Lawn (e.g., site work and staging) will be restored to its previous condition.
PSC #6.17	Has there been any discussion of the role of the existence of the Whitney House in protecting the Great Lawn?	Please see response to PSC #6.15.
PSC #6.18	Are both the Great Lawn and the Whitney House part of a connected or integrated historic district?	While the Great Lawn is recognized by the University as a cultural landscape located within the UConn Historic District, it is not identified as a contributing resource to the District like Whitney House.
PSC #6.19	Does the Whitney House sit just outside of the designated Great Lawn?	Yes.
PSC #6.20	If the Whitney House were to be destroyed would its property be joined to the protected area of the Great Lawn?	Whitney House’s current location will remain within the existing boundary of the UConn Historic District. There are no plans to revise any portion of the District boundary at this time.
PSC #6.21	I urge you to consider the future and the aesthetic value of the Great Lawn in the context of the proposed Whitney House demolition – reviewing carefully the alternative of preserving the Whitney House for its own value as well as in the context its helping to preserve the future of the Great Lawn as it currently exists. The scenic value of the elegant sweep of lawn on the west side of Storrs Road from N Eagleville to Mirror Lake (including the Whitney House) is considerable and unique to the UCONN campus.	Comment noted.

Comment Received from Bruce Clouette, 483 Woodland Road, Storrs, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #7.1	I believe that the University’s proposal to demolish the Whitney House, as described in the Scoping Meeting of July 25, 2023, is insufficiently developed, and that a full Environmental Impact Evaluation (EIE) under the Connecticut Environmental Policy Act (CEPA) is called for.	Pursuant to CGS § 22a-1 through 22a1-h RCSA § 22a-la-1 through 22a-la-12, UConn determined an environmental impact evaluation (EIE) was not warranted for this Action. However, a team including professionals from University Planning, Design & Construction, the State Archeologist, UConn’s Environmental Programs Manager, UConn’s Hazardous Material Abatement & Code Correction Coordinator, and consultants will prepare abatement and demolition documents that address any unforeseen environmental concerns.
PSC #7.2	The comments of the Department of Energy and Environmental Protection were summarized at the Scoping Meeting. However, there was no indication that the project had been reviewed by the State Historic Preservation Office (SHPO) or that SHPO had transmitted any comments to the University. Since this is a case of the final loss of a National Register of Historic Places-listed	UConn coordinated with the State Historic Preservation Office (SHPO) regarding the proposed action and their comments are provided herein. UConn also submitted a Project Review Cover Form to SHPO in May 2023, prior to the Scoping period. A copy is available at https://updc.uconn.edu/whitney-house .

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	property, the public ought to have been informed of the position of this key review agency.	
PSC #7.3	The presentation made claims about the structural damage and excessive costs associated with restoration or repairs to the building, but no actual evidence was offered to back up these claims. Have technical studies been done to assess the damage and draw up cost estimates for the various alternatives, or are these claims just “seat of the pants” speculation?	The University relied upon its internal professional engineering expertise and its Fire Marshall & Building Inspector’s office in determining restoration and repairs to safely occupy the structure would be cost-prohibitive.
PSC #7.4	In order to be meaningful, any alternative analysis should include an appropriate range of possibilities, yet the most obvious (to me) alternative was not even mentioned: selective demolition of the most seriously damaged portion, the later rear ell, and repair and adaptive re-use of the more historic and publicly visible portion of the building.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn has considered several alternatives as part of the CEPA process: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSC #7.5	I came to UConn in 1971 for graduate study, earned my degree, occasionally taught as an adjunct, and have been a proud alumnus for 50 years. I remember the Whitney House as an elegant, well-preserved, active facility; on one occasion, I and other graduate students met the internationally renowned poet Stephen Spender there when he came to campus for a reading.	Comment noted.
PSC #7.6	I would like to compliment the University and the consultant, Fuss & O’Neill, for the clarity and objectivity of the Scoping Meeting, especially for making it clear that the building is significant as a contributing building within a listed historic district and that the neglect of the building began almost twenty years ago, when it was taken out of use (rather than being unpredictable “accidents,” fires like the one that occurred in January are all too common in underutilized or abandoned buildings).	Comment noted. To clarify, what was stated in the public scoping meeting on July 25, 2023, was that the building was “vacated without a useful purpose since 2004.”
PSC #7.7	Throughout the presentation, there was the sense that the adaptive re-use of an historic building is somehow antithetical to the mission of an institution of higher learning. A cursory look at nearby colleges and universities, however, suggests the opposite. Smith House, an 1890s Victorian dwelling, is used by Trinity College for visiting faculty and for arts programs. Connecticut College in New London initially planned to demolish the Winslow Ames House, a notable 1930s Mid-Century Modern prefab, but instead abated its asbestos exterior, restored the original windows, and re-purposed it as offices for the Center for Art and Technology. Closer to home, Eastern Connecticut State University occupies several restored Victorian houses within the Prospect Hill Historic District. The list goes on, but suffice to say, UConn is an outlier when it comes to making good use of historic buildings. But why should UConn be in last place?	Comment noted.

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PSC #7.8	In the short term, I look forward to the University's responses to these and other Post-Scoping comments as required by CEPA regulations (Sec. 22a-1a-7). My longer term hope, however, is that the preparation of an EIE will point a path to the adaptive re-use of at least the front part of the Whitney House.	Comment noted. Please see response to PSC #7.1.

Comment Received from Brian Bartizek, Resident, Eastern CT, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #8.1	As a UConn alumni and eastern CT resident, I strongly urge you to delay demo. and allow a licensed and insured contractor skilled in antique materials remove all the period features.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn has considered the potential salvage of select individual building elements (where feasible) as part of the "Remove Building & Restore Site" alternative.
PSC #8.2	I would prefer that UConn repair it in place , but I guess after spending all that money on football and a hockey rink, that is too much to ask.	Comment noted.

Comment Received from Stephen C Marshall, 1346 South Street, Coventry CT, via email on August 3, 2023.		
Comment Number	Comment	Response
PSC #9.1	Is there a published report, Condition Assessment and possibly a fire Marshall's report available for review on the current structures post fire conditions?	A Fire Investigation – Origin and Cause Report is available on the project information website at https://updc.UConn.edu/whitney-house . Inquiries and requests to view and or copy documents, pursuant to the Freedom of Information Act, may be submitted to: https://publicrecords.UConn.edu/make-a-request/ .
PSC #9.2	What I see from the provided photos is total loss of the roof structure in the Ell and only smoke damage in the photo of the front room. On a "drive by" the structure (Main House) looks quite remarkably square and true given its age. There certainly is much left to salvage here speaking from 48 years of experience.	Comment noted.
PSC #9.3	The Town of Coventry, right next door had a similar era building known as Caprilands Herb Farm on Silver Street that was in deplorable condition from over 20 years of vacancy much like this building. Caprilands has been disassembled and moved off site to be reassembled elsewhere. Without setting foot inside I would say the Whitney house (front main structure) is a	Comment noted.

Comment Received from Stephen C Marshall, 1346 South Street, Coventry CT, via email on August 3, 2023.		
Comment Number	Comment	Response
	likely Candidate for the same situation if careful consideration for on site rehabilitation has been exhausted.	
PSC #9.4	There's but a few examples of Mansfield's early built heritage left as one drives through Campus. It will be a significant loss to the character of Mansfield. I urge the committee to step back, stop the clock, and look at the cultural resources left and count this as one worthy of Rehabilitation.	Comment noted.
PSC #9.5	I would like to request a extension for public comment to be extended for 30 days considering we are in the middle of prime vacation time. This is exactly why I am putting forth a eleventh hour request for such, I just flew in from the opposite end of the country last night.	Pursuant to CGS § 22a-1 through 22a1-h RCSA § 22a-la-1 through 22a-la-12, UConn complied with the CEPA requirements related to public comment periods and opened a public comment period from July 3, 2023 to August 4, 2023.

Comment Received from David A. Schump, a.k.a. The Art Tramp, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #10.1	Please save the Whitney house and do the Rehabilitation/salvage. needed to keep this treasure.	Comment noted.

Comment Received from Victoria Mitchell via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #11.1	I wanted to express my feelings that the Whitney house should be restored and not demolished. It's a piece of history and more beautiful than anything that would be built in its place.	Comment noted.

Comment Received from Michael Emmons, UConn History MA, 2004, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #12.1	I am a UConn alum who is now an architectural historian and professor of historic preservation. I write to ask that the administration reconsider the demolition of the historic Whitney house on the UConn campus.	Comment noted.
PSC #12.2	Simply put, the Whitney house is a rare survival in Storrs, a 200+ year old building that embodies the history of Mansfield and of the university. Driving down Rt 195, it's one of the few historic structures that remains to tell the deeper history of the area UConn now dominates.	Comment noted.

Comment Received from Michael Emmons, UConn History MA, 2004, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #12.3	I know the literature suggests this structure is damaged "beyond repair," but I've often seen that claim for historic structures that retain a substantial amount of a material integrity and an ability to be rehabilitated.	Comment noted.
PSC #12.4	I hope the university is considering all options, even creative ones, to ensure that UConn is a responsible steward of our history and culture in Connecticut.	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn has considered several alternatives as part of the CEPA process: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.

Comment Received from Ann Galonska, Museum Director of the Mansfield Historical Society, 47 Shanda Lane, Tolland, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
PSC #13.1	I am so discouraged that yet another of the University's historic landmarks may soon be lost. Despite the fire damage, I feel that some attempt should be made to save the Whitney house. It has such a significant history.	Comment noted.
PSC #13.2	Would it be possible to restore the main house?	UConn has considered several possible alternatives as part of the CEPA process: (1) No Action; (2) Repair/Restore Building; (3) Salvage/Relocate Building; (4) Remove Building & Restore Site.
PSC #13.3	It appears that most of the fire damage is in the rear addition that is not original to the structure. That section could be removed without affecting the historical integrity of the house.	Comment noted.
PSC #13.4	If the main building's structure hasn't been too compromised, smoke and water damage can be rectified. However, if the house is indeed beyond repair, I hope that its history can at least be recognized in some manner. I would expect formal state-level documentation of the structure, including a summary of existing historical research, past photographs of the house, and photographs of its current condition. In addition, some sort of interpretive marker at the site would be appropriate.	UConn will coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) as alternatives are being considered.
PSC #13.5	This house and the Whitney family that occupied it have a long and interesting history, part of which is intimately connected to the founding of the university. The house is one of the oldest buildings on campus. It was built sometime between 1802 and 1807 by John Gilbert, Jr. The house and its associated 30-acre property were owned the Gilbert family until 1859. After changing hands a few times, the property was then acquired by Augustus Storrs in 1867. Not long after, he sold it to Minerva Whitney who was in dire need of a place to live. In 1866, her husband, Edwin Whitney, had donated their entire property, including a newly built boarding school and their 50 acre farm, to the State of	Comment noted.

Comment Received from Ann Galonska, Museum Director of the Mansfield Historical Society, 47 Shanda Lane, Tolland, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
	<p>Connecticut to serve as the site of the Connecticut Soldiers' Orphans' Home. Mr. and Mrs. Whitney served as the Orphans' Home's first superintendent and matron. Less than a year later, in August 1867, an epidemic broke out in the orphanage, sickening most of the residents. Edwin Whitney, his 11-month-old daughter, and two of the orphans died. The pregnant Mrs. Whitney also fell ill but survived.</p> <p>Following the death of her husband, Minerva Whitney had to find a new home for herself, her elderly father, and her soon-to-be born child. They had to leave the Orphans' Home to make way for the new superintendent and matron. Augustus Storrs offered the former Gilbert house to them and on November 25, 1867, Minerva Whitney purchased the property. Just three months later, she gave birth to a daughter whom she named Edwina after her late husband. The Connecticut Soldier's Orphans' Home continued to operate into the spring of 1875. By that time most of the Civil War orphans had reached the age limit for state support and the facility then closed. Over its nine years of operation, the orphanage had provided care and education for 153 children. Upon its closure, the building and its farmland reverted to Edwin Whitney's widow, in accordance to the terms of his agreement with the state.</p> <p>Minerva Whitney was now the owner of a large mothballed orphanage for which she had no use. In May of 1878, she sold the property to Augustus Storrs. The former orphans' home and its associated 50 acres were part of the property that Augustus Storrs later offered to the State of Connecticut to establish the Storrs Agricultural School. His brother, Charles added \$5,000 in seed money. Their gift was accepted on April 21, 1881 and the future University of Connecticut was born.</p> <p>The former orphans' home became the first building of the new Storrs Agricultural School. It was renamed Whitney Hall after Edwin Whitney. At various times, it housed classrooms and laboratories and served as student and faculty living quarters. It was torn down in 1932. Today its site is marked with a plaque near the intersection of North Eagleville Road and Route 195. Minerva Whitney and her daughter Edwina lived in the former Gilbert house for just over 50 years. From 1888 through 1900, the Storrs branch of the Eagleville post office was also located in the Whitney's home and Minerva Whitney served as postmistress.</p>	

Comment Received from Ann Galonska, Museum Director of the Mansfield Historical Society, 47 Shanda Lane, Tolland, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
	<p>In 1900, Edwina Whitney was appointed librarian of the Connecticut Agricultural College. She held this position for 34 years. During part of this time, she also taught German, English, and American literature. Throughout her adult life, she was much involved in both campus and community activities that she chronicled in her diaries. Those are now in the collection of the Mansfield Historical Society. A dormitory was named in her honor in 1938.</p> <p>By the early 1900s, the Connecticut Agricultural College had so grown that more land was needed for expansion. The Whitney property then became much desired. After several years of wooing and negotiation, Minerva Whitney finally agreed to sell her property to the State of Connecticut for use by the college. On March 9, 1918, for the sum of one dollar and other considerations, she conveyed to the state four tracts of land and the buildings thereon. She reserved for herself a small parcel in the area then known as Faculty Row. The state agreed to build a new dwelling on this site for her and her daughter at no cost to them. As part of the agreement, the road there was to be forever named Whitney Road, in honor of Edwin Whitney. Ironically, this house was among the former Faculty Row houses that were demolished in 2017.</p> <p>After Minerva and Edwina Whitney moved to their new home on Faculty Row, their old house was divided into two apartments and was used for faculty housing. In 1964, it was refurbished to become the International House. It served this purpose for over two decades. Afterwards, in 1999, the Whitney house became the temporary quarters of the Rainbow Center that serves UConn's LGBTQ+ community. The center relocated to the Student Union in 2004.</p> <p>For the next 19 years, the Whitney house stood empty and received minimal maintenance.</p>	
PSC #13.6	<p>It's unfortunate that another use could not be found for the building. A vacant building is always an invitation for disaster. It's not surprising that catastrophe finally struck and the Whitney house caught fire. It's a sad ending to its long and significant history.</p>	Comment noted.
PSC #13.7	<p>The University has a poor record when it comes to stewardship of the historic buildings within its boundaries. A prime example is the 18th century Farwell house that once stood at the crest of Horsebarn Hill. By the 1970s, it had fallen into a sad state of disrepair and University officials deemed it too costly to repair. On November 27, 1976, the house was burned as part of a fire training exercise. Twelve area fire departments took part in the drill. Within a few</p>	Comment noted.

Comment Received from Ann Galonska, Museum Director of the Mansfield Historical Society, 47 Shanda Lane, Tolland, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
	hours, the house that had stood for over 220 years was gone and a firestorm of public protest was ignited. The burning of the Farwell House was met with immediate public outrage and protest. Members of the Mansfield Historical Society were among the many who deplored the destruction of the 18th century Farwell house.	
PSC #13.8	The Society formed a committee and a series of resolutions were prepared and sent to the University administration. They recommended that the University adopt a preservation policy and that an inventory be made of all significant architecture, historic sites and scenery. They also called for the Board of Trustees to appoint a review board to consider all proposed development, renovation, or demolition of the inventoried structures, sites and places. Not all of these recommendations were adopted, but the University had been put on notice that its historic buildings were valued and that the public wanted them preserved.	Comment noted.
PSC #13.9	In 1989, a University of Connecticut Historic District was established and listed on the National Register of Historic Places, with the Whitney House identified as a contributing building within the district. The University also adopted a Historic Preservation and Adaptive Reuse Plan in 2015 as part of its Master Plan. However neither of these actions guarantee preservation of the University's historic buildings. In fact, the Master Plan indicates that not all of the contributing historic buildings within the designated historic districts are expected to remain in the future. If you look at the plan, you'll see that several historic buildings on the main campus and Depot campus have been identified for future removal or relocation. Part of the plan was already implemented in 2017 when most of the former Faculty Row houses were demolished. In 2021, several outbuildings at Spring Manor Farm, another UConn property, were also torn down after they had deteriorated beyond repair.	Comment noted.
PSC #13.10	It is my hope that both the town and university communities will continue to advocate for their historic resources. It will take the voices of many to prevent further loss of Mansfield's and the University's heritage as expressed in the built environment.	Comment noted.
PSC #13.11	It can be done, as evidenced by the restoration of the Farwell-Jacobson Barn in 2003. It was saved through the efforts of a citizen's action group, known as the Coalition to Save Horsebarn Hill. In 1999, they mounted a campaign to stop construction of a Pfizer research facility on Horsebarn Hill Road that would have altered the historic agricultural landscape. As part of their strategy, they	Comment noted.

Comment Received from Ann Galonska, Museum Director of the Mansfield Historical Society, 47 Shanda Lane, Tolland, CT, via email on August 4, 2023.		
Comment Number	Comment	Response
	<p>succeeded in getting the Farwell-Jacobson barn and its surrounding 25 acres listed on the National Register of Historic Places. After the Pfizer project was abandoned, citizens continued to push for restoration of the dilapidated barn.</p> <p>Plans were made to install temporary tarps over the roof to prevent further damage before restoration. When this had not been done a year later, a community group called Friends of the Farwell Barn took matters into their own hands. With contributions from local citizens, alumni and area merchants, they purchased a tarp and arranged for its installation on July 28, 2001. Restoration of the barn was finally completed by Kronenberger & Sons Restoration, Inc. in 2003. The barn is now a beloved landmark at the north entrance to campus and is a popular backdrop for UConn graduates and E.O. Smith prom-goers to take photos.</p>	
PSC #13.12	<p>The relocation and reconstruction of the Ash house is another success story. In the fall of 1999, the University planned to demolish a 275-year-old house that it owned, known as the Ash House. It was among Mansfield's oldest houses, dating to between 1742 and 1752. The house had been used as a rental property and then stood empty for a number of years, falling into severe disrepair.</p> <p>A group of historically minded citizens convinced the University to auction the house rather than demolish it. A local couple, Greg and Emine Cichowski, were successful in purchasing it, with the understanding that they would have to move it. They successfully dismantled the house and over the course of several years rebuilt it on a nearby tract of land on Old Turnpike Road. It has been beautifully restored.</p>	Comment noted.
PSC #13.13	<p>There are still other threatened historic buildings on campus and throughout Mansfield. I hope that the community will remain vigilant and continue to speak out for preservation as needed.</p>	Comment noted.

Mansfield Town Council and Planning and Zoning Commission provided written scoping comments from Jennifer Kaufman, dated July 31, 2023.		
Comment Number	Comment	Response
MTC/PZC #1.1	<p>While the Town of Mansfield has no jurisdiction over the University of Connecticut Historic District, it should be noted that Goal 4.1 of the Mansfield Tomorrow Plan of Conservation and Development states "Mansfield honors</p>	Comment noted.

Mansfield Town Council and Planning and Zoning Commission provided written scoping comments from Jennifer Kaufman, dated July 31, 2023.		
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	and preserves its historic resources by protecting them for future generations.”	
MTC/PZC #1.2	Further, the 2015 UConn Campus Master Plan, states that long-term stewardship of campus heritage is an important goal and one worthy of full consideration and implementation by the University.	Comment noted.
MTC/PZC #1.3	Demolition of Whitney House will remove a prominent historic structure from State Route 195 which runs through UConn and serves as a gateway to Downtown Storrs traveled by both Mansfield residents and visitors throughout the region.	Comment noted.
MTC/PZC #1.4	As the Whitney House is a contributing resource to the University Historic District designated in 1989 and is listed on the National Register of Historic Places, as well as on the State of CT Register, the University is urged to prioritize the care and preservation of historic properties.	Comment noted.
MTC/PZC #1.5	If the structure is to be demolished, the University is strongly encouraged to follow appropriate decommissioning and salvaging procedures as defined by the State Historic Preservation Office (SHPO) so that historic resources are preserved.	UConn will coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building’s history and its physical footprint) as alternatives are being considered.
MTC/PZC #1.6	In addition, all measures to prevent erosion and sedimentation of Mirror Lake should be implemented.	If the structure is demolished, UConn will use appropriate erosion and sediment controls, consistent with the <i>2002 Connecticut Guidelines for Soil Erosion and Sediment Control (as amended)</i> and the <i>General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities</i> .
MTC/PZC #1.7	Moving forward, the Town urges the university to prioritize the care and maintenance of contributing historic buildings in the planning and budgeting process as detailed in the guidelines established in section 4.2.2 of UConn’s Historic District: Evaluation and Process (October 2016 and revised to January 2017) as they impact important historical resources for the Town of Mansfield.	Comment noted.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
CT DEEP ML #1	The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. This site is located in a Natural Diversity Database Area and a Request for NDDB State-listed Species Review can be completed online using DEEP’s ezFile Portal, which can be found on DEEP’s website for NDDB Environmental Reviews.	Comment noted. Prior to the public scoping meeting, an NDDB request was submitted by UConn on Friday, July 21, 2023. UConn received a determination from DEEP on July 24, 2023 of no anticipated negative impacts to State-listed species resulting the proposed project.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
CT DEEP ML #2	The Remediation Division has no immediate concerns with this proposed project, which aims to decrease hazards and liabilities with the current state of the structure. The Remediation Division's case management database shows that UConn is or has been enrolled in a number of remediation programs. Therefore, caution should be given to site surroundings to ensure the work done does not impede or compromise any other remedial work, engineered controls, environmental use restrictions, etc. at the site. All debris, waste and any necessary characterization should be handled in accordance with all applicable state and local codes.	Comment noted. Contractors will be required to comply with requirements for construction-related hazardous materials and solid waste in UConn's <i>Contractor EHS Manual: Environmental, Health, and Safety (EHS) Requirements for Construction, Service, and Maintenance Contractors</i> , including reference to such requirements in contract documents. Construction-related solid waste will be handled and disposed of in a manner that meets current regulations and University standards. Construction and demolition debris will be managed in accordance with applicable state and federal regulations and the University's contractor policies. Hazardous or regulated materials or subsurface contamination encountered during construction will be characterized and disposed of in accordance with applicable state and federal regulations.
CT DEEP ML #3	This facility is next to Mirror Lake and Roberts Brook (the latter which has a water quality assessment of Not Supporting Aquatic Life). The University has been planning a Mirror Lake impoundment and dam reconstruction project which may improve water quality to the impoundment and the Brook. The proposed demolition should consider appropriate coordination with sediment and erosion control and stormwater quality management measures to protect the water resources of the current impoundment and the Brook. A carefully demolished and stabilized site may provide additional watershed/littoral resource protection and associated habitat enhancement into a modified dam reconstruction and lake restoration project.	Comment noted. UConn will require the use of appropriate erosion and sediment controls during any construction/demolition activities consistent with the <i>2002 Connecticut Guidelines for Soil Erosion and Sediment Control (as amended)</i> and the <i>General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities</i> .
CT DEEP ML #4	DEEP administers the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos (at 40 CFR 61.140, et seq.) on property subject to permitting under Title V of the Clean Air Act. Prior to undertaking a regulated demolition or renovation operation, the owner or operator is required to thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos. Note that the asbestos NESHAP also applies on properties not subject to permitting under Title V of the Clean Air Act; however, on such properties, the requirements of this regulation are administered exclusively by EPA	Comment noted. Prior to undertaking any regulated demolition of the building, UConn will thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos. As noted in an earlier response (see PSM #1.5), UConn has already conducted a preliminary asbestos analysis of the building debris.
CT DEEP ML #5	The owner or operator is required to notify DEEP, as well as the U.S. Environmental Protection Agency (EPA), at least 10 working days before asbestos stripping or removal work or any other regulated activity begins. Notification is required at least 10 working days before a regulated demolition	Comment noted. In keeping with the stated requirements, UConn will notify DEEP as needed.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
	operation begins irrespective of the presence of asbestos. Additional work practice requirements may apply depending on the amount and type of asbestos present.	
CT DEEP ML #6	The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal.	Comment noted. Please see response to CT DEEP ML #2.
CT DEEP ML #7	Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g. contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils.	Comment noted.
CT DEEP ML #8	Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at Demolition Debris.	Comment noted.
CT DEEP ML #9	Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible.	Comment noted. Please see response to CT DEEP ML #2.
CT DEEP ML #10	Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. Pursuant to section 22a-241a of the CGS, the state set a goal of 60% rate of diversion from disposal for municipal solid waste by the year 2024 and adopted that goal in the state's December 2016 Comprehensive Materials portal.ct.gov/DEEPManagement Strategy. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut.	Comment noted.
CT DEEP ML #11	DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling.	Comment noted. Please see response to CT DEEP ML #2.
CT DEEP ML #12	If abatement is required for asbestos containing materials (ACM), these materials are regulated as a "special waste" in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these	Comment noted. Please see response to CT DEEP ML #2.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
	materials may only be disposed of at facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities.	
CT DEEP ML #13	<p>Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (i.e., paint, roofing, flooring, insulation, etc.). EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure.</p> <p>Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors, roofs, ventilation, etc.) and demolition projects, whenever possible. However, the continued use of such PCB materials is prohibited and, where it is identified, it must be addressed.</p> <p>EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP.</p>	<p>Comment noted. In keeping with UConn's <i>Contractor EHS Manual: Environmental, Health, and Safety (EHS) Requirements for Construction, Service, and Maintenance Contractors and PCB Management Plan</i>, contractor must remove and dispose of any PCB-containing materials (confirmed or presumed) in accordance with all applicable Federal and State statutes/regulations and any project specific specifications/remedial plans. Contractors shall not perform sampling of any building materials for PCB content unless specifically authorized to do so by the UConn Project Representative in consultation with UConn EHS. And as renovation and demolition projects that may impact caulks, glazing, and other joint sealants in a building constructed or renovated between 1950 and 1979 are planned, sampling and abatement strategies will be based upon the types and quantities of impacted building materials, the age of the building or history of renovations, as well as scope and magnitude of the renovation or demolition. EHS must be consulted in connection with any such project prior to any proposed disturbance or sampling of caulk, glazing or sealant that could contain PCBs.</p>
CT DEEP ML #14	In addition to asbestos and PCBs, demolition debris may also be contaminated with lead-based paint, chemical residues, or other materials that require special disposal.	Comment noted.
CT DEEP ML #15	Deconstruction, an environmentally friendly alternative to demolition, should be utilized in order to salvage as many of the reusable materials as possible, diverting them from the waste stream. Salvaged items typically include doors,	Comment noted. As described in the summary of alternatives as part of the public scoping meeting, UConn is considering the potential salvage

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
	windows, cabinets, lighting and plumbing fixtures, framing lumber, roofing materials, and flooring.	of select individual building elements (where feasible) as part of the "Remove Building & Restore Site" alternative.
CT DEEP ML #16	The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable 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. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices.	Comment noted. Please see response to CT DEEP ML #3.
CT DEEP ML #17	The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable projects (projects primarily by private developers).	Comment noted.
CT DEEP ML #18	Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form and SWPCP to the Department at least 60 days prior to the initiation of construction. Registrations shall include a	Comment noted.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated August 3, 2023.		
Comment Number	Comment	Response
	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.	
CT DEEP ML #19	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.	Comment noted.
CT DEEP ML #20	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.	Comment noted.
CT DEEP ML #21	Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.	Comment noted. Please see response to PSC #6.5.

The State of Connecticut State Historic Preservation Office provided written scoping comments from Jonathan Kinney, State Historic Preservation Officer, dated August 7, 2023.		
Comment Number	Comment	Response
SHPO #1	SHPO understands that the Whitney House was damaged by fire and water earlier this year and that the University of Connecticut (UConn) Building Official, pursuant to State Building Code §116, concluded that the building is unsafe. As a result, SHPO does not object to its proposed demolition, but we do regret the continued loss of significant historic features associated with the UConn Historic District - Connecticut Agricultural School, a property listed on the National Register of Historic Places.	Comment noted.
SHPO #2	As one of the oldest buildings at UCONN, constructed during the early 19th century, the Whitney House was a significant remnant of the original historic campus.	Comment noted.
SHPO #3	While the demolition of the Whitney House can proceed without causing substantial ground disturbance, an archaeological reconnaissance should be completed, if plans to redevelop the house lot are developed in the future.	Comment noted. UConn does not anticipate substantial subsurface disturbance or the future redevelopment of the Whitney House lot at this time.
SHPO #4	Although this office recognizes that UCONN did not deliberately cause the fire, the loss of the Whitney House does constitute a substantial loss to the UCONN Historic District – Connecticut Agricultural School.	Comment noted.
SHPO #5	Many universities and colleges across the US use the historic nature of their campuses to help entice new students, who enjoy the character of the historic buildings and landscapes.	Comment noted.
SHPO #6	To prevent the further loss of historic buildings on the campus, SHPO would be happy to work collaboratively with UCONN compensate for this loss, SHPO recommends that UCONN devote resources and/or take actions to preserve the iconic dairy barn, another significant historic asset along Storrs Road that conveys the University’s agricultural heritage and is in need of preservation work.	Comment noted.
SHPO #7	Because SHPO is not fully aware of any actions taken to date on the dairy barn, our office would appreciate additional consultation to determine what actions are appropriate and should be undertaken. These may include, but are not limited to, a structural analysis or conditions assessment; stabilization efforts; a rehabilitation plan; and/or a plan for reuse.	Comment noted. UConn will contact SHPO regarding this topic.

Attachment

Summary of Public Comments and Responses

From: Dave Landry <davidhlandry@icloud.com>

Sent: Thursday, August 3, 2023 9:12 AM

To: Libby, James <james.libby@uconn.edu>

Subject: Public comment / Whitney House

David Landry

937 Storrs Road

Storrs CT 06268

August 3, 2023

Attention James Libby

My name is David Landry, I have been a resident of Mansfield since 2005. My home is on the national register of historic places and marks the southern border of the Springhill Historic District. As an owner of a historic home I see myself as its current caretaker and that my responsibility is to do as much as possible to make sure this structure lives beyond my ownership. Historic buildings not only reflect the evolution of local architecture, but they also reflect a willingness to value and protect the expression of craftspeople of the past, the art and design that they valued, and the sense of community they sought to build.

The tragic fire at the Whitney House this past January was certainly an unfortunate event. UCONN'S determination that the house be demolished may be the most expedient resolution in the aftermath of the fire, but I believe it is shortsighted. In my opinion UCONN should see itself as a steward of its own history and make sure that the Whitney House stands into the next century. Repair and reuse of the building would be a positive reflection that UCONN values the historic contributions that the early families of Mansfield made in order for it to evolve into the modern university that it is today. If the demolition is to proceed, perhaps salvage of some useable segments of the Whitney House can live on as part of other historic homes. Even though much of an antique home can be rebuilt using modern materials, there is really no substitute for the authentic materials that still have value. I hope that UCONN will consider what it can reasonably do to continue to preserve its history.

Thank you David Landry

----- David Landry C: (860) 593-7146 937 Storrs Road Storrs CT 06268 www.dhlandry.com

From: Willington Historical Society <willingtonhistoricalsociety@gmail.com>

Sent: Tuesday, July 18, 2023 2:17 PM

To: Libby, James <james.libby@uconn.edu>

Subject: Scoping for the Whitney House

Mr. Libby

Concerning the pending scoping of the Whitney House on the UConn campus.

With the pending demolition of the structure being planned, the Willington Historical Society would be interested in acquiring the structures iconic front entryway.

The Whitney entryway would be used to replace the front doorway on the ca. 1805 Glazier Tavern that the Society owns and operates as a House Museum, on the Town of Willington's Town Green. The original tavern entrance was removed in the late 19th Century.

For the last ten plus years the Society has worked with Preservation Connecticut and the State Historic Preservation Office (SHPO) on a number of projects to stabilize and restore the Glazier Tavern. The Society is continuously working forward on this process. Restoring the front entrance of the tavern would certainly move our restoration effort forward.

Any suggestions you may have to help with the doorway acquisition would be greatly appreciated.

Best Regards.

Bob Shabot, Vice President
Willington Historical Society
774-452-4772 (cell)

-----Original Message-----

From: Al Cyr <breezyacresllc@earthlink.net>

Sent: Thursday, July 27, 2023 2:15 PM

To: Libby, James <james.libby@uconn.edu>

Subject: Demolition of Whitney House

Message sent from a system outside of UConn.

PLEASE do not demolish the Whitney House. This building dates back to the early 1800's and should be preserved for the future. Historical buildings need to be restored and preserved for the future. Perhaps a museum of artifacts and history of the building and time period could be made.
Demolition of historical buildings is a tragedy.

Susan Cyr

From: Kask <kask@redshift.com>

Date: August 2, 2023 at 11:29:16 AM EDT

To: jameslibby@uconn.edu

Cc: president@uconn.edu, moranA@mansfield.org, jennifer.kaufman@mansfield.org

Subject: Whitney House

Whitney House
Route 195 (adjacent to Mirror Lake)
University of Connecticut
Storrs, Connecticut

James Libby, Senior Project Manager
University Planning, Design, and Construction
3 Discovery Drive
U-6038
Storrs, Connecticut
06269

Cc: Radenka Maric
Toni Moran
Jennifer Kaufman

Dear Mr Libby;

When the Whitney House burned I cried. It was my personal connection to the house and the historical connection that made me so sad. My mother, Vivian Putnam ran International House from that location. As a young adult I spent many hours there. My mother often spoke of how honored she was to be in such a beautiful spot and to also be able to use a historical location. She ran a very successful program providing service to the university.

I do not understand why the house has not been used in so many years. Perhaps it was code issues, repairs or other rules that prevented usage. That is the tragedy because unwatched the real tragedy occurred. Fire

The facade is fundamentally in tact and there is opportunity to retain the historical facade and retrofit the interior into a useful building and make the Whitney House an asset to the University and town. I understand this would be a costly endeavor but there are times when money spent goes beyond construction costs. This is one of those times.

The Whitney House is a very important historical building and one of the few buildings on campus that gives the University a context to its New England heritage. It is this history that never can be replaced once it is gone. Once it is demolished we can never get it back!

I would like to make an analogy to another historical building that had a devastating fire. Notre Dame of course is a very important building in Paris. There is a big commitment to rebuilt and restore, I would like to suggest that the Whitney House to Storrs is also an important landmark that should be cherished and rebuilt.

I repeat, because of the importance, the Whitney House must be rebuilt and the exterior facade returned to the original. The house sits in a scenic prime location. This creates a large opportunity for the University to repurpose and save a very important historical building. As a side note I always thought it would be the perfect spot to create a showcase of the University history. It could be used for incoming students, current students and faculty, and visitors with the mission to explain the long term excellence of the university.

I send this letter in memory of my mother. I have tried to express what she would have said at this critical time. She was very proud to work in a location with such history.

I implore you to reconsider its demolition.

Sincerely,

Lynn Putnam Kask
3 Agronomy Road
Storrs, Connecticut 06268

kask@redshift.com

Sent from my iPhone

From: Zhao, Xinyu <xinyu.zhao@uconn.edu>
Sent: Wednesday, August 2, 2023 3:30 PM
To: Libby, James <james.libby@uconn.edu>
Subject: regarding demolition of the Whitney building

Dear James,

I am a faculty member from Mechanical Engineering, and I hope to express my concern over the project timeline. Unfortunately I wasn't able to call in on July 25 and hope this email can convey the message fine.

I have one year old who is going to UConn's child lab. They routinely take these kids out for walks along RT 195 near the Whitney building. Because of the concerns of lead and asbestos, I personally don't feel comfortable that the project would start early 2024. I wonder if it is possible to start the actual demolition in the summer when kids are not on campus. Infants and toddlers are at a stage when they can be significantly impacted by environmental hazard. A later start time is also safer for our young students on campus too.

Please let me know if you have any comments. Looking forward to your reply.

Best regards,

Xinyu Zhao
Associate Professor
Director of Graduate Studies School of Engineering

-----Original Message-----

From: Victoria Mitchell <victoriannemitchell@gmail.com>

Sent: Friday, August 4, 2023 3:22 PM

To: Libby, James <james.libby@uconn.edu>

Subject: Save the Whitney House

Message sent from a system outside of UConn.

To whom it may concern,

I wanted to express my feelings that the Whitney house should be restored and not demolished. It's a piece of history and more beautiful than anything that would be built in its place.

Thanks,

Victoria Mitchell

Sent from my iPhone

Comments on the Proposed Demolition of the Whitney House

Ann Galonska
47 Shanda Lane
Tolland, CT 06084

I am the museum director of the Mansfield Historical Society. Many of our members have expressed their dismay over the proposed demolition and have urged me to file comments in response to the recent Scoping Meeting. However, the Society's Board has not yet met on this issue, so for now these comments must remain those of a concerned citizen and UConn alum. When the Board has a chance to discuss the issue in depth, we may transmit an additional statement.

I am so discouraged that yet another of the University's historic landmarks may soon be lost. Despite the fire damage, I feel that some attempt should be made to save the Whitney house. It has such a significant history. Would it be possible to restore the main house? It appears that most of the fire damage is in the rear addition that is not original to the structure. That section could be removed without affecting the historical integrity of the house. If the main building's structure hasn't been too compromised, smoke and water damage can be rectified. However, if the house is indeed beyond repair, I hope that its history can at least be recognized in some manner. I would expect formal state-level documentation of the structure, including a summary of existing historical research, past photographs of the house, and photographs of its current condition. In addition, some sort of interpretive marker at the site would be appropriate.

This house and the Whitney family that occupied it have a long and interesting history, part of which is intimately connected to the founding of the university. The house is one of the oldest buildings on campus. It was built sometime between 1802 and 1807 by John Gilbert, Jr. The house and its associated 30-acre property were owned the Gilbert family until 1859. After changing hands a few times, the property was then acquired by Augustus Storrs in 1867. Not long after, he sold it to Minerva Whitney who was in dire need of a place to live.

In 1866, her husband, Edwin Whitney, had donated their entire property, including a newly built boarding school and their 50 acre farm, to the State of Connecticut to serve as the site of the Connecticut Soldiers' Orphans' Home. Mr. and Mrs. Whitney served as the Orphans' Home's first superintendent and matron. Less than a year later, in August 1867, an epidemic broke out in the orphanage, sickening most of the residents. Edwin Whitney, his 11-month-old daughter, and two of the orphans died. The pregnant Mrs. Whitney also fell ill but survived.

Following the death of her husband, Minerva Whitney had to find a new home for herself, her elderly father, and her soon-to-be born child. They had to leave the Orphans' Home to make way for the new superintendent and matron. Augustus Storrs offered the former Gilbert house to them and on November 25, 1867, Minerva Whitney purchased the property. Just three months later, she gave birth to a daughter whom she named Edwina after her late husband.

The Connecticut Soldier's Orphans' Home continued to operate into the spring of 1875. By that time most of the Civil War orphans had reached the age limit for state support and the facility then closed. Over its nine years of operation, the orphanage had provided care and education for 153 children. Upon its closure, the building and its farmland reverted to Edwin Whitney's widow, in accordance to the terms of his agreement with the state.

Minerva Whitney was now the owner of a large mothballed orphanage for which she had no use. In May of 1878, she sold the property to Augustus Storrs. The former orphans' home and its associated 50 acres were part of the property that Augustus Storrs later offered to the State of Connecticut to establish the Storrs Agricultural School. His brother, Charles added \$5,000 in seed money. Their gift was accepted on April 21, 1881 and the future University of Connecticut was born.

The former orphans' home became the first building of the new Storrs Agricultural School. It was renamed Whitney Hall after Edwin Whitney. At various times, it housed classrooms and laboratories and served as student and faculty living quarters. It was torn down in 1932. Today its site is marked with a plaque near the intersection of North Eagleville Road and Route 195.

Minerva Whitney and her daughter Edwina lived in the former Gilbert house for just over 50 years. From 1888 through 1900, the Storrs branch of the Eagleville post office was also located in the Whitney's home and Minerva Whitney served as postmistress.

In 1900, Edwina Whitney was appointed librarian of the Connecticut Agricultural College. She held this position for 34 years. During part of this time, she also taught German, English, and American literature. Throughout her adult life, she was much involved in both campus and community activities that she chronicled in her diaries. Those are now in the collection of the Mansfield Historical Society. A dormitory was named in her honor in 1938.

By the early 1900s, the Connecticut Agricultural College had so grown that more land was needed for expansion. The Whitney property then became much desired. After

several years of wooing and negotiation, Minerva Whitney finally agreed to sell her property to the State of Connecticut for use by the college. On March 9, 1918, for the sum of one dollar and other considerations, she conveyed to the state four tracts of land and the buildings thereon. She reserved for herself a small parcel in the area then known as Faculty Row. The state agreed to build a new dwelling on this site for her and her daughter at no cost to them. As part of the agreement, the road there was to be forever named Whitney Road, in honor of Edwin Whitney. Ironically, this house was among the former Faculty Row houses that were demolished in 2017.

After Minerva and Edwina Whitney moved to their new home on Faculty Row, their old house was divided into two apartments and was used for faculty housing. In 1964, it was refurbished to become the International House. It served this purpose for over two decades. Afterwards, in 1999, the Whitney house became the temporary quarters of the Rainbow Center that serves UConn's LGBTQ+ community. The center relocated to the Student Union in 2004.

For the next 19 years, the Whitney house stood empty and received minimal maintenance. It's unfortunate that another use could not be found for the building. A vacant building is always an invitation for disaster. It's not surprising that catastrophe finally struck and the Whitney house caught fire. It's a sad ending to its long and significant history.

Unfortunately, the University has a poor record when it comes to stewardship of the historic buildings within its boundaries. A prime example is the 18th century Farwell house that once stood at the crest of Horsebarn Hill. By the 1970s, it had fallen into a sad state of disrepair and University officials deemed it too costly to repair. On November 27, 1976, the house was burned as part of a fire training exercise. Twelve area fire departments took part in the drill. Within a few hours, the house that had stood for over 220 years was gone and a firestorm of public protest was ignited.

The burning of the Farwell House was met with immediate public outrage and protest. Members of the Mansfield Historical Society were among the many who deplored the destruction of the 18th century Farwell house.

The Society formed a committee and a series of resolutions were prepared and sent to the University administration. They recommended that the University adopt a preservation policy and that an inventory be made of all significant architecture, historic sites and scenery. They also called for the Board of Trustees to appoint a review board to consider all proposed development, renovation, or demolition of the inventoried structures, sites and places.

Not all of these recommendations were adopted, but the University had been put on notice that its historic buildings were valued and that the public wanted them preserved.

In 1989, a University of Connecticut Historic District was established and listed on the National Register of Historic Places, with the Whitney House identified as a contributing building within the district. The University also adopted a Historic Preservation and Adaptive Reuse Plan in 2015 as part of its Master Plan.

However neither of these actions guarantee preservation of the University's historic buildings. In fact, the Master Plan indicates that not all of the contributing historic buildings within the designated historic districts are expected to remain in the future. If you look at the plan, you'll see that several historic buildings on the main campus and Depot campus have been identified for future removal or relocation. Part of the plan was already implemented in 2017 when most of the former Faculty Row houses were demolished. In 2021, several outbuildings at Spring Manor Farm, another UConn property, were also torn down after they had deteriorated beyond repair.

It is my hope that both the town and university communities will continue to advocate for their historic resources. It will take the voices of many to prevent further loss of Mansfield's and the University's heritage as expressed in the built environment.

It can be done, as evidenced by the restoration of the Farwell-Jacobson Barn in 2003. It was saved through the efforts of a citizen's action group, known as the Coalition to Save Horsebarn Hill. In 1999, they mounted a campaign to stop construction of a Pfizer research facility on Horsebarn Hill Road that would have altered the historic agricultural landscape. As part of their strategy, they succeeded in getting the Farwell-Jacobson barn and its surrounding 25 acres listed on the National Register of Historic Places. After the Pfizer project was abandoned, citizens continued to push for restoration of the dilapidated barn.

Plans were made to install temporary tarps over the roof to prevent further damage before restoration. When this had not been done a year later, a community group called Friends of the Farwell Barn took matters into their own hands. With contributions from local citizens, alumni and area merchants, they purchased a tarp and arranged for its installation on July 28, 2001. Restoration of the barn was finally completed by Kronenberger & Sons Restoration, Inc. in 2003.

The barn is now a beloved landmark at the north entrance to campus and is a popular backdrop for UConn graduates and E.O. Smith prom-goers to take photos. It is adjacent to where the 18th century Farwell house once stood before it was burned as a

fire training exercise in 1976. It was this loss that sparked a preservation movement in town and led to the establishment of historic districts both in town and on campus.

The relocation and reconstruction of the Ash house is another success story. In the fall of 1999, the University planned to demolish a 275-year-old house that it owned, known as the Ash House. It was among Mansfield's oldest houses, dating to between 1742 and 1752. The house had been used as a rental property and then stood empty for a number of years, falling into severe disrepair.

A group of historically minded citizens convinced the University to auction the house rather than demolish it. A local couple, Greg and Emine Cichowski, were successful in purchasing it, with the understanding that they would have to move it. They successfully dismantled the house and over the course of several years rebuilt it on a nearby tract of land on Old Turnpike Road. It has been beautifully restored.

There are still other threatened historic buildings on campus and throughout Mansfield. I hope that the community will remain vigilant and continue to speak out for preservation as needed.

17 Southwood Road
Storrs, CT 06268
August 4, 2023

James Libby, Sr. Project Manager
University Planning, Design & Construction
3 Discovery Drive U-6038
University of Connecticut 06269

Scoping Comments – Proposed Demolition of Whitney House, UCONN Campus

Dear Mr. Libby,

Below are my concerns, questions and comments regarding the proposed demolition of the Whitney House on Storrs Road on the UCONN campus Storrs. Would you please include them in the Scoping process for this property.

Would demolition of the Whitney House enable widening of Storrs Road (Route 195) between the intersection of N Eagleville Road and Mansfield Road that otherwise would not be possible? Within the past thirty years discussion has occurred and reoccurred regarding the potential to widen Storrs Road within the above-mentioned section. Does the current presence of the Whitney House in any way impact the potential for widening Storrs Road in this campus section? In this regard, does the existence of the house serve as a barrier to widening Storrs Road? Are there any potential plans or is there any discussion in the long term for widening Storrs Road in this area? If so, this would be an example of segmented planning and therefore this possibility and potential consequence from the demolition of the Whitney House should be part of this Scoping process.

Surely widening Storrs Road in the middle of the UCONN campus and in the area of regional high school E O Smith would have potential traffic and environmental impacts. Traffic volume, pedestrian and vehicular safety (including UCONN and high school buses), as well as air quality would all be affected. I note that not only UCONN students cross Storrs Road in this greater area but also high school students from E O Smith High School who cross the road daily to access their athletic fields. The brook which sits just north of the Whitney House would be potentially affected also by widening Storrs Road. To my knowledge, UCONN still does not participate in regular air quality monitoring and reporting on campus. Changes in traffic patterns and volumes in this area could affect air quality. Student dorms and apartments line Storrs Road with windows open to road traffic exhaust.

Beyond its designation as part of UCONN Historical District does the Whitney House, one of the oldest structures on campus, currently have other town, state, or federal historic designation? How was it decided that the property was “beyond reasonable repair”? Who made this decision? What was the basis of the decision? Were formal bids sought for its repair? Was the building’s historical, aesthetic, architectural, and cultural value comprehensively considered or was this decision made on economics alone? A conscientious evaluation of the historical, aesthetic, cultural, architectural, and town value of the Whitney House should be included in the

analysis and subsequent determination of whether to restore or destroy this building. Cost of rehabilitative/restorative construction needs to be evaluated in this historic, cultural, and aesthetic context. Simple economics based solely on the dollar cost of destruction or restoration alone is not sufficient when considering the future of an irreplaceable historic building.

Alternatives need to be looked at as to why the building needs to be restored and what its value is as a historical and cultural resource. Additionally, potential functional use of the building should also be considered. Centrally located on campus this structure served for many years as a vibrant and active International House. I personally attended many pleasant functions there. Surely it could serve well for some other campus use in the future.

The building itself is attractive, speaks clearly to our New England history and offers a pleasant aesthetic relief among the more institutional structures on campus. UCONN has done a nice job with color choices for the clapboard as well as the attractive blue tint of the shutters. I think the house is a little jewel in the center of the campus and adds a valuable historical reference. I enjoy walking and driving past it and I have, as stated above, spent many a pleasant afternoon and evening attending functions in it in years past.

Part of this Scoping process should be an honest discussion by UCONN as to what its ultimate plans are for this property should the Whitney House be demolished and removed.

The Great Lawn which sits to the north of the Whitney House and abuts Storrs Road is a signature aspect of the UCONN campus and one of its most gracious and valued physical assets. It is my recollection that this sweeping lawn received some sort of protected status from the CT legislature years ago. Has this been researched or taken into consideration during evaluation of the disposition of the Whitney House? Would removal or preservation of the Whitney House potentially affect the preservation or destruction of the Great Lawn? Has there been any discussion of the role of the existence of the Whitney House in protecting the Great Lawn? Are both the Great Lawn and the Whitney House part of a connected or integrated historic district? Does the Whitney House sit just outside of the designated Great Lawn? If the Whitney House were to be destroyed would its property be joined to the protected area of the Great Lawn? I urge you to consider the future and the aesthetic value of the Great Lawn in the context of the proposed Whitney House demolition – reviewing carefully the alternative of preserving the Whitney House for its own value as well as in the context its helping to preserve the future of the Great Lawn as it currently exists. The scenic value of the elegant sweep of lawn on the west side of Storrs Road from N Eagleville to Mirror Lake (including the Whitney House) is considerable and unique to the UCONN campus.

Thank you for the opportunity to comment on this proposal through the Scoping process.

Sincerely,

Alison Hilding

Whitney House Demolition Public Scoping Meeting
Written Comments of Bruce Clouette
483 Woodland Road
Storrs, CT 06268
clouette@charter.net

August 4, 2023

I believe that the University's proposal to demolish the Whitney House, as described in the Scoping Meeting of July 25, 2023, is insufficiently developed, and that a full Environmental Impact Evaluation (EIE) under the Connecticut Environmental Policy Act (CEPA) is called for. In my opinion, the Scoping Meeting was inadequate for the following reasons:

1. Agency Comment. The comments of the Department of Energy and Environmental Protection were summarized at the Scoping Meeting. However, there was no indication that the project had been reviewed by the State Historic Preservation Office (SHPO) or that SHPO had transmitted any comments to the University. Since this is a case of the final loss of a National Register of Historic Places-listed property, the public ought to have been informed of the position of this key review agency.
2. Technical information. The presentation made claims about the structural damage and excessive costs associated with restoration or repairs to the building, but no actual evidence was offered to back up these claims. Have technical studies been done to assess the damage and draw up cost estimates for the various alternatives, or are these claims just "seat of the pants" speculation? If technical studies have been done, they should have been made available to the public prior to the Scoping Meeting. If they have not been done, then they should be undertaken as part of an EIE.
3. Alternative analysis. In order to be meaningful, any alternative analysis should include an appropriate range of possibilities, yet the most obvious (to me) alternative was not even mentioned: selective demolition of the most seriously damaged portion, the later rear ell, and repair and adaptive re-use of the more historic and publicly visible portion of the building. At a minimum, the Scoping Meeting should have addressed the viability of this alternative. Leaving out a plausible alternative alone is grounds for undertaking an EIE.

I hope you will indulge me if I mention my personal relationship with UConn and the Whitney House. I came to UConn in 1971 for graduate study, earned my degree, occasionally taught as an adjunct, and have been a proud alumnus for 50 years. I remember the Whitney House as an elegant, well-preserved, active facility; on one occasion, I and other graduate students met the internationally renowned poet Stephen Spender there when he came to campus for a reading.

I would like to compliment the University and the consultant, Fuss & O'Neill, for the clarity and objectivity of the Scoping Meeting, especially for making it clear that the building is significant as a contributing building within a listed historic district and that the neglect of the building began almost twenty years ago, when it was taken out of use (rather than being unpredictable "accidents," fires like the one that occurred in January are all too common in underutilized or abandoned buildings).

Throughout the presentation, there was the sense that the adaptive re-use of an historic building is somehow antithetical to the mission of an institution of higher learning. A cursory look at nearby colleges and universities, however, suggests the opposite. Smith House, an 1890s Victorian dwelling, is used by Trinity College for visiting faculty and for arts programs. Connecticut College in New London initially planned to demolish the Winslow Ames House, a notable 1930s Mid-Century Modern prefab, but instead abated its asbestos exterior, restored the original windows, and re-purposed it as offices for the Center for Art and Technology. Closer to home, Eastern Connecticut State University occupies several restored Victorian houses within the Prospect Hill Historic District. The list goes on, but suffice to say, UConn is an outlier when it comes to making good use of historic buildings. But why should UConn be in last place?

In the short term, I look forward to the University's responses to these and other Post-Scoping comments as required by CEPA regulations (Sec. 22a-1a-7). My longer term hope, however, is that the preparation of an EIE will point a path to the adaptive re-use of at least the front part of the Whitney House.

From: Michael Emmons <mjej@udel.edu>

Sent: Friday, August 4, 2023 8:08 AM

To: Libby, James <james.libby@uconn.edu>

Subject: Historic Whitney House

Dear Mr. Libby,

I am a UConn alum who is now an architectural historian and professor of historic preservation. I write to ask that the administration reconsider the demolition of the historic Whitney house on the UConn campus.

Simply put, the Whitney house is a rare survival in Storrs, a 200+ year old building that embodies the history of Mansfield and of the university. Driving down Rt 195, it's one of the few historic structures that remains to tell the deeper history of the area UConn now dominates.

I know the literature suggests this structure is damaged "beyond repair," but I've often seen that claim for historic structures that retain a substantial amount of a material integrity and an ability to be rehabilitated. I hope the university is considering all options, even creative ones, to ensure that UConn is a responsible steward of our history and culture in Connecticut.

Thanks for your time,

Michael Emmons
UConn History MA, 2004

From: David Schump <dschump725@gmail.com>

Sent: Friday, August 4, 2023 7:04 AM

To: Libby, James <james.libby@uconn.edu>

Subject: SAVE the Whitney House!!!

Please save the Whitney house and do the Rehabilitation/salvage. needed to keep this treasure.

David A. Schump a.k.a. The Art Tramp

www.thearttramp.com

www.facebook.com/ArtTramp

www.etsy.com/shop/TheArtTramp

From: steve marshall <historichouseguy@gmail.com>

Sent: Thursday, August 3, 2023 9:34 PM

To: Libby, James <james.libby@uconn.edu>

Cc: steve marshall <historichouseguy@gmail.com>; Michael Forino <mforino@preservationct.org>

Subject: Whitney House aka Gilbert House

Mr. James Libby AIA,

I'm writing as a concerned Preservationist local to the area about the demolition of yet another Historic Structure on Campus.

Is there a published report, Condition Assessment and possibly a fire Marshall's report available for review on the current structures post fire conditions?

What I see from the provided photos is total loss of the roof structure in the Ell and only smoke damage in the photo of the front room. On a "drive by" the structure (Main House) looks quite remarkably square and true given its age. There certainly is much left to salvage here speaking from 48 years of experience. The Town of Coventry, right next door had a similar era building known as Caprilands Herb Farm on Silver Street that was in deplorable condition from over 20 years of vacancy much like this building .

Caprilands has been disassembled and moved off site to be reassembled elsewhere.

Without setting foot inside I would say the Whitney house (front main structure) is a likely Candidate for the same situation if careful consideration for on site rehabilitation has been exhausted.

There's but a few examples of Mansfield's early built heritage left as one drives through Campus. It will be a significant loss to the character of Mansfield. I urge the committee to step back, stop the clock, and look at the cultural resources left and count this as one worthy of Rehabilitation.

I would like to request a extension for public comment to be extended for 30 days considering we are in the middle of prime vacation time. This is exactly why I am putting forth a eleventh hour request for such, I just flew in from the opposite end of the country last night.

Respectfully Submitted,

Stephen C Marshall

1346 South Street

Coventry CT

From: Brian Bartizek <bnbartizek@gmail.com>

Sent: Friday, August 4, 2023 11:10 AM

To: Libby, James <james.libby@uconn.edu>

Subject: Fwd: Whitney house

Begin forwarded message:

From: Brian Bartizek <bnbartizek@gmail.com>

Subject: Whitney house

Date: August 4, 2023 at 11:07:09 AM EDT

To: jameslibby@uconn.edu

Dear sir,

As a Uconn alumni and eastern CT resident, I strongly urge you to delay demo. and allow a licensed and insured contractor skilled in antique materials remove all the period features.

I would prefer that Uconn repair it in place , but I guess after spending all that money on football and a hockey rink, that is too much to ask.

Brian Bartizek



To: James Libby, University Planning, Design, and Construction, University of Connecticut

From: Linda Brunza, Environmental Analyst

Telephone: 860-424-3739

Email: Linda.Brunza@ct.gov

Date: 8/3/2023

Subject: Scoping Notice for the Demolition of Whitney House

Staff at the Department of Energy and Environmental Protection (DEEP) have reviewed the scoping notice for the Whitney House, one of the oldest structures on campus built in the early 1800's. The house has been deemed unsafe for occupancy and beyond reasonable repair due to fire and smoke damage earlier this year. The proposed project is to demolish the building to eliminate liability and hazards associated with the existing structure.

The following comments are submitted for your consideration.

Natural Diversity Database (NDDDB)

Contact: Robin.Blum@ct.gov

The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. This site is located in a Natural Diversity Database Area and a Request for NDDDB State-listed Species Review can be completed online using DEEP's ezFile Portal, which can be found on DEEP's website for [NDDDB Environmental Reviews](#).

Remediation Division

Contact: Tiziana.Shea@ct.gov

The Remediation Division has no immediate concerns with this proposed project, which aims to decrease hazards and liabilities with the current state of the structure. The Remediation Division's case management database shows that UConn is or has been enrolled in a number of remediation programs. Therefore, caution should be given to site surroundings to ensure the work done does not impede or compromise any other remedial work, engineered controls, environmental use restrictions, etc. at the site. All debris, waste and any necessary characterization should be handled in accordance with all applicable state and local codes.

Water Planning and Management Division

Contact: Marlene.Krajewski@ct.gov

This facility is next to Mirror Lake and Roberts Brook (the latter which has a water quality assessment of Not Supporting Aquatic Life). The University has been planning a Mirror Lake impoundment and dam reconstruction project which may improve water quality to the impoundment and the Brook. The proposed demolition should consider appropriate coordination with sediment and erosion control and stormwater quality management measures to protect the water resources of the current impoundment and the Brook. A carefully demolished and stabilized site may provide additional watershed/littoral resource protection and associated habitat enhancement into a modified dam reconstruction and lake restoration project.

Demolitions and Renovations on Property Subject to Permitting Under Title V of the Clean Air Act
Contact: Jacob.Felton@ct.gov

DEEP administers the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos (at 40 CFR 61.140, *et seq.*) on property subject to permitting under Title V of the Clean Air Act. Prior to undertaking a regulated demolition or renovation operation, the owner or operator is required to thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos. The owner or operator is required to notify DEEP, as well as the U.S. Environmental Protection Agency (EPA), at least 10 working days before asbestos stripping or removal work or any other regulated activity begins. Notification is required at least 10 working days before a regulated demolition operation begins *irrespective of the presence of asbestos*. Additional work practice requirements may apply depending on the amount and type of asbestos present.

The notification form can be found here: https://portal.ct.gov/-/media/DEEP/air/compliance_monitoring/forms/AsbestosDemolitionandRenovationNotificationForm.pdf

The form may be submitted via e-mail to deep.cacu@ct.gov or by mail to:

DEEP Air Compliance Analysis and Coordination Unit, 5th Floor
Department of Energy and Environmental Protection
79 Elm St.
Hartford, CT 06106-5127

The form must also be submitted to EPA Region 1 Headquarters at:

EPA New England Headquarters
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Note that the asbestos NESHAP also applies on properties not subject to permitting under Title V of the Clean Air Act; however, on such properties, the requirements of this regulation are administered exclusively by EPA.

Solid Waste Disposal

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g. contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at [Demolition Debris](#).

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. Pursuant to section 22a-241a of the CGS, the state set a goal of 60% rate of diversion from disposal for municipal solid waste by the year 2024 and adopted that goal in the state's December 2016 *Comprehensive Materials*

Management Strategy. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. Additional information concerning construction and demolition material management and waste management plans can be found on-line at [Construction and Demolition Material Management](#) and [Construction and Demolition Waste Management Plans](#).

Special Waste

If abatement is required for asbestos containing materials (ACM), these materials are regulated as a “special waste” in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these materials may only be disposed of at facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities. For further information, contact the Waste Engineering & Enforcement Division at 860-424-3023. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: [Special Waste Fact Sheet](#).

Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (i.e., paint, roofing, flooring, insulation, etc.). EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. The guidance can be found at: [PCBs in Caulk](#). Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors, roofs, ventilation, etc.) and demolition projects, whenever possible. However, the continued use of such PCB materials is prohibited and, where it is identified, it must be addressed. EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP. Further information concerning the DEEP PCB Program can be found on-line at: [DEEP PCB Program](#). Please contact Gary Trombley at 860-424-3486 with any questions.

In addition to asbestos and PCBs, demolition debris may also be contaminated with lead-based paint, chemical residues, or other materials that require special disposal. For more information on these materials and disposal, see the [DEEP's Renovation and Demolition Web Page](#).

Deconstruction, an environmentally friendly alternative to demolition, should be utilized in order to salvage as many of the reusable materials as possible, diverting them from the waste stream. Salvaged items typically include doors, windows, cabinets, lighting and plumbing fixtures, framing lumber, roofing materials, and flooring. Additional information concerning deconstruction can be found on-line at: [Deconstruction](#).

Stormwater General Permit

The General Permit for [Stormwater and Dewatering Wastewaters from Construction Activities](#) may be applicable 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. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices.

The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable projects (projects primarily by private developers).

Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form and SWPCP to the Department 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. The construction stormwater general permit registrations must be filed electronically through DEEP's e-Filing system known as ezFile. Additional information can be found on-line at: [Construction Stormwater GP](#).

Air Management

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.

Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

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 and may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Eric Hammerling

Antonia Moran
Mayor

July 31, 2023

Mr. James Libby
Sr. Project Manager
University Planning, Design and Construction
31 LeDoyt Road, U-6038
Storrs, Connecticut 06269-3028

Via Email: james.libby@uconn.edu

Subject: Whitney House Demolition CEPA Scoping Comments

Dear Mr. Libby:

The Mansfield Town Council and Planning and Zoning Commission offer the following comments and recommendations with regard to the Demolition of Whitney House at the University of Connecticut CEPA Scoping Process. Additional information on the comments expressed in this letter can be found in the memo from Jennifer Kaufman to the Planning and Zoning Commission on July 13, 2023 (enclosed).

While the Town of Mansfield has no jurisdiction over the University of Connecticut Historic District, it should be noted that Goal 4.1 of the Mansfield Tomorrow Plan of Conservation and Development states "Mansfield honors and preserves its historic resources by protecting them for future generations." Further, the 2015 UConn Campus Master Plan, states that long-term stewardship of campus heritage is an important goal and one worthy of full consideration and implementation by the University.

Demolition of Whitney House will remove a prominent historic structure from State Route 195 which runs through UConn and serves as a gateway to Downtown Storrs traveled by both Mansfield residents and visitors throughout the region.

As the Whitney House is a contributing resource to the University Historic District designated in 1989 and is listed on the National Register of Historic Places, as well as on the State of CT Register, the University is urged to prioritize the care and preservation of historic properties.

If the structure is to be demolished, the University is strongly encouraged to follow appropriate decommissioning and salvaging procedures as defined by the State Historic Preservation Office (SHPO) so that historic resources are preserved. In addition, all measures to prevent erosion and sedimentation of Mirror Lake should be implemented. Finally, if the structure is to be demolished, all measures to prevent erosion and sedimentation of Mirror Lake should be implemented.

Moving forward, the Town urges the university to prioritize the care and maintenance of contributing historic buildings in the planning and budgeting process as detailed in the guidelines established in section 4.2.2 of [UConn's Historic District: Evaluation and Process](#)

(October 2016 and revised to January 2017) as they impact important historical resources for the Town of Mansfield.

We appreciate the opportunity to provide feedback regarding the proposed Demolition of Whitney House. If you have any questions regarding these comments, please contact Jennifer Kaufman, Director of Planning and Development at KaufmanJS@MansfieldCT.org.

Sincerely,



Antonia Moran
Mayor

Sincerely,



Paul Aho
Chair, Planning and Zoning Commission

Enc. July 13, 2013 Memo from J. Kaufman to PZC

cc: Town Council
Planning and Zoning Commission
Historic District Commission

MEMO

To: Planning and Zoning Commission
From: Jennifer Kaufman, AICP, Director
Date: July 13, 2023
Subject: Whitney House Demolition CEPA Scoping

On July 3, 2023, a Notice of Scoping was published in the [Connecticut Environmental Monitor](#) indicating that UConn is proposing to demolish Whitney House also known as Gilbert House and more contemporaneously known as the Rainbow Center or International House. As stated in the information provided by UConn, this structure was built between 1802 and 1807 and is located on Storrs Road (SR-195). UConn reports that Whitney House is one of the oldest structures on campus and this colonial revival house has been a contributing resource to the University of Connecticut Historic District since 1988 as recognized by the National Register of Historic Places.

Current Name: Whitney House
Historic Name: International House / John Gilbert Jr. House
Date of Construction: 1802-07
Architect(s):
Style: Colonial
Type of Structure:
Current Use(s): Administration
Original Use(s): Residence
Gross Square Footage: 5,027 SF
Historic Status: UConn Historic District: Contributing (C)
Notable Landscapes: Mirror Lake
Roberts Brook

Notes:



The structure has been vacant since 2004. In January 2023, a fire caused irreparable fire, smoke, and water damage making it unsafe for occupancy and beyond reasonable repair. In May 2023, UConn submitted a Project Review Cover Form (attached) to the State Historic

Preservation Office (SHPO). SHPO will be reviewing the project to ensure compliance with the Connecticut Environmental Policy Act.

Additional project information is available at <http://updc.uconn.edu/whitney-house>. The Project Review Cover Form, which includes the project background, scope of work, and a site location map is provided for your information. There will be an online public scoping meeting on Tuesday, July 25, 2023, at 6 pm for this proposed action and a video of the meeting will be available after the meeting at this same website.

SCOPING PROCESS

The scoping process provides the Town with the opportunity to identify specific issues that we would like UConn to consider as they determine whether an Environmental Impact Evaluation (EIE) is required pursuant to Title 22a, Environmental Protection, C.G.S. UConn is required to make this determination within six (6) months of the close of the scoping comment period.

Threshold Criteria for Preparation of an EIE

Pursuant to Section 22a-1a-8 of the CEPA regulations, an environmental impact evaluation is “required for those actions listed in an environmental classification document as requiring such an evaluation or for those actions for which the full degree of actual impact remains undetermined after the conclusion of public scoping but which may significantly affect the environment.”

To determine whether a proposed project may significantly affect the environment, Section 22a-1a-3 of the CEPA Regulations requires that UConn:

- Consider the direct, indirect, and cumulative effects of an action as those effects are described in subsection (b) and (c) of this section, and
- Assess the setting, duration, irreversibility, controllability, geographic scope, and magnitude of those effects as the potential or actual consequences of an action.

Direct, indirect and cumulative effects are described in Section 22a-1a-3 of the Regulations:

“(b) **Direct and indirect effects.** Direct effects are the primary environmental consequences which would result from the implementation of an action. Indirect effects are the secondary consequences on local or regional social, economic or natural conditions or resources which could result from additional activities (associated investments and changed patterns of social and economic activities) induced or stimulated by the action, both in the short-term and in the long-term. As required by subsection (a) of this section, an agency shall consider direct and indirect effects of an action, including but not limited to, the following:

- (1) Effect on water quality, including surface water and groundwater;
- (2) Effect on a public water supply system;
- (3) Effect on flooding, in-stream flows, erosion or sedimentation;
- (4) *Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings;*
- (5) 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;

- (6) Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;
- (7) Substantial aesthetic or visual effects;
- (8) Inconsistency with:
 - (A) the policies of the state plan of conservation and development developed in accordance with section 16a-30 of the Connecticut General Statutes;
 - (B) other relevant state agency plans; and
 - (C) applicable regional or municipal land use plans.
- (9) Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impact on existing housing where sections 22a-1b(c) and 8-37t of the Connecticut General Statutes require additional analysis;
- (10) Displacement or addition of substantial numbers of people;
- (11) Substantial increase in congestion (traffic, recreational, other);
- (12) A substantial increase in the type or rate of energy use as a direct or indirect result of the action;
- (13) The creation of a hazard to human health or safety;
- (14) Effect on air quality;
- (15) Effect on ambient noise levels;
- (16) Effect on existing land resources and landscapes, including coastal and inland wetlands;
- (17) Effect on agricultural resources;
- (18) Adequacy of existing or proposed utilities and infrastructure;
- (19) Effect on greenhouse gas emissions as a direct or indirect result of the action;
- (20) Effect of a changing climate on the action, including any resiliency measures incorporated into the action; and
- (21) Any other substantial effect on natural, cultural, recreational, or scenic resources.

(c) **Cumulative effects.** Cumulative effects are the effects on the environment which result from the incremental impact of the action when considered with past, present or reasonably foreseeable future actions to be undertaken by the sponsoring or participating agencies. In reviewing an action for its cumulative effects as required by subsection (a) of this section, an agency shall consider that cumulative effects include the incremental effects of similar actions with similar environmental effects and the incremental effects of a sequence of actions undertaken pursuant to an ongoing agency program which may have a significant environmental effect even though the individual component actions would not.”

Town Review

Per tradition, comments are typically submitted jointly by the PZC and Town Council. The deadline for comments is August 4, 2023.

POTENTIAL IMPACTS

The following comments and concerns have been identified by staff. The Historic District Commission will be convening a special meeting next week to review this item.

It is noted that the following comments are based on the information available to-date and that lack of comments on specific elements identified in the CEPA Regulations should not be construed to mean that there will be no impacts to that element.

- *Aesthetic Resources (Sec. 22a-1a-3-b-7 and Sec. 22a-1a-3-b-8c).* Demolition of Whitney House will remove a prominent historic structure from SR 195 which runs through UConn and serves as a gateway to Downtown Storrs traveled by both Mansfield residents and visitors throughout the region.
- *Historic, Archeological, Cultural, and Recreational Resources (Sec. 22a-1a-3-b-4).* The establishment of the Historic District by the University in 1988 placed the contributing resources (of which the Whitney House is one) on the National Register of Historic Places, as well as on the State of CT Register. The former is regulated by the National Park Service and the latter by SHPO (the State Historic Preservation Office). Such designations obligate the University to the care and preservation of included properties. The University's Skidmore, Owings and Merrill (SOM) 2015 Campus Master Plan outlines the importance of this heritage district and includes specific recommendations for proper maintenance and care of these properties.
- *Wetlands and Surface Water Resources.* If the structure is to be demolished, all measures to prevent erosion and sedimentation of Mirror Lake should be implemented.
- *Consistency with State and Local Plans.* While the Town of Mansfield has no jurisdiction over the University of Connecticut Historic District, it should be noted that Goal 4.1 of the Mansfield Tomorrow Plan of Conservation and Development states "Mansfield honors and preserves its historic resources by protecting them for future generations."

[UConn's Historic District: Evaluation and Process](#) developed in October 2016 and revised to January 2017 as part of the UConn Campus Master Plan, states that long-term stewardship of this campus heritage is an important goal and one worthy of full consideration and implementation by the University. Care and maintenance guidelines are detailed in section 4.2.2 of this University document. The guidelines state:

Proper maintenance is fundamental to the long-term stewardship of the University of Connecticut Historic District. For historic buildings, maintenance must be prioritized in the planning and budgeting process. When maintenance work is performed, it must be sensitive to the historic character of each building or landscape in question.

- Ensure that an active program of conservation for historic buildings and landscapes is an integral part of regular operations and maintenance.
- When significant maintenance work or other capital projects (renovation expansion) are conducted on historic buildings, photographic and written documentation should be collected at each phase of work conducted.

- Historic features should be repaired rather than replaced unless no other alternative exists.
- For buildings that are temporarily or permanently unoccupied, institute measures to ensure long-term preservation through mothballing and other protections.

SUMMARY/CONCLUSION

Per past practice, the Planning and Zoning Commission and Town Council typically co-endorse a letter containing the Town's official comments on proposed UConn projects.

DRAFT Comments

Per past practice, the Town Council and Planning and Zoning Commission typically co-endorse a letter containing the Town's official comments on proposed UConn projects. The Planning and Zoning Commission reviewed the project at their July 17, 2023 meeting and authorized the Chair to submit comments in accordance with the following:

- While the Town of Mansfield has no jurisdiction over the University of Connecticut Historic District, it should be noted that Goal 4.1 of the Mansfield Tomorrow Plan of Conservation and Development states "Mansfield honors and preserves its historic resources by protecting them for future generations." Further, the 2015 UConn Campus Master Plan, states that long-term stewardship of campus heritage is an important goal and one worthy of full consideration and implementation by the University.
- Demolition of Whitney House will remove a prominent historic structure from State Route 195 which runs through UConn and serves as a gateway to Downtown Storrs traveled by both Mansfield residents and visitors throughout the region.
- As the Whitney House is a contributing resource to the University Historic District designated in 1988 and is indicated on the National Register of Historic Places, as well as on the State of CT Register, the University is urged to prioritize the care and preservation of historic properties.
- If the structure is to be demolished, the University is strongly encouraged to follow appropriate decommissioning and salvaging procedures as defined by the State Historic Preservation Office (SHPO) so that historic resources are preserved. In addition, all measures to prevent erosion and sedimentation of Mirror Lake should be implemented.
- Moving forward, the Town urges the university to prioritize the care and maintenance of contributing historic buildings in the planning and budgeting process as detailed in the guidelines established in section 4.2.2 of [UConn's Historic District: Evaluation and Process](#) (October 2016 and revised to January 2017) as they impact important historical resources for the Town of Mansfield.

SUGGESTED MOTION

MOVE to authorize the Chair to prepare and submit comments to the University of Connecticut on behalf of the Planning and Zoning Commission regarding the demolition of Whitney House in conjunction with the Town Council. Said comments shall be based on the report dated July 13, 2023, from Jennifer Kaufman and comments from the Historic District Commission, if available, [with the following changes:]

August 7, 2023

Mr. James Libby
University Planning, Design & Construction
3 Discovery Drive, U-6038
Storrs, CT 06269
(sent only via email to james.libby@uconn.edu)

Subject: Whitney House Demolition
1315 Storrs Road
Mansfield (Storrs), CT

Dear Mr. Libby:

The State Historic Preservation Office (SHPO) has reviewed the referenced project in response to a Public Notice in the Environmental Monitor dated July 18, 2023. SHPO understands that the Whitney House was damaged by fire and water earlier this year and that the University of Connecticut (UConn) Building Official, pursuant to State Building Code §116, concluded that the building is unsafe. As a result, SHPO does not object to its proposed demolition, but we do regret the continued loss of significant historic features associated with the UConn Historic District - Connecticut Agricultural School, a property listed on the National Register of Historic Places. As one of the oldest buildings at UConn, constructed during the early 19th century, the Whitney House was a significant remnant of the original historic campus.

While the demolition of the Whitney House can proceed without causing substantial ground disturbance, an archaeological reconnaissance should be completed, if plans to redevelop the house lot are developed in the future.

Although this office recognizes that UConn did not deliberately cause the fire, the loss of the Whitney House does constitute a substantial loss to the UConn Historic District – Connecticut Agricultural School. Many universities and colleges across the US use the historic nature of their campuses to help entice new students, who enjoy the character of the historic buildings and landscapes. To prevent the further loss of historic buildings on the campus, SHPO would be happy to work collaboratively with UConn to compensate for this loss, SHPO recommends that UConn devote resources and/or take actions to preserve the iconic dairy barn, another significant historic asset along Storrs Road that conveys the University's agricultural heritage and is in need of preservation work. Because SHPO is not fully aware of any actions taken to date on the dairy barn, our office would appreciate additional consultation to determine what actions are appropriate and should be undertaken. These may include, but are not limited to, a structural analysis or conditions assessment; stabilization efforts; a rehabilitation plan; and/or a plan for reuse.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's important historic resources. For additional information, please contact Catherine Labadia, Environmental Reviewer, at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,





Jonathan Kinney
State Historic Preservation Officer