



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

Instructions for Use:

The Environmental Review Checklist (ERC), as defined in Sec. 22a-1a-1(9) of the Regulations of Connecticut State Agencies (RCSA), is intended to assist state agencies in (1) determining whether a proposed action or category of actions requires public scoping, or (2) in recording an agency's initial assessment of the direct, indirect, and cumulative environmental effects of a proposed action at the completion of public scoping.

For the purposes of CEPA, an Action is defined in Sec 22a-1a-1(2) of the RCSA as an individual activity or a sequence of planned activities initiated or proposed to be undertaken by an agency or agencies, or funded in whole or in part by the state.

Completion of the ERC is only *required* as part of a sponsoring agency's post-scoping notice in which the agency has determined that it will not be preparing an EIE (Sec. 22a-1a-7(d) of the RCSA).

In all other instances, the sponsoring agency has the option to use this form or portions of it, in conjunction with the applicable Environmental Classification Document (ECD), as a tool to assist it in determining whether or not scoping is required and to document the agency's review. This can be especially useful for an agency administering a proposed action that is not specifically represented in the ECD or which may have additional factors and/or indirect or cumulative impacts requiring further consideration.

Even if an agency ultimately determines that public scoping is not necessary, as a matter of public record OPM highly recommends that the agency internally document its decision, and its justification.

In completing this form, include descriptions that are clear, concise, and understandable to the general public.

Note that prior to reviewing a proposed action under the Connecticut Environmental Policy Act (CEPA), Connecticut General Statutes (CGS), Section 16a-31 requires agencies to review any proposed actions for the acquisition, development or improvement of real properties, or the acquisition of public transportation equipment or facilities, and in excess of \$200,000, for consistency with the policies of the State Plan of Conservation and Development (State C&D Plan).



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Last Updated 02/25/2020

PART I – Initial Review and Determination

Date: May 7, 2024
Name of Project/Action: University of Connecticut New School of Nursing Building
Project Address(es): Bolton Road
Affected Municipalities: Mansfield

Sponsoring Agency(ies): University of Connecticut
Agency Project Number, if applicable: 300260
Project Funding Source(s)/Program(s), if known: University funds

Identify the Environmental Classification Document (ECD) being used in this review:

Generic, or Agency-Specific

An environmental assessment or environmental impact statement is being prepared pursuant to NEPA, and shall be circulated in accordance with CEPA requirements.

The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment, or indicate the status of those reviews: The CT SHPO was notified of the proposed project during the public scoping phase. UConn also submitted a Project Review Cover Form to the Connecticut State Historic Preservation Office (SHPO) on February 15, 2024. A response was received on April 15, 2024 which stated that, due to prior ground disturbance, it is unlikely that significant archaeological resources would be impacted by the proposed activities. Moreover, CT SHPO found that the new School of Nursing Building would be unlikely to be visible from the University of Connecticut Historic District – Connecticut Agricultural School and that the proposed building would not impact the district’s character-defining features. However, the School of Nursing Building is currently located within Storrs Hall, the earliest masonry building within the University of Connecticut Historic District. The CT SHPO indicated that they are available for technical guidance and advice on the re-use of Storrs Hall to ensure that the University retains this significant structure and the unique character of the campus for future generations of students. With this comment taken into consideration, the CT SHPO concluded the project would have no adverse effect on historic properties. The letter is attached.

Based on the analysis documented in this Environmental Review Checklist (ERC), and in consideration of public comments, this agency has determined that the preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Publication of this document to the Environmental Monitor shall satisfy the agency’s responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).

Completed by: Name and Title.

Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.

PART II – Detailed Project Information

Description of the Purpose & Need of the Proposed Action:

The purpose of this project is to accommodate increased enrollment for the School of Nursing that would, in turn, help address the shortage of nurses, the changing nature of healthcare, and the increasing disparity in health outcomes regionally and nationally. Storrs Hall cannot fulfill that purpose or adequately satisfy future requirements in terms of size and spatial configuration. The new School of Nursing Building would support new teaching modes by educating nurses through patient-centered practice, interdisciplinary research, and technology-based innovations.

Description of the Proposed Action:

The University of Connecticut (UConn) plans to construct a new School of Nursing Building on Bolton Road within its South Campus. Currently, the School of Nursing entirely resides in Storrs Hall on the north side of campus. The new School of Nursing Building would be strategically located adjacent to existing clinical, academic, and research space, and in proximity to the long-term development plan outlined in the 2015-2035 Campus Master Plan. The School of Nursing would vacate Storrs Hall and the University would identify a new use for the structure.

The proposed undertaking would construct up to a four-story building, approximately 70,000-80,000 gross square feet (gsf) in size. The building program would include:

- Instructional spaces, including a lecture hall and classrooms
- A Simulation Lab Suite
- A Human Behavioral Research Lab
- A Wet Lab
- A Student Academic Center
- Offices and support spaces

Accessible parking and service and loading zones would also be provided on-site, as well as usable open space around the building. A site plan is available at <https://updc.uconn.edu/nursing>.

The majority of the project site lies within a paved parking facility (Lot S). Employee parking spaces lost in Lot S would be redistributed across other existing parking facilities that have capacity. A small

triangular grass parcel to the south of the parking facility would be relandscaped as part of the project. The project site is located within a developed context; parking facilities, multi-story academic buildings, residence halls, and the South Campus Chiller Plant surround the site. E.O. Smith High School is located to the south, across Bolton Road.

Alternatives Considered:

The University considered several alternatives for addressing the stated purpose and need. These include a No Action alternative, as well as alternatives at two other locations.

Under the No Action Alternative, the new School of Nursing Building would not be constructed, and the functions would be maintained within Storrs Hall on the North Campus. The University would be unable to accommodate the anticipated increase in enrollment at the School of Nursing or the new teaching modes designed to address the changing nature of healthcare. As such, the No Action Alternative would fail to meet the project purpose and need.

During preliminary planning for the project, an alternate site was considered on Hillside Road. However, a fit study determined the site to be unsuitable for a new School of Nursing building.

In addition, the University considered locating the building on an adjacent parcel on Alethia Drive that currently provides patient parking for the Brain Imaging Research Center and Child Development Laboratories within a landscaped setting. The proposed building site was shifted to the southern end of Lot S to eliminate the loss of public parking and to maintain the existing greenspace.

Public concerns or controversy associated with the proposed action:

No public controversy was associated with the proposed action. During scoping, concerns were expressed about the loss of public and University parking, the elimination of a drainage feature at the center of the circular drive, and the loss of greenspace. By shifting the building to the southern end of Lot S, the greenspace would be maintained and the drainage feature would not be eliminated.

PART III – Site Characteristics (Check all that apply)

- The proposed action is non-site specific, or encompasses multiple sites;
- Current site ownership: N/A, State; Municipal, Private, Other: Please Explain.
- Anticipated ownership upon project completion: N/A, State; Municipal, Private, Other: Please Explain.

Locational Guide Map Criteria:

<http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cff556a>

Priority Funding Area factors:

- Designated as a Priority Funding Area, including Balanced, or Village PFA;
- Urban Area or Urban Cluster, as designated by the most recent US Census Data;
- Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
- Existing or planned sewer service from an adopted Wastewater Facility Plan;
- Existing or planned water service from an adopted Public Drinking Water Supply Plan;
- Existing local bus service provided 7 days a week.

Conservation Area factors:

- Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
- Existing or potential drinking water supply watershed(s);
- Aquifer Protection Area(s);
- Wetland Soils greater than 25 acres;
- Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
- Category 1, 2, or 3 Hurricane Inundation Zone(s);
- 100 year Flood Zone(s);
- Critical Habitat;
- Locally Important Conservation Area(s),
- Protected Land (list type): Enter text.
- Local, State, or National Historic District(s).

PART IV - Assessment of Environmental Significance – Direct, Indirect, And Cumulative Effects

Required Factors for Consideration (Section 22a-1a-3 of the RCSA)	Agency’s Assessment and Explanation
Effect on water quality, including surface water and groundwater;	The Proposed Action would not result in any direct impacts to wetlands and watercourses, as field investigation indicated none are located in the project area. Stormwater management for the site has been considered in the context of the Campus Drainage Master Plan and the <i>2023 CT Stormwater Quality Manual</i> , and will include best management practices to avoid direct, indirect, and cumulative impacts to water quality.
Effect on a public water supply system;	The Utility Framework for the Campus completed in 2017, and updated in 2020, evaluated comparable development within the South Campus District. No direct, indirect, or cumulative adverse impacts on campus water supply capacity are anticipated. Additionally, no direct or indirect impacts to the quality or quantity of any other public water supply is anticipated.
Effect on flooding, in-stream flows, erosion or sedimentation;	The project is not located within Connecticut’s coastal boundary or within the mapped 100-year or 500-year Federal Emergency Management Agency (FEMA) floodplain. Stormwater management for the new building would be designed consistent with the campus-wide Drainage Master Plan, so that downstream flooding in Mirror Lake/Roberts Brook would not occur. The Mirror Lake Improvements project (planned to begin in Spring 2025) has been designed to accommodate stormwater from a development of comparable size (accounting for two acres of impervious cover beyond the current residence hall and infrastructure projects). No negative flooding impacts or impacts to in-stream flows would occur. In addition, no direct, indirect, or cumulative impacts are anticipated related to erosion or sedimentation from the construction or operation of the new School of Nursing Building. All work during construction would be conducted consistent with the <i>2023 Connecticut Guidelines for Soil Erosion and Sediment Control</i> . Near the end of design, UConn will submit a flood management verification report to CT DEEP.
Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site;	UConn submitted a Project Review Cover Form to the CT SHPO on February 15, 2024. A response was received on April 15, 2024 which stated that, due to prior ground disturbance, it is unlikely that significant archaeological resources would be impacted by the proposed activities. Moreover, CT SHPO found that the new School of Nursing Building would be unlikely to be visible from the University of Connecticut Historic District – Connecticut Agricultural School and that the proposed building would not impact the district’s character-defining features. However, the School of Nursing Building is currently located within Storrs Hall,

	<p>the earliest masonry building within the University of Connecticut Historic District. The CT SHPO indicated that they are available for technical guidance and advice on the re-use of Storrs Hall to ensure that the University retains this significant structure and the unique character of the campus for future generations of students. With this comment taken into consideration, the CT SHPO concluded the project would have no adverse effect on historic properties. The letter is attached.</p>
<p>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;</p>	<p>There are no waterbodies within or adjacent to the project site and therefore there is no potential for impacts to aquatic species or habitat. UConn coordinated with the CT Department of Energy and Environmental Protection (CT DEEP) Natural Diversity Database (NDDDB) regarding the potential presence of state-listed species within and adjacent to the project site. Correspondence from CT DEEP NDDDB dated 2/21/24 indicated that no negative impacts to state-listed species are anticipated (see attached). Since CT DEEP concluded there would be no negative impacts to state-listed species, and since the project site is currently a paved parking facility, no direct, indirect or cumulative impacts to natural communities, critical species or their habitat, or movement of any species is anticipated.</p>
<p>Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;</p>	<p>The operation of the new School of Nursing Building would not require the use of any new pesticides, toxic chemicals or hazardous materials in such quantities as would cause adverse effects to the environment. Protocols established by UConn’s Division of University Safety, Environmental Health and Safety would ensure that no unreasonable adverse effects would result from the Proposed Action. Best Management Practices during construction would avoid any potential adverse effects to the environment resulting from the operation of construction vehicles and equipment.</p>
<p>Substantial aesthetic or visual effects;</p>	<p>The project site is currently a paved parking facility. The new School of Nursing Building would be consistent in height with adjacent buildings, including the South Campus Residence Hall and the Louisa J. Rosebrooks Residence Hall, and would adhere to the principles of the vision for the South Campus District, as outlined in the Campus Master Plan 2015-2035. Landscaped areas would be installed west and south of the building within the project site. No substantial aesthetic or visual impacts are anticipated.</p>
<p>Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;</p>	<p>The Proposed Action is consistent with the policies in the 2018-2023 State C&D Plan. The selection of the project site, currently a paved parking facility, would conserve natural resources because there are no wetlands, watercourses or unique or rare natural communities within or immediately adjacent to the project site. Moreover, the project site is well-served by University transit services and public transportation. In addition, the Proposed Action is consistent with the policies outlined in the Second Draft of the 2025-2030 C&D Plan and the Town of Mansfield C&D Plan.</p>

	The Proposed Action is also consistent with the principles established within the Campus Master Plan 2015-2035.
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	The Proposed Action would not result in the disruption or division of an established community or impact housing. The Proposed Action is consistent with the Town of Mansfield’s C&D Plan.
Displacement or addition of substantial numbers of people;	The new School of Nursing Building wouldn’t displace people from, or add substantial numbers of people to, the area. Projected enrollment at the University is expected to remain relatively flat for the foreseeable future.
Substantial increase in congestion (traffic, recreational, other);	<p>It is not anticipated that the Proposed Action would result in an increase in existing or projected enrollment at the University or an increase in the number of vehicles on campus. The Proposed Action would require the removal of approximately 179 parking spaces that serve faculty and staff within Lot S in order to construct the new School of Nursing Building. However, it is not anticipated that this would result in a substantial increase in congestion. Faculty and staff parking spaces lost in Lot S represent approximately 1.5% of available parking on campus and would be redistributed across other existing parking facilities that have capacity. According to UConn Parking and Transportation Services, it is estimated that UConn has approximately 1,000 excess spaces across the campus. UConn Transportation Services operate shuttle buses, accessible vans, and small vehicles within the campus network. Several of UConn’s transit routes run along Bolton Road south of the project site, connecting the area with parking lots across the campus. The shift of parking to consolidated lots is consistent with campus master planning and the goal of prioritizing pedestrian circulation and access. UConn will continue to identify opportunities, as appropriate, to provide additional parking in the vicinity of the new School of Nursing Building. CTtransit and Windham Regional Transit District provide public transit to the South Campus through busses along Storrs Road.</p> <p>During construction there may be minor, temporary traffic disruptions in the vicinity of the project site. Impacts would be mitigated through traffic management planning, appropriate traffic management measures, and coordination with occupants of adjacent University buildings, ensuring that efficient traffic operations are maintained. Overall, the Proposed Action would not result in a substantial increase in congestion, either during construction or operation.</p>

A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	The new School of Nursing Building would employ geothermal heating and cooling, a form of renewable energy, through the adjacent South Campus Chiller Plant. In addition, the building would meet the requirements for LEED Gold Certification, at a minimum. Overall, the Proposed Action would not result in a substantial increase in the type or rate of energy use.
The creation of a hazard to human health or safety;	No new hazards to human health or safety would result from the Proposed Action. The campus community would be notified of all construction activities. In addition, during construction, fencing would be installed around the construction site, and sidewalk closures and detours would be clearly signed to make sure safe passage for pedestrians is provided. Adherence to OSHA Standards would ensure the safety of construction workers on the site.
Effect on air quality;	It is not anticipated that the Proposed Action would result in an increase in existing or projected enrollment at the University or an increase in the number of vehicles on campus or trips to campus. The University has a "Title V" permit for all sources of air pollutants on the campus. The contractor would be required to minimize, to the extent practical, all new air emissions and to coordinate all proposed new air emissions with the University's Office of Environmental Policy. Construction activities could result in temporary, short-term impacts to ambient air quality due to emissions from construction equipment and fugitive dust. The Proposed Action would not result in a substantial effect on air quality.
Effect on ambient noise levels;	Heavy equipment may cause temporary increases in noise levels during construction. However, there would be no long-term effects to ambient noise levels as a result of the Proposed Action.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	Through field review it was determined that there are no inland wetlands or watercourses within the project site. The majority of the site is a paved parking facility. Although the triangular grass parcel on the south side of the project site would be disturbed for the installation of utilities, landscaping would be restored following construction. Moreover, a landscaped area would be installed along the south and west sides of the project site, increasing greenspace within the larger project area. The project site is not located within the state's coastal boundary. There would be no direct, indirect, or cumulative impacts to land resources or wetlands.
Effect on agricultural resources;	There are no farmland soils within or adjacent to the project site. There would be no direct, indirect or cumulative impacts to agricultural resources.
Adequacy of existing or proposed utilities and infrastructure;	The new School of Nursing Building would tie into existing campus utilities. Heating and cooling would be provided through the recently-upgraded South Campus Chiller Plant. The Mirror Lake Improvements project (planned to begin in Spring 2025) has been designed to accommodate stormwater from a development of

	comparable size (accounting for two acres of impervious cover beyond the current residence hall and infrastructure projects). Adequate capacity is available for the project without resulting in direct, indirect, or cumulative impacts to utilities and infrastructure.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	<p>The heating and cooling for the new School of Nursing Building would be provided through the recently upgraded South Campus Chiller Plant which relies on geothermal energy, a renewable energy source. The Proposed Action would be consistent with the strategies, guidelines, and plans for increased energy efficiency described in various University plans and policies, including:</p> <ul style="list-style-type: none"> - Campus Sustainable Design Guidelines (2004) - UConn Climate Action Plan (2010, 2015) - UConn Renewable Energy Strategic Plan (2012) - Sustainability Framework Plan (2015) - Sustainable Design & Construction (LEED Policy, 2016) - 2020 Vision for Campus Sustainability and Climate Leadership (2016) <p>It is not anticipated that the Proposed Action would result in an increase in existing or projected enrollment at the University or an increase in the number of vehicles on campus or trips to campus. There would be no substantial direct or indirect effects to greenhouse gas emissions as a result of the Proposed Action.</p>
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	The new School of Nursing Building would not be substantially affected by a changing climate. The building is being designed to meet LEED Gold Certification, at a minimum. The project site is neither within nor adjacent to the 100- or 500-year floodplain and therefore it would not be prone to flooding. The design incorporates façade treatments to avoid solar gain. Moreover, the building is being designed to meet or exceed the goals established in the University’s Memorandum of Understanding with CT DEEP related to the Campus Drainage Master Plan and Campus Flood Management Certification.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	No additional substantial effects on natural, cultural, recreational, or scenic resources are anticipated.
Cumulative effects.	Development of the South Campus buildings and infrastructure will continue to be accomplished in accordance with the principles established within the Campus Master Plan 2015-2035. There would be no long-term cumulative effects as a result of the Proposed Action. Short-term construction period effects to transportation systems and parking would be minimized through transportation management planning.

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

General Permit for Discharge of Stormwater and Dewatering Wastewater Associated with Construction Activities (CT DEEP)

PART VI – Sponsoring Agency Comments and Recommendations

On August 8, 2023, the University published a Notice of Scoping in the *Environmental Monitor* to solicit comments for the project and announced a public meeting. A public scoping meeting was held on August 30, 2023, and the scoping period concluded on September 8, 2023. On March 5, 2024, the University published a Notice of Time Extension in the *Environmental Monitor* for a Post-Scoping Notice to be finalized on or before May 7, 2024. Based upon the comments received, recommendations reviewed in consultation with its environmental planning consultant, and the analysis documented this form, the University has determined preparation of an EIE for the Proposed Action is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

See attached.

April 15, 2024

Ms. Stephanie Dyer-Carroll
Fitzgerald & Halliday, Inc.
416 Asylum Street
Hartford, CT 06103
(sent via email to sdyer-carroll@fhistudio.com)

Subject: New School of Nursing Building at the University of Connecticut
Bolton Road
Mansfield (Storrs), Connecticut

Dear Ms. Dyer-Carroll:

The State Historic Preservation Office (SHPO) has reviewed the potential effects of the referenced project on historic properties. The proposed activities consist of constructing a new building and associated improvements for the School of Nursing at the University of Connecticut (University). The new four-story building would be located off Bolton Road near existing clinical, academic, and research space. In addition to a review pursuant to the Connecticut Environmental Policy Act, because the project will require a Stormwater Discharge permit, it also is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act.

SHPO concurs with the Area of Potential Effect (APE) delineated by Fitzgerald & Halliday, Inc. (FHI). The currently proposed project site consists of parking lots. Because of significant prior ground disturbances, it is unlikely that significant archaeological resources would be impacted by the proposed activities. FHI completed an inventory of buildings within the APE, none of which appear to retain the qualities of significance for listing on the National Register of Historic Places (NRHP). FHI also noted that the University of Connecticut Historic District – Connecticut Agricultural School, a property listed on the NRHP, is situated 650 feet northwest of the proposed building location. SHPO concurs with FHI that the new building is unlikely to be visible from the district and that the proposed project will not impact its character defining features. However, the School of Nursing currently is located in Storrs Hall, the earliest masonry building in the University of Connecticut Historic District. Constructed in 1906, Storrs Hall was designed by Davis and Brooks and set the pattern for subsequent historic residence halls. This building was incorporated into a master plan drawn by noted landscape architect Charles N. Lowrie in 1910. SHPO understands that the University would identify a new use for the structure. Our office is available for technical guidance and advice on re-use of historic structures to ensure that the University retains this significant structure and the unique character of its campus for future generations of students. With this comment taken into consideration, the proposed undertaking will have no adverse effect on historic properties.

This office appreciates the opportunity to review and comment upon this project. Do not hesitate to contact Catherine Labadia, Staff Archaeologist and Deputy State Historic Preservation Officer, for additional information at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,



Jonathan Kinney
State Historic Preservation Officer



Connecticut
Department of Energy &
Environmental Protection

portal.ct.gov/DEEP

2/21/2024

Ron Gautreau
FITZGERALD & HALLIDAY, INC.
416 Asylum St
Hartford, CT 06103
rgautreau@fhstudio.com

Subject: New School of Nursing Building at the University of Connecticut

Filing #: 107057

NDDB - New Determination Number: 202401995

Expiration Date: 2/21/2026

I have reviewed Natural Diversity Data Base (NDDB) maps and files regarding the area of work provided for the proposed construction of a new School of Nursing Building at the University of Connecticut, largely within the paved surface parking lot (Lot S) in South Campus, Bolton Rd, Storrs Mansfield, Connecticut. I do not anticipate negative impacts to State-listed species (RCSA Sec. 26-306) resulting from your proposed activity at the site based upon the information contained within the NDDB.

Your submission information indicates that your project requires a state permit, license, registration, or authorization, or utilizes state funding or involves state agency action. This NDDB - New determination may be utilized to fulfill the Endangered and Threatened Species requirements for state-issued permit applications, licenses, registration submissions, and authorizations.

Please be aware of the following limitations and conditions:

Natural Diversity Database information includes all information regarding listed species available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Database and accessed through the ezFile portal as it becomes available. New information may result in additional review, and new or modified restrictions or conditions may be necessary to remain in compliance with certain state permits.

- During your work listed species may be encountered on site. A report must be submitted by the observer to the Natural Diversity Database promptly and additional review and restrictions or conditions may be necessary to remain in compliance with certain state permits. Please fill out the [appropriate survey form](#) and follow the instructions for submittal.
- Your project involves the state permit application process or other state involvement, including state funding or state agency actions; please note that consultations with your permit analyst or the agency

may result in additional requirements. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division may be necessary and additional information, including but not limited to species-specific site surveys, may be required. Any additional review may result in specific restrictions or conditions relating to listed species that may be found at or in the vicinity of the site.

- If your project involves preparing an Environmental Impact Assessment, this NDDDB consultation and determination should not be substituted for biological field surveys assessing on-site habitat and species presence.
- The NDDDB - New determination for the New School of Nursing Building at the University of Connecticut as described in the submitted information and summarized at the end of this document is valid until 2/21/2026. This determination applies only to the project as described in the submission and summarized at the end of this letter. Please re-submit an updated Request for Review if the project's scope of work and/or timeframe changes, including if work has not begun by 2/21/2026.

If you have further questions, please contact me at the following:

Karen Zyko
CT DEEP Bureau of Natural Resources
Wildlife Division
Natural Diversity Database
79 Elm Street
Hartford, CT 06106-5127
(860) 424-3378
Karen.Zyko@ct.gov

Please reference the Determination Number 202401995 when you e-mail or write. Thank you for consulting the Natural Diversity Data Base.

Karen Zyko
Wildlife Division- Natural Diversity Data Base
79 Elm Street
Hartford, CT 06106-5127
(860) 424-3378
Karen.Zyko@ct.gov

Application Details:

Project involves federal funds or federal permit:	No
Project involves state funds, state agency action, or relates to CEPA request:	Yes
Project requires state permit, license, registration, or authorization:	Yes
DEEP enforcement action related to project:	
Project Type:	Building and Infrastructure Development (including stormwater discharge associate with construction)
Project Sub-type:	New Commercial, Industrial, Governmental
Project Name:	New School of Nursing Building at the University of Connecticut
Project Description:	

Summary of Scoping Comments and Responses

Commentor	Topic	Comment	Response
Town of Mansfield (by letter September 12, 2023)	Parking	The proposed location of the new building currently serves as parking for the Human Development Center and Communication Sciences Building. Removing these parking spaces and replacing them with a building with parking demand will increase the burden on the already overtaxed parking capacity of UConn's campus and the Town of Mansfield's surrounding streets. While the Town of Mansfield has no jurisdiction over the University of Connecticut's parking plan, a decrease in on-campus parking is likely to spill onto town roads and increase Mansfield's difficulties with parking.	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S. The public parking for the Human Development Center and Communication Sciences Building within the existing circular drive would be maintained. While construction of the new School of Nursing building within Lot S would require the removal of approximately 179 permitted parking spaces that serve faculty and staff, parking permits would be redistributed across other existing surface lots that have capacity. According to UConn Parking and Transportation Services, it is estimated that UConn has approximately 1,000 excess spaces across the campus. UConn Transportation Services operates shuttle buses, accessible vans, and small vehicles within the campus network. Several of UConn's transit routes run along Bolton Road south of the project site, connecting the area with parking lots across the campus. The shift of parking to consolidated lots is consistent with campus master planning and the goal of prioritizing pedestrian circulation and access. UConn will continue to identify opportunities, as appropriate, to provide additional parking in the vicinity of the new School of Nursing Building.
Town of Mansfield (by letter September 12, 2023)	Stormwater	The proposed location of the new building includes a landscape island that appears to function as a stormwater detention basin, aiding in the capture and infiltration of runoff from the nearby hills and hardscape along Alethia Drive. Considerations will need to be made to ensure that the stormwater control function currently being fulfilled by this basin is maintained during construction and that the land previously being served by this basin continues to receive proper	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S. Therefore, the stormwater management feature within the center of the circular drive will be maintained. Stormwater management for the new building would be designed consistent with the campus-wide Drainage Master Plan. All work during construction would be conducted consistent with the 2023

Commentor	Topic	Comment	Response
		stormwater capture and treatment at the completion of construction.	<i>Connecticut Guidelines for Soil Erosion and Sediment Control.</i>
John Cooley (by email September 7, 2023)	Visual Resources/Aesthetics	The proposed site is quite small. The existing school of nursing (Storrs Hall) would not fit comfortably within this site; thus, a new school of nursing with much larger square footage would necessarily need to be quite tall and blocky, if located in this courtyard. A tall, blocky building would crowd its neighbors and lack symbolic presence as an icon of the School of Nursing.	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S. The circular drive and adjacent greenspace would be maintained. The new building would be consistent in height with adjacent buildings, including the South Campus Residence Hall and the Louisa J. Rosebrooks Residence Hall, and would adhere to the principles of the vision for the South Campus District, as outlined in the Campus Master Plan. Landscaped areas would be installed west and south of the building within the project site.
John Cooley (by email September 7, 2023)	Potential for Expansion	The proposed site is hemmed in by other buildings. A new building shoehorned onto this site would have limited possibilities for future expansion.	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S.
John Cooley (by email September 7, 2023)	Housing, Population and Communities	The proposed site is in a location that is transitional between university uses and neighborhood housing. The residential neighborhood behind Bolton Road Extension is the premiere example in Mansfield of a walkable, low-impact neighborhood (a "15 minute neighborhood") with a mix of residents. Anything that pushes high-impact university functions closer to this neighborhood reduces its quality and attractiveness.	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S, away from the Bolton Road residences.
John Cooley (by email September 7, 2023)	Site Selection	A much more appropriate site would be on the south end of Parking Lot S. Given UCONN's efforts to present itself as a "green" campus and achieve carbon neutrality, a surface parking lot is just about the worst possible use of that space. Replacing an impervious asphalt surface that sits astride a key watershed with a modern, "green" building would showcase the university's	Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S. The new School of Nursing Building would have LEED Gold certification, at a minimum.

Commentor	Topic	Comment	Response
		commitment to counteract climate change and engage in better land use practices.	
CT DEEP (by letter September 8, 2023)	Air Quality	The construction of the new School of Nursing building on Alethia Drive, South Campus in Storrs may require the use of equipment that impacts air resources. UCONN should be mindful of whether the construction/operation of equipment such as boilers and/or emergency engines, etc. will meet the New Source Review (NSR) applicability requirements under RCSA Section 22a-174-3a, trigger any Federal Regulation, or if such equipment will be eligible to operate under the exemptions of RCSA Section 22a-174-3b. Additionally, UConn/Storrs campus operates under a premise wide operating permit, Title V Permit No. 098-0029-TV. Should it be determined that the proposed project may trigger any New Source Review or applicable federal requirements, UConn must also evaluate whether a modification to their Title V permit will be required.	Comment noted for design development.
CT DEEP (by letter September 8, 2023)	Threatened and Endangered Species	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.	A request for NDDDB review was submitted to CT DEEP. A response was received on February 21, 2024 indicating that no negative impacts to state-listed species are anticipated.
CT DEEP (by letter September 8, 2023)	Stormwater	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 was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction as well as addressing discharges of	Comment noted for design and construction. University of Connecticut projects incorporate design features to meet or exceed stormwater management goals with respect to our Memorandum of Understanding with CT DEEP related to the <i>Campus Drainage Masterplan</i> and Campus Flood Management Certificates.

Commentor	Topic	Comment	Response
		<p>other stormwater pollutants from the site long term.</p> <p>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). 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</p>	

Commentor	Topic	Comment	Response
		<p>control measures for runoff reduction and low impact development practices.</p> <p>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.</p>	
CT DEEP (by letter September 8, 2023)	Stormwater/Water Quality	Runoff from the proposed facility would likely flow in the direction of Roberts Brook which has a water quality assessment of Not Supporting Aquatic Life. Due to the impairment, proper management measures for stormwater and	Comment noted for design and coordination with the Mirror Lake Improvements Project. The Mirror Lake Improvements project (planned to begin in Spring 2025) has been designed to accommodate stormwater from a development of comparable size

Commentor	Topic	Comment	Response
		<p>sediment should be taken as to not further impact downstream surface waters, including Roberts Brook. Addressing stormwater quality, quantity, and drainage issues on-site is a priority in the UConn Master Plan. CT DEEP supports UConn in implementing this plan throughout the campus, including this proposed development.</p>	<p>(accounting for two acres of impervious cover beyond the current residence hall and infrastructure projects). Stormwater design measures integrated into the proposed project will be consistent with the 2023 <i>Connecticut Stormwater Quality Manual</i>.</p>
<p>CT DEEP (by letter September 8, 2023)</p>	<p>Air Quality</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Comment noted for design and construction.</p>

Commentor	Topic	Comment	Response
		<p>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.</p>	
<p>Roland Perreault (public scoping meeting August 30, 2023)</p>	<p>Stormwater</p>	<p>In the middle of the circle on Alethia is a large catch basin. How will elimination of that be mitigated?</p>	<p>Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S so the catch basin will not be eliminated. Stormwater design measures integrated into the proposed project will be consistent with the 2023 <i>Connecticut Stormwater Quality Manual</i>.</p>
<p>Roland Perreault (public scoping meeting August 30, 2023)</p>	<p>Parking</p>	<p>One assumption is that access to the Human Development Building and Speech Building will be considered. The 41 parking spaces are used for patients visiting those sites. Where will they park and how will those spaces still be accessible?</p>	<p>Based on public comments, and further investigation of alternative siting options, the building has been shifted east to the southern end of Lot S. The public parking for the Human Development Center and Communication Sciences Building within the existing circular drive would be maintained.</p>
<p>Janice Boltseridge (public scoping meeting August 30, 2023)</p>	<p>Site Selection</p>	<p>Do you have comparable information on the Hillside Ave site?</p>	<p>A fit study was completed for the alternative site, and it was determined to be unsuitable.</p>

Antonia Moran
Mayor

September 12, 2023

Antoaneta Fedeles, AIA, PMP, LEED AP
University Planning, Design & Construction
3 Discovery Drive, U-6038,
Storrs, CT 06269
Via Email: antoaneta.fedeles@uconn.edu

Subject: Nursing Building CEPA Scoping Comments

Dear Ms. Fedeles:

The Mansfield Town Council and Planning and Zoning Commission (PZC) offer the following comments and recommendations with regard to the proposed New School of Nursing Building, consistent with the CEPA Scoping Process:

- *Parking.* The proposed location of the new building currently serves as parking for the Human Development Center and Communication Sciences Building. Removing these parking spaces and replacing them with a building with parking demand will increase the burden on the already overtaxed parking capacity of UConn's campus and the Town of Mansfield's surrounding streets. While the Town of Mansfield has no jurisdiction over the University of Connecticut's parking plan, a decrease in on-campus parking is likely to spill onto town roads and increase Mansfield's difficulties with parking.
- *Stormwater management.* The proposed location of the new building includes a landscape island that appears to function as a stormwater detention basin, aiding in the capture and infiltration of runoff from the nearby hills and hardscape along Alethia Drive. Considerations will need to be made to ensure that the stormwater control function currently being fulfilled by this basin is maintained during construction and that the land previously being served by this basin continues to receive proper stormwater capture and treatment at the completion of construction.

We thank you for providing the Town the opportunity to comment on this project and for receiving these comments outside of the normal comment period. 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. August 31, 2023 Memo from M. Stankov and J. Kaufman to the Mansfield Planning and Zoning Commission

cc: Town Council
Planning and Zoning Commission

MEMO

To: Planning and Zoning Commission
From: Michael Stankov, Environmental Planner
Jennifer Kaufman, AICP, Director
Date: August 31, 2023
Subject: New Nursing Building on UConn Campus - CEPA Scoping

On August 8, 2023, a Notice of Scoping was published in the [Connecticut Environmental Monitor](#) indicating that the University of Connecticut is planning to construct a new School of Nursing building on Alethia Drive within its South Campus in Storrs. Currently the School of Nursing entirely resides in Storrs Hall on the north side of campus. The new School of Nursing building would be strategically located between existing clinical, academic, and research space, and align with the long-term development plan outlined in the 2015-2035 Campus Master Plan.

The Proposed Action to be assessed under the Connecticut Environmental Policy Act (CEPA) would be the construction of an up-to 4-story building approximately 70,000-80,000 gross square feet (gsf) in size. The purpose of this project is to accommodate increased enrollment for the School of Nursing, as Storrs Hall cannot adequately satisfy anticipated future requirements in terms of size and spatial configuration. Additional project information is available at <https://updc.uconn.edu/nursing/>.



There was an online public scoping meeting on Wednesday, August 30, 2023, at 6 pm for this proposed action and a video of the meeting will be available after the meeting at this same website. Staff attended this meeting to obtain information and listen to public comment.

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 Friday, September 8, 2023. However, due to the timing, UConn has agreed to allow the Town to submit its comments after the September 11, 2023 meeting.

POTENTIAL IMPACTS

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. The following comments and concerns have been identified by staff:

- *Parking (22a-1a-3(11))*. The proposed location of the new building currently serves as parking for the Human Development Center and Communication Sciences Building. Removing these parking spaces and replacing them with a building with parking demand will increase the burden on the already overtaxed parking capacity of UConn's campus and the Town of Mansfield's surrounding streets. While the Town of Mansfield has no jurisdiction over the University of Connecticut's parking plan, a decrease in on-campus parking is likely to spill onto town roads and increase Mansfield's difficulties with parking.
- *Stormwater management (22a-1a-3(1))*. The proposed location of the new building includes a landscape island that appears to function as a stormwater detention basin, aiding in the capture and infiltration of runoff from the nearby hills and hardscape along Alethia Drive. Considerations will need to be made to ensure that the stormwater control function currently being fulfilled by this basin is maintained during construction and that the land previously being served by this basin continues to receive proper stormwater capture and treatment at the completion of construction.

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 in conjunction with the Town Council regarding the construction of a new School of Nursing building on Alethia Drive. Said comments shall be based on the staff memo dated August 31, 2023, prepared by Environmental Planner, Michael Stankov [with the following changes:].

From: [Cooley, John](#)
To: [Fedeles, Antoaneta](#)
Subject: New School of Nursing Building
Date: Thursday, September 7, 2023 8:23:08 AM

Dear Antoaneta:

I would like to submit the following comments with respect to the new school of nursing building proposed for the courtyard between the Nayden Clinic and the Communication Sciences Building.

First, the proposed site is quite small. The existing school of nursing (Storrs Hall) would not fit comfortably within this site; thus, a new school of nursing with much larger square footage would necessarily need to be quite tall and blocky, if located in this courtyard. A tall, blocky building would crowd its neighbors and lack symbolic presence as an icon of the School of Nursing.

Second, the proposed site is hemmed in by other buildings. A new building shoehorned onto this site would have limited possibilities for future expansion.

Third, the proposed site is in a location that is transitional between university uses and neighborhood housing. The residential neighborhood behind Bolton Road Extension is the premiere example in Mansfield of a walkable, low-impact neighborhood (a “15 minute neighborhood”) with a mix of residents. Anything that pushes high-impact university functions closer to this neighborhood reduces its quality and attractiveness.

Finally, a much more appropriate site would be on the south end of Parking Lot S. Given UCONN’s efforts to present itself as a “green” campus and achieve carbon neutrality, a surface parking lot is just about the worst possible use of that space. Replacing an impervious asphalt surface that sits astride a key watershed with a modern, “green” building would showcase the university’s commitment to counteract climate change and engage in better land use practices.

Thank you for your consideration,

[Dr. John R. Cooley](#)

Faculty Assessment Fellow

[Department of Ecology and Evolutionary Biology](#)

[University of Connecticut | Hartford Campus](#)

10 Prospect Street | Hartford, CT 06103

Phone: (959) 200-3908 | he/him/his

[\[Make an Appointment\]](#) [\[Visit the Cicada Project\]](#)



To: Antoaneta Fedeles, University Planning, Design, and Construction, University of Connecticut
From: Linda Brunza, Environmental Analyst
Telephone: 860-424-3739

Email: Linda.Brunza@ct.gov

Date: 9/8/2023

Subject: Scoping Notice for the construction of a School of Nursing building on Alethia Drive, South Campus, Storrs

Staff at the Department of Energy and Environmental Protection (DEEP) have reviewed the scoping notice for the planned construction of a School of Nursing building on the South Campus. The building will encompass approximately 70,000-80,000 square feet and will contain a wet lab, classrooms, an academic center, and support offices. Parking is also proposed for the building, as well as open space.

The following comments are submitted for your consideration. The first section contains information on DEEP's regulatory programs that may require permits for the project. There will be information linked to DEEP's website as well as contact information. The links and contact are there to help guide the applicant and sponsoring agency to determine if permits are required after the project moves closer to design and construction. These comments are meant to provide an overall analysis of the area, since scoping notices tend to be at the beginning stages of a project with no set design plans. After the list of potential permits, there will be comments from various divisions that are meant for informational purposes and best management practices.

Permitting/ Regulatory Programs

Air Bureau, Permitting Group

Contact: Lidia.Howard@ct.gov

The construction of the new School of Nursing building on Alethia Drive, South Campus in Storrs may require the use of equipment that impacts air resources. UCONN should be mindful of whether the construction/operation of equipment such as boilers and/or emergency engines, etc. will meet the New Source Review (NSR) applicability requirements under RCSA Section 22a-174-3a, trigger any Federal Regulation, or if such equipment will be eligible to operate under the exemptions of RCSA Section 22a-174-3b. Additionally, UConn/Storrs campus operates under a premise wide operating permit, Title V Permit No. 098-0029-TV. Should it be determined that the proposed project may trigger any New Source Review or applicable federal requirements, UConn must also evaluate whether a modification to their Title V permit will be required.

Natural Diversity Database (NDDB)

Contact: Robin.Blum@ctgov

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](#).

Information/ Best Management Practices

Stormwater and Dewatering Wastewaters from Construction Activities General Permit

Contact: Bureau of Materials Management and Compliance Assurance, Permitting and Enforcement Division: DEEP.stormwaterstaff@ct.gov

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 was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction as well as addressing discharges of other stormwater pollutants from the site long term.

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). 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.

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 [ezFile Portal](#). Additional information can be found on-line at: [Construction Stormwater GP](#).

Water Planning and Management Division

Contact: Emma.Coffey@ct.gov

Runoff from the proposed facility would likely flow in the direction of Roberts Brook which has a water quality assessment of Not Supporting Aquatic Life. Due to the impairment, proper management measures for stormwater and sediment should be taken as to not further impact downstream surface

waters, including Roberts Brook. Addressing stormwater quality, quantity, and drainage issues on-site is a priority in the [UConn Master Plan](#). CT DEEP supports UConn in implementing this plan throughout the campus, including this proposed development.

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