



MEMORANDUM

To: Council on Environmental Quality (CEQ)
From: Robert Corbett, Executive Director
University Planning, Design, and Construction
Date: October 18, 2022
Subject: Memorandum of Findings and Determination
South Campus Residence Hall Project at the University of Connecticut

The University of Connecticut (the University) is planning a design-build project on its South Campus in Storrs – roughly bounded by Mansfield Road to the east, Maple Lane to the south, the Anna M. Snow Residence Hall to the west, and Gilbert Road to the north. Known as the “South Campus Residence Hall Project,” the Proposed Action assessed under the Connecticut Environmental Policy Act (CEPA) process consisted of the following main project elements:

- A new residence hall and dining facility comprised of approximately 200,000 net square feet with 650-660 beds and 500 dining seats
- Utility and infrastructure improvements, and tie-ins to existing utilities

On November 16, 2021, the University published a Notice of Scoping in the *Environmental Monitor* to solicit comments for the project and announced a public meeting. The public scoping meeting was held on December 8, 2021, and the scoping period concluded on December 16, 2021. During this time, in addition to receiving comments from the public, the University received comments from the Connecticut Department of Energy and Environmental Protection (CTDEEP), Preservation Connecticut (PCT), and the State Historic Preservation Office within the Connecticut Department of Economic and Community Development (SHPO). On May 17, 2022, the University published a Notice of Time Extension in the *Environmental Monitor* for a Post-Scoping Notice to be finalized on or before November 8, 2022.

Based upon the comments received, recommendations reviewed in consult with its environmental planning consultant, continued coordination with SHPO and PCT, and the analysis documented in the Environmental Assessment Checklist, the University has determined preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted. Accordingly, a Post-Scoping Notice and an Environmental Review Checklist with attachments are hereto submitted for publication in the *Environmental Monitor* on October 18, 2022 and shall satisfy the agency’s responsibilities under [Section 22a-1a-7 of the Regulations of Connecticut State Agencies](#) (RCSA).



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

Instructions for Use:

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

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

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

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

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

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

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



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

PART I – Initial Review and Determination

Date: October 18, 2022
Name of Project/Action: South Campus Residence Hall
Project Address(es): Gilbert Road at the University of Connecticut, Storrs
Affected Municipalities: Mansfield

Sponsoring Agency(ies): University of Connecticut
Agency Project Number, if applicable: 300200
Project Funding Source(s)/Program(s): 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 University of Connecticut (the University or UConn) has met with SHPO and Preservation Connecticut (PCT) multiple times over the last ten months to address the potential adverse impact the Project could have on historic resources located within the University of Connecticut Historic District (Historic District). With the assistance of SHPO and PCT, UConn has identified measures that minimize and mitigate such adverse effects. The parties had hoped to memorialize the mitigation measures as more fully described in the attached letter dated August 26, 2022, but the parties have been unable to reach a final agreement on scope. Notwithstanding the inability to memorialize the mitigation measures, UConn recognizes SHPO's and PCT's desire to preserve 4 Gilbert Road, rather than demolish it. As such, UConn has approved a budget in the amount of \$6.6 million to implement many of the suggested mitigating measures including the relocation of 4 Gilbert Road to another site located within the boundaries of the University of Connecticut Historic District and other preservation efforts.

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: Fuss & O'Neill, Inc. on behalf of University Planning, Design and Construction at the University of Connecticut

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 University of Connecticut has recognized the importance of on-campus student housing as part of the overall educational experience offered by the University and has consistently had one of the highest on-campus residency rates in the nation at 65-70%. As part of the vision for sustaining excellence in undergraduate education articulated in the Campus Master Plan, enhancing living/learning communities, and expanding opportunities for on-campus housing were identified as key priorities. The Proposed Action will help improve current and future living/learning communities by alleviating wait times at other on-campus dining facilities during peak meal hours through the creation of additional dining space. Additionally, while the projected enrollment at the University of Connecticut is expected to remain generally flat for the foreseeable future, much of the existing on-campus housing stock needs renewal. The Proposed Action will create much needed capacity to take other housing facilities offline for renovation and modernization while still maintaining housing options for on-campus residency.

Description of the Proposed Action:

The Proposed Action consists of the construction of a suite-style residence hall and dining facility. The approximately 200,000 net square foot facility will include approximately 650-660 beds and 500 dining seats, as well as provide common and lounge spaces, meeting and seminar rooms, multipurpose spaces, laundry, and bicycle storage. The facility will be constructed to meet LEED Gold and CT High Performance Building Standards and will tie into existing campus facilities.

Alternatives Considered:

The University considered the No Action Alternative, as well as alternatives at three other locations on campus: (1) a site just south of McMahon Residence Hall, (2) the location of the existing S Lot parking area on the South Campus, and (3) a site near the other South Campus Residence Halls along Gilbert Road.

No Action Alternative - Under the No Action Alternative, the residence hall and dining facility would not be constructed, and the needs identified in the 2015 Master Plan could not be met. Without the Proposed Action, the University will lack sufficient on-campus residential capacity and could not renovate other residence halls. In addition, the currently existing dining halls will continue to experience unacceptably long wait times. The convenience and availability of dining and on-campus residency are

substantial factors impacting the overall student experience. Consequently, the No Action Alternative would fail to meet the purpose and needs identified and is not feasible or prudent.

Alternative Sites

The University reviewed alternative sites on campus for the Proposed Action.

South of McMahon Residence Hall – This sloping site would present construction challenges due to its topography, including a shallow depth to ledge. This site would also require the removal of a roadway connecting Hillside Road to Y-lot (i.e., the Commuter Student Lot), which would disrupt traffic patterns in the area and potentially impact commuter parking. Given the foregoing, and despite identification in the Campus Master Plans a potential long-term site for student housing, it is not a feasible alternative at this time.

S-Lot Parking Area – Use of this site for the Proposed Action would, in the short term, result in the loss of nearly 300 parking spaces on campus. In the Campus Master Plan, this area is identified as part of the Southern Woodland Corridor (with a new parking structure located adjacent to Bolton Road). Development of a residence and dining hall at this site would create parking capacity challenges in the short-term and potentially conflict with the long-term vision for establishing the South Woodland Corridor. Because UConn has more than 10,000 commuter students, in addition to employees, faculty, staff and others who need to park on campus, reducing parking capacity is not feasible. As a result, the site is not consistent with master planning for the Storrs Campus and is not a feasible alternative for the Proposed Action.

South Campus Along Gilbert Road – This location is near the intersection of Gilbert Road and Mansfield Road, located north of the existing residence hall complex in the South Campus and currently consists primarily of lawn and sidewalk area, except for an old residential structure located at 4 Gilbert Road. This area was identified in the 2015 Campus Master Plan as a site for near-term residence hall construction given its location proximal to an existing residence hall community (South Campus), availability of existing utilities and other infrastructure, and consistency with the vision of a campus core. The site is partially located within the University of Connecticut Historic District. Removal of the “Brown Houses” along Gilbert Road (contributing resources to the Historic District) was discussed in the 2017 South Campus Development Environmental Impact Evaluation. The University of Connecticut has been working with SHPO and PCT for months to mitigate the potential adverse effects initially identified through those prior projects subject to CEPA. This location was identified as the preferred alternative for the Proposed Action given its ability to meet the purpose and need for the Project while providing consistency with short and long-term campus master planning.

Public concerns or controversy associated with the proposed action:

SHPO and PCT submitted comments concerning the potential adverse impact on the historic resources located near the Project site, including the demolition of 4 Gilbert Road. UConn has agreed that it will not demolish 4 Gilbert Road and has approved a budget in the amount \$6.6 million to relocate 4 Gilbert Road and fund other preservation efforts.

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).

The proposed project site is partially located within the University of Connecticut Historic District - Connecticut Agricultural School, which is listed on the National Register of Historic Places.

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

Required Factors for Consideration (Section 22a-1a-3 of the RCSA)	Agency’s Assessment and Explanation
Effect on water quality, including surface water and groundwater;	The Proposed Action will not result in any direct impacts to wetlands and watercourses, as 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 will include best management practices to avoid direct, indirect, or cumulative impacts to water quality.
Effect on a public water supply system;	The Utility Framework for the Campus completed in 2017 included a residence hall and dining facility of comparable size, so no direct, indirect, or cumulative adverse impacts on campus water supply capacity are anticipated. Additionally, no direct or indirect impacts to quality or quantity of any other public water supply is anticipated.
Effect on flooding, in-stream flows, erosion or sedimentation;	<p>Flooding No negative impacts are anticipated. The project is not located within Connecticut’s coastal boundary, nor is the project within mapped Federal Emergency Management Agency (FEMA) floodplain. Stormwater management will be consistent with the campus-wide drainage master plan, so that no increase to downstream flooding in Mirror Lake/Roberts Brook will occur.</p> <p>In-stream Flows No direct, indirect, or cumulative impacts to flows in the Roberts Brook watershed are anticipated.</p> <p>Erosion or Sedimentation No direct, indirect, or cumulative impacts are anticipated from either the construction or operation of the residence hall and dining facility.</p> <p>All work during construction will be consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended.</p>
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	After several meetings with SHPO and PCT, UConn has identified measures that minimize and mitigate potential adverse effects resulting from construction of the Project within the University of Connecticut Historic District. UConn has approved a budget in the amount \$6.6 million to implement such measures including the relocation of 4 Gilbert Road to another site located within the boundaries of the University of Connecticut Historic District and other preservation efforts.

setting; OR B. Disruption of an archeological or sacred site;	
Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species;	The University of Connecticut coordinated with the Natural Diversity Database (NDDDB) regarding the potential presence of state-listed species. Correspondence from NDDDB indicated that no negative impacts to species are anticipated. As a result – and given the developed and lawn-like nature of site – no direct, indirect or cumulative impacts to natural communities, critical species or their habitat or movement of any species.
Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	Operation of the residence hall and dining facility will not result in the introduction of any new such materials on campus. Existing protocols such as those established by the University’s Division of University Safety, Environmental Health and Safety will ensure that no unreasonable adverse effects are anticipated to result from the Proposed Action. During the project construction phase, there will be temporary on-site storage and use of fuels and other materials associated with construction vehicles and equipment, but best management practices will be in place during the construction phase to avoid any adverse effects to the environment.
Substantial aesthetic or visual effects;	The design of the proposed residence hall and dining facility will be consistent with the campus district vision established as part of the Campus Master Plan, including guidelines for massing and urban form and specific guidelines for the South Campus District. As a result, no substantial adverse aesthetic or visual effects are anticipated.
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>The proposed project is consistent with the policies of the State C&D Plan. The proposed project is an infill development currently served by infrastructure that will meet the needs of the new development. The proposed project promotes walkability and is located within one-half mile of public transportation facilities. The project area avoids negatively affecting natural areas and unique or rare ecological communities, and wetlands and watercourses, as these resources are not present in the project area.</p> <p>The proposed project is in the Town of Mansfield Institutional (I) zoning district and does not conflict with uses permitted in the institutional zone, although the University as a State entity is not subject to local zoning.</p> <p>The proposed project is consistent with the University’s Campus Master Plan, which identifies an initiative to expand on-campus housing in the South Campus District.</p>
Disruption or division of an established community or inconsistency with adopted	This project is not in conflict with any municipal, regional, or State plans, and it is consistent with the University’s Campus Master Plan. The Proposed Action will strengthen the sense of residential community on the Storrs Campus and will not result in

<p>municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;</p>	<p>any disruption or division of an established community or impact on housing.</p>
<p>Displacement or addition of substantial numbers of people;</p>	<p>No direct, indirect, or cumulative impacts are anticipated. Projected enrollment at The University is expected to remain relatively flat for the foreseeable future. The purpose of this project is to create the capacity to take other housing facilities offline for renovation and modernization over the next decade (or longer).</p>
<p>Substantial increase in congestion (traffic, recreational, other);</p>	<p>Minor, temporary disruptions to traffic in the immediate area of construction may occur during the construction period, but impacts will be mitigated by implementing logistic plans, stakeholder meetings, and appropriate traffic management measures that would maintain efficient traffic operations during the construction period. Additionally, post-construction direct, indirect or cumulative impacts are not anticipated, as the Proposed Action will not result in an increase in the number of vehicles on campus or an increase in the campus population.</p>
<p>A substantial increase in the type or rate of energy use as a direct or indirect result of the action;</p>	<p>The proposed facility will be the first on the University’s Storrs campus proposed to utilize geothermal heat pumps, a renewable energy form, for heating a cooling. In addition to meeting the requirements for LEED Gold Certification and the CT High Performance Building Standards, there will be energy modeling and review of the “Whole Building Energy Use” during the design phase (prior to the completion of Design Development). The Design Build team for the project will pursue targeted metrics for the Whole Building “Energy Use Intensity” Reduction Path for Commercial New Construction or Major Renovation, under Path 2, with a target of achieving a 10% improvement over a baseline building “Energy Use Intensity” as stipulated by Eversource.</p>
<p>The creation of a hazard to human health or safety;</p>	<p>The Proposed Action will result in activities like those already occurring on campus. Sufficient public health & safety services are in place for students, faculty, staff, and visitors. No new hazards to human health and safety will result from the Proposed Action.</p>
<p>Effect on air quality;</p>	<p>The University has a campus-wide “Title V” permit for all sources of air pollutants. The Design-Build team for the Proposed Action will be required to minimize, to the extent practical, all new air emissions and will be responsible for coordinating all proposed new air emissions with the University’s Office of Environmental Policy (OEP). This includes any necessary calculations and/or documentation of air emitting sources required to demonstrate compliance with the University’s Title V permit.</p> <p>No direct, indirect, or cumulative impacts to air quality are anticipated from the operation of the residence hall and dining</p>

	<p>facility. No new mobile source air emissions are anticipated, and no new significant station sources of emissions are anticipated. The project will be in compliance with the campus-wide Title V permit for all sources of air pollutants. Construction activities may result in temporary, short-term impacts to ambient air quality due to direct emissions from construction equipment and fugitive dust.</p>
Effect on ambient noise levels;	<p>No direct, indirect, or cumulative impacts to ambient noise levels from the operation of the residence hall and dining facility are anticipated as these building types/land uses are consistent with the current activities in the South Campus area. Heavy construction equipment associated with site development may result in temporary increases in noise levels in the immediate area of construction.</p>
Effect on existing land resources and landscapes, including coastal and inland wetlands;	<p>No adverse effects to existing land resources and landscapes are anticipated as the project does not impact wetlands and is not located within Connecticut’s coastal boundary. There are no unique features or geologic features in the project area.</p>
Effect on agricultural resources;	<p>The proposed project site is located within the current developed campus footprint on an existing lawn area. In addition, there are no farmland soils in the project area. No direct, indirect, or cumulative adverse effects to agricultural resources.</p>
Adequacy of existing or proposed utilities and infrastructure;	<p>The Residence Hall and Dining Facility will tie into campus utilities and will be served by the South Campus Utility Plant. A residence hall and dining facility of this size with similar utility demand was included in the 2017 Framework Utility Analysis for the Campus, and adequate capacity is available for the project without resulting in direct, indirect, or cumulative adverse impacts to utilities and infrastructure.</p>
Effect on greenhouse gas emissions as a direct or indirect result of the action;	<p>The new facility will include renewable energy sources such as geothermal wells and fuel cells to offset a nominal increase in energy consumption, and the proposed action will be consistent with the strategies, guidelines, and plans for increased energy efficiency and use of renewables described in the following University plans and policies:</p> <ul style="list-style-type: none"> • Campus Sustainable Design Guidelines (2004) • Sustainable Design & Construction (LEED Policy, 2016) • UConn Climate Action Plan (2010, 2015) • 2020 Vision for Campus Sustainability and Climate Leadership (2016) • UConn Renewable Energy Strategic Plan (2012) • Sustainability Framework Plan (2015)
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	<p>The residence hall and dining facility will meet the criteria for LEED Gold Certification and CT High Performance Building Standards (16a-38k-1 et seq.). In addition, the project will utilize heat pumps for heating and cooling, reducing reliance on fuel-burning equipment, and will include a thermal storage tank to alleviate</p>

	peak cooling demand in anticipation of more days of higher temperatures in Connecticut.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	No additional substantial effects are anticipated.
Cumulative effects.	Potential cumulative effects associated with the Project are related to the University of Connecticut Historic District. UConn has identified measures that will minimize and mitigate the potential adverse effects resulting from construction of the Project within the University of Connecticut Historic District. These measures include relocating 4 Gilbert Road to a new site within the University of Connecticut Historic District and funding other preservation efforts. UConn has approved a budget in the amount \$6.6 million to implement such measures.

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

Anticipated permits, approvals, and/or certifications include the following:

- **Office of the State Traffic Administration (OSTA) Administrative Decision Review** - The project will qualify as an expansion under Section 14-312-1 of the OSTA regulations. A new Major Traffic Generator Certificate for the campus will not be required.
- **Flood Management Certification (CTDEEP Bureau of Water Protection and Land Reuse's Inland Water Resources Division)** – Required for alteration of the drainage system
- **General Permit for Discharge of Stormwater and Dewatering Wastewater Associated with Construction Activities (CTDEEP Bureau of Materials Management and Compliance Assurance)** – Registration required since total site disturbance exceeds 1 acre
- **General Permit for Discharges from Miscellaneous Industrial Users (CTDEEP Water Permitting and Enforcement)** – Required for hydrostatic pressure testing of water or natural gas lines.

Additional permits and approvals may be identified during the design process.

PART VI – Sponsoring Agency Comments and Recommendations

On November 16, 2021, the University published a Notice of Scoping in the *Environmental Monitor* to solicit comments for the project and announced a public meeting. The meeting was held on December 8, 2021, and the scoping period concluded on December 16, 2021. On May 17, 2022, the University published a Notice of Time Extension in the *Environmental Monitor* for a Post-Scoping Notice to be finalized on or before November 8, 2022. Based upon an environmental assessment of the proposed project, the University has determined preparation of an Environmental Impact Evaluation (EIE) for the proposed action is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

During the public scoping period, comments were received from:

- Jane Montanaro, Executive Director, Preservation Connecticut
- Jonathan Kinney, State Historic Preservation Officer, Connecticut Department of Economic and Community Development State Historic Preservation Office
- Dr. Margaret McCutcheon Faber
- Linda Brunza, Environmental Analyst, Connecticut Department of Energy and Environmental Protection (DEEP)

A summary of comments and responses are attached.

Summary of Scoping Comments & Responses

Preservation Connecticut provided written scoping comments from Jane Montanaro, Executive Director, dated December 14, 2021.		
Comment Number	Comment	Response
PCT SCR# #1	<p>The proposed south campus residence hall should receive thorough and extensive environmental evaluation for its potential impact on historic resources.</p> <p>The site for the proposed residence hall lies within the boundaries of the University of Connecticut Historic District which was listed on the National Register of Historic Places in 1989 for its significance in three areas: education, architecture, and landscape architecture. Under landscape architecture, the designation recognizes campus planning for the university, beginning with a conceptual plan created by Charles N. Lowrie in 1910, and continuing with the construction of the campus over the ensuing decades, which adhered to the spirit and general outlines of Lowrie’s plan if not every detail. Lowrie’s campus plan had two major components. The first was the academic area, to contain classroom buildings, library, dormitories, and other related buildings; it was to be formal, institutional, and monumental in scale. The second was an area of faculty and staff housing, later known as Faculty Row; it was to be informal, domestic, and human-scaled. The site proposed for the residence hall is currently occupied by 4 Gilbert Road, a faculty residence constructed in 1917 for the University of Connecticut and identified as a contributing resource within the district This house, along with its mate at 3 Gilbert Road, are the only extant structures of Faculty Row. The two houses were the subjects of a Memorandum of Understanding (MOU) signed in 2017 by the University, the Connecticut State Historic Preservation Office (SHPO), and the Connecticut Trust for Historic Preservation (now operating as Preservation Connecticut, PCT). Under that agreement, the university committed, among other things, to maintain the two houses in active service at least through the period of the current campus master plan, which runs through the end of 2035, and to renovate them for occupancy no later than 1 January 2022.</p>	<p>In 2015, concurrent with the preparation of a university master plan, UConn retained consultants to produce a Historic Structure Report concerning certain structures known as the “Brown Houses” including 3 and 4 Gilbert Road. That report concluded that reuse or adaptive use of the Brown Houses was neither pragmatic, as such buildings were no longer suitable for the majority of university functions, nor economically feasible. Consequently, UConn proposed demolition of the Brown Houses. Thereafter, discussions between UConn and SHPO culminated in the parties signing a Memorandum of Understanding in June 2016. The Memorandum of Understanding provided that UConn would conduct further studies and “may include some short-term preservation work, but primarily will focus on the appropriate processes for making decisions about existing historic buildings on the UConn campus.” If the terms of the Memorandum of Understanding could not be carried out, both parties were permitted to terminate the agreement.</p> <p>Subsequently, the University, to the extent feasible, stabilized and maintained 3 and 4 Gilbert Road to the best of its ability in an effort to maintain them as contributing resources.</p> <p>In 2017, a second Memorandum of Understanding (MOU) was executed between UConn, SHPO and the Connecticut Trust for Historic Preservation (PCT). UConn agreed to maintain 3 and 4 Gilbert Road, to stabilize the houses to prevent further deterioration, implement a plan for their adaptive reuse and bear the costs of the capital improvements and operational expenses for the houses. The MOU further provided, “[t]he Maintained Houses will remain where they are presently located so long as they do not interfere with any proposed campus development,” and that UConn would provide timely notice if such a development is planned so the parties can reach a mutually agreeable plan for resolution. If an agreement could not be reached, the MOU expressly stated that the parties would “retain all of their rights... to the same extent they would have had in the absence of the [MOU].”</p> <p>In the Fall of 2021, UConn notified SHPO and the PCT that it was evaluating an earlier concept for potential development of a combined residence and dining hall on South Campus (Project).</p>

Preservation Connecticut provided written scoping comments from Jane Montanaro, Executive Director, dated December 14, 2021.		
Comment Number	Comment	Response
		<p>During the more than ten months since providing notice, UConn has met multiple times with both SHPO and the PCT in an effort to develop a mutually agreeable plan for resolution, but a new agreement has not been reached.</p> <p>Despite the absence of a new agreement, UConn has informed SHPO and the PCT that it will not demolish 4 Gilbert Road. Rather, UConn will relocate the historic building to a new site within the boundaries of the University of Connecticut Historic District in close proximity to 3 Gilbert Road. UConn has approved a budget of \$6.6 million to fund the relocation of 4 Gilbert Road and other preservation efforts. UConn will also maintain both houses until at least 2035. Those representations are in accordance with the 2017 MOU.</p>
PCT SCR#2	<p>Environmental review of the proposed residence hall must pay particular attention to the cumulative effect of the University's actions within the historic district.</p> <p>In 2017, nine Faculty Row houses remained along Gilbert Road. All had survived with no significant alterations, and all were identified as contributing resources within the National Register district. The university had proposed demolishing them but in the face of community opposition offered to retain one of the houses. However, SHPO and PCT representatives indicated that at least two buildings were necessary to represent adequately the nature of the campus plan as recognized by the National Register designation. As a result, the University committed to preserve two houses in the MOU. Based on that commitment, SHPO and PCT agreed not to oppose the demolition of the remaining houses. Today, the proposal to build a massive residence hall on the site of 4 Gilbert Road once again creates the potential for significant adverse impact to the National Register historic district, were 4 Gilbert Road to be demolished to make room for the new building. This impact would be greater than the loss of a single historic building. As in 2017, losing one more building would destroy the sense of a campus segment as envisioned by Lowrie and created by the University and the taxpayers of Connecticut. What would be lost would be not a single building, but rather one-half of the historic campus. Environmental review of the proposed residence hall must adequately recognize this potential adverse effect and place the highest possible priority on avoiding adverse effects of construction.</p>	<p>Since providing notice of the University's plan for the Project, UConn has worked to achieve a mutually agreeable plan to minimize the cumulative effect and direct impact to the District. The University values the involvement of both SHPO and the PCT and the historic significance of the Brown Houses to its campus. In furtherance of historic preservation, UConn has expressly agreed that it will <u>not</u> demolish 4 Gilbert Road and will instead <u>relocate the building</u> to a new site within the boundaries of the University of Connecticut Historic District. UConn has committed, and received approval, to expend \$6.6 million to relocate 4 Gilbert Road and undertake other preservation efforts. Thereafter, UConn will maintain both houses until at least 2035. This proposed action complies with the 2017 MOU.</p> <p>Moreover, the Project does not create a significant adverse impact to the district nor involve the destruction of a historic resource. Rather, it preserves the district and complies with the spirit of the MOU, while also balancing the University's need to develop the Storrs campus, preserve taxpayer dollars, and act as a steward to UConn's own history.</p> <p>Environmental review of the Project should consider all relevant surrounding circumstances and factors, including whether there is no feasible and prudent alternative to the plan that UConn has proposed. Additionally, review should consider the reasonable requirements of overall safety and welfare, as well as the economic impact preservation will have in light of the social benefits that will ultimately be derived from an alternate plan.</p>

Preservation Connecticut provided written scoping comments from Jane Montanaro, Executive Director, dated December 14, 2021.		
Comment Number	Comment	Response
PCT SCRH #3	<p>The present condition of 4 Gilbert Road must not be a determinative factor in evaluating options for its preservation.</p> <p>As part of the MOU, UConn committed to renovating the two Faculty Row houses for occupancy and use no later than 1 January 2022. That deadline will not be met. In fact, no renovation work has been started, let alone completed, and the buildings stand vacant, neglected, and unimproved. The university's failure to meet its commitment cannot be considered justification for any option that would entail demolition of the house.</p>	<p>Since entering into the MOU in 2017, the University has stabilized and maintained the houses to the best of its ability and continues to preserve them as contributing resources to the campus community. However, in the intervening period, UConn has faced significant and unpredictable challenges including leadership changes, fiscal constraints, operational challenges, shifting priorities and the unprecedented impacts due to COVID-19, which continue even today. Those extraordinary events have prevented UConn from meeting the January 2022 deadline.</p> <p>In accordance with SHPO's and PCT's desires, UConn does <u>not</u> plan to demolish 4 Gilbert Road, but rather <u>relocate</u> the building to another location within the boundaries of the University of Connecticut Historic District. And UConn will, in accordance with the MOU, continue to maintain both 3 and 4 Gilbert Road until at least 2035.</p> <p>Nevertheless, UConn must also consider costs, any impact on UConn's educational mission, delays to campus development and the ultimate reuse of the properties, when deciding to what extent preservation is prudent. UConn has demonstrated its clear commitment to historic preservation by allocating \$6.6 million to relocate 4 Gilbert Road and undertake other preservation efforts. While UConn agrees that the present condition of 4 Gilbert Road should not be <i>the sole</i> determinative factor, it is certainly a factor in the totality of considerations which cannot be ignored.</p>
PCT SCRH #4	<p>The public needs more opportunity to comment on the potential effects of the project on historic resources.</p> <p>The scoping presentation made by the University and its consultants on 9 December 2021 did not explicitly identify the potential effects of the proposed action on historic resources. Apart from one passing reference to the proposed site of the residence hall's being within the historic district, the presenters did not identify 4 Gilbert Road as an historic resource that might be affected by the construction of the residence hall. Nor was there any indication that historical factors were considered in evaluating the various alternative sites for the hall. This is in contrast to the presenters' identification of endangered wildlife habitat within the construction site, and the assurance that no critical habitat would be affected. Members of the public who viewed the presentation, live or as recorded, would not have complete knowledge of the potential effect of the project on historic resources, and therefore would not be able to comment</p>	<p>See Response to PCT SCRH #1. The University published a Notice of Scoping and held a public meeting in compliance with CEPA regulations. The Notice included a graphic which showed that the footprint of 4 Gilbert Road would be subsumed by the footprint of the Project.</p>

Preservation Connecticut provided written scoping comments from Jane Montanaro, Executive Director, dated December 14, 2021.		
Comment Number	Comment	Response
	adequately for scoping purposes. In order to provide the public with adequate information and to allow for informed commenting, Preservation Connecticut advises the University to revise its posted materials, conduct another scoping presentation, and extend the comment period for project scoping.	

The State of Connecticut Department of Economic and Community Development, State Historic Preservation Office provided written scoping comments from Jonathan Kinney, State Historic Preservation Officer, dated December 15, 2021.		
Comment Number	Comment	Response
SHPO SCR# #1	UCONN agreed to stabilize 3 and 4 Gilbert Road (3.1b). Has UCONN stabilized these buildings? If not, why? What is the current condition of the buildings? Are they in use?	See Response to PCT SCR# #1, 2 and 3. UConn has stabilized and maintained the houses to the best of its ability and continues to preserve them as contributing resources to the campus community. The buildings are not in use as they are not suitable for the majority of university functions, and their conditions are unsafe and uninhabitable.
SHPO SCR# #2	According to the Memorandum 3.1c, UCONN will implement a plan for adaptive re-use of 3 and 4 Gilbert Road by January 1, 2022. Has UCONN prepared a plan for either property? If so, SHPO requests a copy of the plan and progress to date. If not, SHPO requests and explanation for why the plan has either not been prepared or implemented.	See Response to PCT SCR# #1, 2 and 3.
SHPO SCR# #3	UUCONN agreed to bear the costs of capital improvements and operational expenses for 3 and 4 Gilbert Road (3.1d). Since signing of the agreement, has UCONN invested in any improvements to 3 or 4 Gilbert Road? If so, SHPO requests a summary of expenditures.	See Response to SHPO SCR# #1, 2 and 3. UConn has continued limited maintenance of the unoccupied houses and will continue to bear the costs of capital improvements and operational expenses.
SHPO SCR# #4	Has UCONN considered alternate locations for the proposed student housing development? If so, please provide this information to SHPO with an explanation of why the alternate locations are not considered suitable.	Yes. A description of the Alternatives Assessment is provided in the Environmental Review Checklist.
SHPO SCR# #5	Can 4 Gilbert Road be incorporated into the currently proposed housing development?	No. The University has determined it is not feasible to incorporate 4 Gilbert Road into the design and construction of the Project.

Dr. Margaret McCutcheon Faber provided written scoping comments, dated December 16, 2021.		
Comment Number	Comment	Response
Faber SCRH #1	As part of a legal agreement (UConn Brown Houses Term Sheet and Memorandum of Understanding) with the State Historic Preservation Office, UConn agreed that 3 and 4 Gilbert Road would be retained, rehabilitated, and adaptively re-used. As a pair these structures, with their view to Mirror Lake, form a gateway to the South Campus that reminds visitors of the University's origins. Sadly, UConn did not uphold its end of the agreement. Neither house has been restored or adaptively re-used. In fact, both have been allowed to deteriorate into an unfortunate state of disrepair, which gives the appearance of a deliberate strategy of "demolition by neglect."	UConn does not agree with the characterization that UConn "did not uphold its end of the agreement." The 2017 MOU speaks for itself and incorporates other provisions which limit, and/or condition, UConn's obligation to retain, rehabilitate and adaptively re-use 3 and 4 Gilbert Road. See Response to PCT SCRH #1, 2 and 3. Moreover, the University has since undertaken extensive efforts with SHPO and PCT to identify and implement mitigation measures and is allocating \$6.6 million for that purpose.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated December 16, 2021.		
Comment Number	Comment	Response
CTDEEP SCRH #1	The Connecticut Environmental Policy Act project meeting was held on December 8, 2021. While there was a discussion of the other locations that were considered for the residence hall, there was not a discussion of the "No Action" alternative. For watershed purposes, UConn should include the "no action" alternative in the Environmental Impact Evaluation.	A No Action Alternative is included in the Environmental Review Checklist.
CTDEEP SCRH #2	There is a potential increase in connected impervious surface area of this proposed action to the urbanized core campus draining through Mirror Lake and to Roberts Brook. The direct, indirect, and cumulative impacts of increased impervious surface area and resulting stormwater runoff volume and quality impacts to downstream aquatic and watershed resources should be further detailed, especially considering the 2020 Connecticut Integrated Water Quality Assessment reporting of Roberts Brook as Not Supporting for Habitat, Other Aquatic Life and Wildlife use designation. Please contact Eric Thomas in the Water Planning and Management Division with any questions at Eric.Thomas@ct.gov.	In 2018, UConn recently updated its Campus Drainage Master Plan (CDMP) to guide development of the UConn campus from a stormwater perspective, including an updated hydrologic analysis of the Mirror Lake drainage area within the Roberts Brook watershed. One overall goal of the CDMP was to identify ways to reduce stormwater flows to below 1993 levels. Comprehensive modeling of the Roberts Brook watershed was performed with 1993 as the baseline year and assessed with past and planned development, including the proposed South Campus Residence Hall and Dining Facility. Specific to Mirror Lake, the CDMP recommended studying solutions for increasing the freeboard in Mirror Lake and mitigating downstream impacts from outflows. In 2020, UConn and CTDEEP signed a Memorandum of Understanding (MOU) regarding UConn's plans to undertake, improve and construct flood mitigation and water quality enhancements in the Roberts Brook and Eagleville Brook) watersheds.
CTDEEP SCRH #3	Please contact the Land and Water Division for information regarding Flood Management Certification, which would be	Comment noted.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated December 16, 2021.		
Comment Number	Comment	Response
	required for this location. Information on the certification process can be found on DEEP’s website at Flood Management Certification, An Environmental Permitting Fact Sheet. For any questions or clarification please contact Colin Clark at Colin.Clark@ct.gov.	
CTDEEP SCRH #4	Natural Diversity Database (NDDDB) maps represent the approximate locations of species listed by the State, pursuant to section 26-306 of the Connecticut General Statutes (CGS), as endangered, threatened or of special concern. The maps are a pre-screening tool to identify potential impacts to state listed species. The database shows that the project falls within one of the NDDDB areas. The applicant is required to submit a Request for Natural Diversity Data Base (NDDDB) State Listed Species Review Form (DEEP-APP-007) and all required attachments, including maps, to the NDDDB for further review. Additional information concerning NDDDB reviews, and the request form, may be found on-line at: NDDDB Requests.	The NDDDB review process has been completed. Correspondence from CT DEEP in January 2022 indicated that no negative impacts to State-listed species are anticipated.
CTDEEP SCRH #5	<p>If there is any hydrostatic pressure testing of water lines or natural gas lines, the discharge can be directed to a sanitary sewer line. This discharge would be authorized without the need for registration by the General Permit for Discharges from Miscellaneous Industrial Users (MIU GP) as long as:</p> <ul style="list-style-type: none"> the maximum daily flow of the hydrostatic pressure testing wastewater is less than 5000 gallons per day the workers doing the hydrostatic pressure testing follow the Best Management Practices spelled out at Appendix H(5) of the MIU GP (page 66 of 72). <p>Any other wastewater discharges from the site (cleaning wastewaters or other process wastewaters that are entraining pollutants simply by contact with a pollutant) can also be discharged under the MIU GP to a sanitary sewer without registration as long as their max daily flow is less than 1000 gpd and they meet effluent limits of Table 5-1 (page 16 of 72) of the MIU GP. Please contact James Creighton in Water Permitting and Enforcement at James.Creighton@ct.gov with any questions.</p>	Comment noted for civil engineering assessment and design.
CTDEEP SCRH #6	The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the	Comment noted for civil engineering assessment and design.

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated December 16, 2021.		
Comment Number	Comment	Response
	<p>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 postconstruction 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</p>	

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated December 16, 2021.		
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	<p>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.</p>	
CTDEEP SCR# 7	<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. 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</p>	<p>Comment noted. Regarding idling, the project specifications will require adherence to RCSA.</p>

The State of Connecticut Department of Energy and Environmental Protection provided written scoping comments from Linda Brunza, Environmental Analyst, dated December 16, 2021.		
Comment Number	Comment	Response
	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.	

August 26, 2022

Ms. Laura Cruickshank
University of Connecticut
Planning, Architectural & Engineering Services
31 LeDoyt Road, Unit 3038
Storrs, CT 06269-3038
(sent only via email to laura.cruickshank@uconn.edu)

Subject: South Campus Residence Hall Response
4 Gilbert Road
Mansfield (Storrs), CT

Dear Ms. Cruickshank:

I am writing to follow up on my letter of June 10, 2022 and to continue consultation for the above-referenced proposed undertaking, pursuant to the Connecticut Environmental Policy Act. The proposed project is located within the boundaries of the University of Connecticut Historic District (Connecticut Agricultural School), a property listed on the National Register of Historic Places.

It is the understanding of the State Historic Preservation Office (SHPO) that the University of Connecticut (UCONN) plans to construct a new seven-story, mid-rise residence hall consisting of approximately 650 suite-style beds and a contiguous 500-seat dining hall. The new residence hall will be located just south of the intersection of Gilbert Road and Mansfield Road and directly over the footprint of the existing building at 4 Gilbert Road. The two-story residence at 4 Gilbert Road, sometimes referred to as one of the “Brown Houses”, is one of two buildings remaining from the cluster of early twentieth century houses known as Faculty Row. Both the house at 4 Gilbert Road and the house located directly across from it at 3 Gilbert Road are listed as contributing resources within the historic district.

During 2015, UCONN, SHPO, and Preservation Connecticut were involved in extensive consultation regarding the then proposed Student Recreation Center. After more than a year of consultation, exploration of alternatives, and significant community comment; our offices reached an agreement defined under the *UConn Brown Houses Term Sheet* (Term Sheet) dated December 9, 2016 and a *Memorandum of Understanding and Agreement* (Memorandum) executed April 21, 2017. As part of that agreement, although seven of the nine Brown Houses would be demolished, the houses at 3 and 4 Gilbert Road would be rehabilitated and put back into use. These two houses were agreed upon because they maintained an important relationship to each other and their setting. Together, these buildings preserved and expressed the historic character of the buildings that were lost. Specifically, the two remaining buildings are situated across the street from each other, are sited with large setbacks, are of similar architectural style, and together frame a view towards Mirror Lake, all character defining features of Faculty Row. As a result, a visitor can stand between these buildings and understand the historic landscape and

its intended design of a human scale institution. It was for this reason that SHPO accepted retention of these two specific buildings as adequate mitigation per the 2017 Term Sheet and Memorandum.

The proposed undertaking will result in the removal of the house at 4 Gilbert Road from its original location and the introduction of the seven-story South Campus Residence Hall within the boundaries of the historic district, both resulting in a further diminishment of the district's overall integrity. Therefore, it is the SHPO's determination that the proposed undertaking will have an *adverse effect* upon historic resources.

While the project will result in an adverse effect, the SHPO greatly appreciates your efforts and the efforts of your team, to work closely with SHPO and Preservation Connecticut and to develop measures to minimize and mitigate those effects to the historic district. As originally proposed, the building at 4 Gilbert Road was to be demolished as part of this project to make way for the new residence hall. However, UCONN has since proposed to relocate the historic building approximately 200 feet away to a location on the opposite side of Gilbert Road and adjacent to 3 Gilbert Road. This new location is also within the boundaries of the University of Connecticut Historic District (Connecticut Agricultural School). Once it is relocated, the interior and exterior of the building will be rehabilitated and restored to its original residential use for house visiting faculty, graduate students, or possibly, for residential directors of the housing program. UCONN also has agreed to complete an exterior stabilization and rehabilitation of the house at 3 Gilbert Road. It is the University's intent to identify a use or tenant for that building and to then move forward with an interior rehabilitation appropriate to that specific use.

The SHPO, Preservation Connecticut, and UCONN are currently working on finalizing the details of a mutually agreeable scope of work for the relocation and rehabilitation of 4 Gilbert Road and the exterior rehabilitation of 3 Gilbert Road. It is the SHPO's opinion that these mitigative measures are commensurate with the effects of the undertaking and we look forward to continuing consultation with UCONN and Preservation Connecticut to develop and finalize an agreement document that memorializes these measures.

Thank you. Please do not hesitate to contact me at (860) 500-2380 or jonathan.kinney@ct.gov if you have any questions or need further information.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Kinney". The signature is fluid and cursive, with a long, sweeping underline.

Jonathan Kinney
State Historic Preservation Officer

Cc: Jane Montanaro, Preservation Connecticut (via email)