



State of Connecticut

Environmental Review Checklist

Last Updated 02/25/2020

Instructions for Use:

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

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

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

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

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

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

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



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PART I – Initial Review and Determination

Date: 03/08/2024
Name of Project/Action: West Hartford Fellowship Housing Phase I
Project Address(es): 10-30 Starkel Road, West Hartford, CT 06117
Affected Municipalities: West Hartford
Sponsoring Agency(ies): DOH
Agency Project Number, if applicable: FX/HM2315401
Project Funding Source(s)/Program(s), if known: FLEX - \$4,000,000, HOME Investment Partnerships Program - \$2,500,000

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 State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of Section 106 of the National Historic Preservation Act of 1966 and Connecticut Environmental Policy Act. It was determined that the subject property does not appear to be eligible for listing on the National Register of Historic Places. Based on the information provided to this office, no historic properties will be affected.

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

Completed by: Mithila Chakraborty, Ph.D., Environmental Analyst 1

Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan

of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.

PART II – Detailed Project Information

Description of the Purpose & Need of the Proposed Action:

Project plans demolition and re-development for 4 phases and consist of the demolition of 22 of the existing apartment building and construction of six apartment buildings with 300 apartment units and a garage/maintenance building.

Description of the Proposed Action:

Phase I includes the demolition of three of the existing one-story buildings consisting of twenty-two apartment units. The re-development and construction consist of two 3-story apartment buildings. Building 1 will consist of 3 studio and 22 one-bedroom apartment units. Building 2 will consist of 4 studios, 30 1-BR, and 6 2-BR units. Phase II consists of the demolition of 6 buildings and the construction of two 3-story buildings. Phase III will consist of the demolition of 8 buildings and construction of one 4-story building Phase IV will consist of the demolition of 4 buildings and construction of one 3-story building and a garage/maintenance building.

Alternatives Considered:

No Action Alternative.

Public concerns or controversy associated with the proposed action:

None.

PART III – Site Characteristics (Check all that apply)

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

Locational Guide Map Criteria:

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

Priority Funding Area factors:

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

Conservation Area factors:

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

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

Required Factors for Consideration (Section 22a-1a-3 of the RCSA)	Agency’s Assessment and Explanation
Effect on water quality, including surface water and groundwater;	<p>The proposed action will not result in any impact to groundwater and surface water quality.</p> <p>The general permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of 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.</p> <p>The Phase 1 area, which is the only phase under construction at this time, is less than 5 acres and was locally approved by the Town of West Hartford. Therefore, in accordance with section 3(d) "Small construction" of the 2020 General Permit states that registration with the state under the General Permit is not required. The contractor is responsible for following all stipulations identified on the Erosion and Sedimentation Control Plan as approved by the Town of West Hartford.</p>
Effect on a public water supply system;	<p>The project will not have any impact on public water supply system.</p> <p>DEEP commented this redevelopment is located upstream of Trout Brook, an impaired waterbody with a pollutant reduction analysis for bacteria (Total Maximum Daily Load https://portal.ct.gov/-/media/DEEP/water/tmdl/CTFinalTMDL/troutbrook4403). A roadway (King Philip Drive) separates the proposed development from a freshwater forest and shrub wetland and a tributary to Trout Brook. To minimize the water quality impacts of the redevelopment, management measures for stormwater and sediment to the west of the roadway should be taken as to not further impact downstream surface waters, including Trout Brook.</p> <p>The Phase 1 area is located on the western side of the site with approximately 500 feet of undisturbed site between the limit of work and King Phillip Drive. The stormwater from the site is collected and discharged to an underground detention system that reduces the peak discharge from the site toward King Phillip Drive. Water quality from the site is also improved by Hydrodynamic Separators designed to remove greater than 80% Total Suspended Solids and their associated pollutants from the discharge stream.</p>

	<p>During construction, an Erosion and Sedimentation Control plan approved by the Town of West Hartford shall be implemented onsite to minimize the collection and transport of sediment from disturbed areas into the storm system and offsite.</p>
<p>Effect on flooding, in-stream flows, erosion or sedimentation;</p>	<p>The project site is not located in 100- or 500-year flood zone.</p> <p>DEEP Staff reviewed this location and found that it was not in a Natural Diversity Database Area as well as not in an aquifer protection area and has no comments on the proposed project.</p>
<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 setting; OR B. Disruption of an archeological or sacred site;</p>	<p>The State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of Section 106 of the National Historic Preservation Act of 1966 and Connecticut Environmental Policy Act. It was determined that the subject property does not appear to be eligible for listing on the National Register of Historic Places. Based on the information provided to this office, no historic properties will be affected.</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>The project is not located in any Natural Diversity Database area.</p> <p>According to DEEP too it was not in a Natural Diversity Database Area. So, this project will not have any effect on natural communities of critical habitat. There is no floodzone so the project will not affect any fish or aquatic animal.</p> <p>DEEP Staff notes that there are minimal aquatic resources at this location, but the site is situated within the Trout Brook East watershed. Trout Brook has been impaired by the large amount of impervious surfaces, land use practices, flood control practices, and impassible stream crossings, which is approximately a mile downstream of this project. Proper stormwater management and best management practices are needed, including incorporation of green infrastructure if feasible, and considering features such as rooftop or rain gardens would benefit the area. In keeping with DEEP's 2015 recommendation to reduce impervious cover in this area, designing to reduce impervious square footage from existing conditions is recommended.</p> <p>Proper stormwater management and best management practices will be incorporated. The Phase 1 area, which is the only phase under construction at this time, is less than 5 acres and was locally approved by the Town of West Hartford. Therefore, in accordance with section 3(d) "Small construction" of the 2020 General Permit states that registration with the state under the General Permit is not required. The contractor is responsible for following all stipulations identified on the Erosion and Sedimentation Control Plan as approved by the Town of West Hartford.</p>

Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;	Based on the type and the nature of the development, the use of pesticides, toxic or hazardous materials are not anticipated.
Substantial aesthetic or visual effects;	The project is not expected to cause substantial aesthetic or visual impacts in the area.
Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans;	Proposed project is consistent with the State C&D Plan Growth Management principles #1 (Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure); Growth Management Principle #2 (Expand Housing Opportunities and Design Choices to Accommodate a variety of Household Types and Needs); and Growth Management Principle #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options).
Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis;	Temporary disruption is expected during work being done, but the long-term affect will be positive to the site and neighborhood.
Displacement or addition of substantial numbers of people;	No direct, indirect or cumulative impacts.
Substantial increase in congestion (traffic, recreational, other);	During work there can be some temporary traffic but best management practice can be adopted to reduce the impact.
A substantial increase in the type or rate of energy use as a direct or indirect result of the action;	Some increase may occur as the building will be residential.
The creation of a hazard to human health or safety;	No impact anticipated.
Effect on air quality;	<p>During construction there can be a little air dust issue, but no direct, indirect or cumulative impacts are anticipated from reuse work.</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</p>

	<p>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>DOH advised client to adopt best management practices including those from DEEP to reduce potential air quality impacts. "NO IDLING" signs will be posted throughout the jobsite.</p>
Effect on ambient noise levels;	No noise issue is anticipated.
Effect on existing land resources and landscapes, including coastal and inland wetlands;	Not any adverse impact on coastal or inland wetland are anticipated.
Effect on agricultural resources;	Not any adverse impact on agricultural land is anticipated.
Adequacy of existing or proposed utilities and infrastructure;	Existing utilities are present on site and in the area.
Effect on greenhouse gas emissions as a direct or indirect result of the action;	Not any adverse impact is anticipated.
Effect of a changing climate on the action, including any resiliency measures incorporated into the action;	Not any adverse impact is anticipated.
Any other substantial effects on natural, cultural, recreational, or scenic resources.	Not any adverse impact is anticipated.
Cumulative effects.	Positive cumulative impact increasing housing opportunity for people.

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

DEEP has made recommendations in their review letter dated July 27, 2023 (attached). On request of DOH, Developer/Consultant confirmed that all comments were considered.

(1) Fisheries Division: Proper Stormwater management will be ensured to reduce impact on Trout Brook East watershed. The Phase 1 area, which is the only phase under construction at this time, is less than 5 acres and was locally approved by the Town of West Hartford. Therefore, in accordance with section 3(d) "Small construction" of the 2020 General Permit states that registration with the state under the General Permit is not required. The contractor is responsible for following all stipulations identified on the Erosion and Sedimentation Control Plan as approved by the Town of West Hartford.

Stormwater Management during Construction: The Phase 1 area, which is the only phase under construction at this time, is less than 5 acres and was locally approved by the Town of West Hartford. Therefore, in accordance with section 3(d) "Small construction" of the 2020 General Permit states that registration with the state under the General Permit is not required. The contractor is responsible for following all stipulations identified on the Erosion and Sedimentation Control Plan as approved by the Town of West Hartford.

(2) Solid Waste Disposal: The nonhazardous demolition waste (approximately 124 tons) was transported to Murphy Road Recycling, LLC located in Hartford, Connecticut for recycling. Proof attachments were sent to DOH.

(3) Special Waste:

Asbestos Waste: All identified asbestos containing materials were properly abated prior to the demolition of the building. A copy of the Asbestos Abatement Monitoring Report for Buildings 30, 32, 34 & Community Center prepared by GeoQuest, dated December 28, 2023, was sent to DOH as attachment. The asbestos abatement waste was properly transported for disposal at the Minerva Landfill located in Waynesburg, Ohio, an EPA approved solid waste landfill for asbestos waste.

Lead-Based Paint: Pre-demolition lead-based paint inspections were conducted of buildings 30, 32, and 34 by Atlas Technical Consultants in December 2021 and of the Community Center by GeoQuest in May 2023 using an X-Ray Fluorescence (XRF) Analyzer. The EPA and CTDPH define lead-based paint as paint or other coatings containing a lead concentration of 1.0 milligrams per square centimeter (mg/cm²) or greater as measured by XRF analysis. The lead-based paint inspection results indicate that lead-based paint is not present on any of the materials tested.

Polychlorinated Biphenyls in Building Materials: GeoQuest conducted testing for polychlorinated biphenyls (PCBs) in suspect building materials of buildings 30, 32, 34, and the Community Center in November 2022 and June 2023. No PCBs above regulatory limits were identified in the building materials tested.

Universal Waste: As part of the pre-demolition inspections conducted by GeoQuest for buildings 30, 32, 34, and the Community Center miscellaneous hazardous materials were identified. Based on conversations with Mark Garilli, Chief Executive Officer of WHFH, these materials have been kept for reuse in existing units requiring maintenance and replacement as needed.

(4) Watersheds Management: The Phase 1 area is located on the western side of the site with approximately 500 feet of undisturbed site between the limit of work and King Phillip Drive. The stormwater from the site is collected and discharged to an underground detention system that reduces the peak discharge from the site toward King Phillip Drive. Water quality from the site is also improved by Hydrodynamic Separators designed to remove greater than 80% Total Suspended Solids and their associated pollutants from the discharge stream . During construction, an Erosion and Sedimentation Control plan approved by the Town of West Hartford shall be implemented onsite to minimize the collection and transport of sediment from disturbed areas into the storm system and offsite.

(5) Air Management: DOH suggested DEEP recommendations to be maintained. "NO IDLING" signs will be posted throughout the jobsite.

PART VI – Sponsoring Agency Comments and Recommendations

Based on the environmental assessment of the proposed project, DOH recommends that the project proceed as proposed and preparation of an Environmental Impact Evaluation (EIE) is not warranted.

PART VII - Public Comments and Sponsoring Agency Responses:

No public comments provided during scoping notice period.