STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL ASSESSMENT CHECKLIST

Date: April 8, 2014
Project Name: Meriden Transit Oriented Development
Municipality: Meriden
Staff Contact: Mark Alexander

This assessment is being conducted in conformance with the Connecticut Department of Transportation's (CTDOT) Environmental Classification Document (ECD) to determine Connecticut Environmental Policy Act (CEPA) obligations.

Project Description:
The City of Meriden, the Meriden Housing Authority, and its selected developer have asked for the Connecticut Department of Transportation's (Department) participation in a transit-oriented development (TOD), in conjunction with the reconstruction of the Meriden train station as part of New Haven-Hartford-Springfield (NHHS) rail project. The proposed TOD project will include construction of a four-story mixed-use building with 63 residential units, retail space on the first floor, and a shared-use parking garage of approximately 275 spaces. The Department's participation in the project is limited to the construction cost for the garage and the provision of one of three (3) lots to be used for the mixed-use building and garage structures. The garage structures will serve rail commuters and tenants of the new building. At least 200-250 spaces will be reserved for the Department to accommodate rail commuters and non-resident TOD. The developer will construct the garage which will be owned by the Meriden Housing Authority upon completion and the Department will retain air rights to the upper levels of the garage ("Air Rights Garage") and access for maintenance. The parking structure will be funded primarily by the Department, but the developer will pay the cost of spaces that will be reserved for the tenants of the residential portion of the mixed-use building.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of Environmental Significance (Direct/Indirect)

1. *Impact on air and water quality or on ambient noise levels*
    a) *Air Quality* – No negative impacts are anticipated. The project is located within the boundaries of the portion of the State which has been classified as non-attainment for PM 2.5 and/or attainment maintenance for PM 10. This TOD project would present enhanced opportunities for mass transit usage, such that benefits to air quality can be anticipated. By promoting the use of mass transit, single occupancy vehicles will be removed from the roadway network in the project area, thus resulting in lower vehicle

miles of travel with associated reductions in pollutants generated from vehicular emissions.

b) *Water Quality*- No negative impacts are anticipated. The Department has taken all comments regarding water quality into account and will employ best management practices (BMP's), including the use of low impact development (LID), where applicable, as the project moves forward.

c) *Ambient Noise Levels*- No negative impacts are anticipated.

2. *Impact on a public water supply system or serious effects on groundwater, flooding, erosion, or sedimentation*
   a) *Water Supply* – No negative impacts are anticipated. The project area is not within a public water supply source water area, as noted in the comment letter received from the Department of Public Health (DPH).

   b) *Groundwater* - No negative impacts are anticipated; see 1.b above.

   c) *Flooding* – No negative impacts are anticipated. The project is not located within the 100 year flood zone.

   d) Erosion or Sedimentation- No negative impacts are anticipated. Stormwater discharges from construction sites where one or more acres are to be disturbed require a permit. The CTDEEP Permitting & Enforcement Division has issued a General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (DEP-PERD-GP-015) that will cover these discharges. This permit now requires that post-construction control measures incorporate runoff reduction practices, such as low impact development (LID) techniques, to meet performance standards specified in the permit. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the CTDEEP prior to the initiation of construction. This project will disturb <u>less</u> than 5 acres. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and adheres to the Connecticut Guidelines for Soil Erosion and Sediment Control. If no review is conducted by the town or written approval is not provided, the permittee must register with CTDEEP. The developer is required to obtain all permits for this project

3. *Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows* – No negative impacts are anticipated. There are no wetland impacts associated with this project.

4. *Disruption or alteration of an historic, archaeological, cultural, or recreational building, object, district, site or its surroundings* – The CT State Historic Preservation Office (CTSHPO) initially reviewed the project for the demolition of the structure at 24-36 Colony Street only; and in signed concurrence dated November 6, 2013, determined that no historic properties would be affected by the demolition of this building. A subsequent review has taken place for the project as a whole and CTSHPO has determined, in a letter dated February 11, 2014 that mitigation needs to take place in order to avoid an adverse effect to the historic district. CTSHPO proposes two suggestions for mitigation:

    - An interpretive panel of the historic district adjacent to the new structure be installed between the new structure and 62 Colony Street (The First Congregational Church), and
    - Signage bounding the district.

    These stipulations will be met in order to avoid an adverse effect.

5. *Effect on natural communities and upon critical species of animal or plant and their habitats; interference with the movement of any resident or migratory fish or wildlife species* – No negative impacts are anticipated. The Natural Diversity Data Base (NDDB) contains no records of any extant populations of federally listed endangered species or species listed by the State, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern in the project area.

6. *Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact* - No negative impacts are anticipated.

7. *Substantial aesthetic or visual effects* - CTSHPO noted that the new modern structure seems to be out of scale with the historic district. However, CTSHPO proposed two measures to mitigate this and avoid an adverse effect. These stipulations will be met in order to mitigate any adverse effect.

8. *Consistency with the written and/or mapped policies of the Statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency* – Since this action involves the acquisition and development or improvement of real property whose costs are in excess of $200,00, it is subject to the consistency requirement of the State of Connecticut Conservation and Development Plan of 2013-2018 (Plan) and its Growth Management Principles (GMP). In particular, this type of project supports both GMP #1 (Redevelopment and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure) and GMP #3 (Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability

of Transportation Options). In addition, the site is located in a Priority Funding Area as defined by the Locational Guide Map of the Plan**.** Therefore, the project is consistent with the written and mapped policies of the Plan.

9. *Disruption or division of an established community or inconsistency with adopted municipal and regional plans* - No negative impacts are anticipated.

10. *Displacement or addition of substantial numbers of people* - No negative impacts are anticipated.

11. *Substantial increase in congestion (traffic, recreational, other)* - No negative impacts are anticipated. The nature of this type of project is such that a decrease in traffic congestion along area roadways can be anticipated. By promoting the use of mass transit, single occupancy vehicles will be removed from the roadway network in the project area, thus resulting in lower vehicle miles of travel, along with associated reductions in traffic congestion.

12. *A substantial increase in the type or rate of energy use as a direct or indirect result of this action* - No negative impacts are anticipated. As previously stated, by promoting the use of mass transit, the rate of single occupancy vehicles usage would decline. It can be anticipated therefor that the rate of energy would also decrease as a result of adding public transportation options in the region.

13. *The creation of a hazard to human health or safety* - No negative impacts are anticipated. Any required testing for hazardous materials will be performed and remediated as necessary. Soil and ground water will be tested once the existing building is demolished. If the testing indicates site contamination, proper remediation, including development of a cleanup plan will be undertaken and measures will be implemented that will clean up the site in accordance with applicable criteria in the Connecticut Remediation Standard Regulations adopted pursuant to section 22a-133k of the CGS.

14. *Any other substantial impact on natural, cultural, recreational or scenic resources* - No additional negative impacts are anticipated.

Conclusion:

After examining any potential environmental impacts and reviewing all comments received from the various resource agencies as well as the public, CTDOT has concluded that the preparation of an Environmental Impact Evaluation will not be required for the Meriden Transit Oriented Development proposal.

Recommendations received by various State agencies as a result of the Scoping Process:

As a result of the Scoping Process, the following recommendations were received from CTSHPO:

The proposed building is within the boundaries of the Colony Street/West Main Street National Register of Historic Places District. CTSHPO is concerned that the new construction will diminish the integrity of the district due to its massing. While in the early 20th century there appeared to be a smaller 4-story structure on this lot, the current proposed building is modern and appears to be out of scale. To avoid an adverse effect, CTSHPO proposes two suggestions for mitigation:

- An interpretive panel of the historic district adjacent to the new structure be installed between the new structure and 62 Colony Street (The First Congregational Church), and
- Signage bounding the district

As a result of the Scoping Process, the following recommendations were received from CTDEEP:

The CTDEEP strongly supports the use of low impact development (LID) practices such as water quality swales and rain gardens for infiltration of stormwater on site. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped together. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs and parking lots),
- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- the use of vegetated roofs (green roofs) to reduce the runoff from buildings,
- proper treatment of special activity areas (e.g. loading docks, covered maintenance and service areas),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and
- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

The effectiveness of various LID techniques that rely on infiltration depends on the soil types present at the site. Infiltration practices may be suitable at this site. According to the Natural Resources Conservation Service's Soil Web Survey, the soils throughout the project area consist of urban land. These soils are unrated in their suitability for various stormwater management practices. However, infiltration practices may be suitable at this site. Test pits should be dug in areas planned for infiltration practices to verify soil suitability and/or limitations. Planning should insure that areas to be used for infiltration are not compacted during the construction process by vehicles or machinery. The siting of areas for infiltration must also consider any existing soil or groundwater contamination.

The following standard recommendation concerning stormwater management for parking garages should be observed:

Stormwater management for parking garages typically should involve two separate collection systems designed to treat the runoff from different types of parking areas. Any exposed parking levels will produce a high volume runoff with relatively low concentration of pollutants. Runoff from such areas should be directed to the storm sewer system and the collection system should include controls to remove sediment and oil or grease. A hydrodynamic separator, incorporating swirl technology, circular screening technology or engineered cylindrical sedimentation technology, is recommended to remove medium to coarse grained sediments and oil or grease. The treatment system should be sized such that it can treat stormwater runoff adequately. The CTDEEP recommends that the treatment system be designed to treat the first inch of stormwater runoff. Upon installation, a maintenance plan to remove sediment and oil or grease should also be implemented.

Interior levels of the garage will produce a low volume of runoff with relatively high concentrations of pollutants. In addition, the need for cleaning of the garage must be considered and floor washwater cannot be directed to a stormwater sewer system. Runoff from interior areas should be directed to the sanitary sewer system, again with appropriate treatment. An oil separator tank with a capacity of at least 1000 gallons is required. A licensed waste oil hauler must clean the tank at least once a year. The discharge of floor washwater is covered under a *General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater* as building maintenance wastewater. Registration is required for discharges greater than 5000 gallons per day.

Because the site is in an historically urbanized area, it is suggested that an environmental or engineering consultant be retained to conduct a site investigation and sampling/testing as appropriate in order to confirm that a property proposed for redevelopment has not been the site of improper disposal of waste or does not contain some other environmental liabilities. The investigation should include an inquiry into the historic uses and fuel storage on the property to assess the likelihood of encountering solid or hazardous waste or soil contamination. In order to ascertain the environmental status of properties, it is typically recommended that a Phase I environmental site assessment (ESA) be performed at the site. If the Phase I ESA indicates site contamination is likely, a Phase II ESA should be performed to confirm or deny the presence of contamination. In order to achieve proper remediation, the extent of contamination should be clearly defined through a Phase III ESA, a cleanup plan developed,

and measures implemented that will clean up the site in accordance with applicable criteria in the Connecticut Remediation Standard Regulations adopted pursuant to section 22a-133k of the CGS.

In keeping with CTDEEP's interest in furthering the use of alternate fuels for transportation purposes, we recommend that Level 1 electric vehicle charging stations (for lengths of stays of 8 hours or greater) be included at 3% of the parking spaces in the project design. Increasing the availability of public charging stations will facilitate the introduction of the electric vehicle technology into the state and serve to alleviate the present energy dependence on petroleum.

For large construction projects, CTDEEP typically encourages the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that 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.

The CTDEEP also encourages 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 the CTDEEP.

The following standard comments regarding building demolition projects should be observed, as applicable, during future planning and implementation of the project. Fact sheets providing additional information concerning environmental, health and safety requirements applicable to building renovation and demolition projects have been developed by the Waste Engineering & Enforcement Division.

- Prior to the demolition of any commercial, industrial or public buildings or buildings containing five or more residential units, they must be inspected for asbestos-containing materials and any such materials must be removed. Written notice must be submitted to the Department of

Public Health 10 working days prior to demolition in accordance with Section 19a-332a-3 of the Regulations of Connecticut State Agencies, for buildings involving more than 10 linear feet or more than 25 square feet of asbestos-containing material.

- The disposal of material containing asbestos requires the approval of the Waste Engineering and Enforcement Division pursuant to section 22a-209-8(i) of the Regulations of Connecticut State Agencies. Proper disposal technique requires that the material be bagged and labeled and placed in an approved secure landfill.

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

- Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. The State Solid Waste Management Plan outlines a goal of 58% recovery rate for municipal solid waste by the year 2024. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. It is recommended that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling.

- Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, that is not hazardous waste, is considered to be special waste. The disposal of special wastes, as defined in section 22a-209-1 of the RCSA, requires written authorization from the Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. In addition, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface.

- The Waste Engineering & Enforcement Division has issued a *General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer)*. It establishes a uniform set of environmentally protective management measures for stockpiling soils when they are generated during construction or utility installation projects where contaminated soils are typically managed (held temporarily during characterization procedures to determine a final disposition). Temporary storage of less than 1000 cubic yards of contaminated soils (which are not hazardous waste) at the excavation site does not require registration, provided that activities are conducted in accordance with the applicable conditions of the general permit. Registration is required for on-site storage of more than 1000 cubic yards for more than 45 days or transfer of more than 10 cubic yards off-site.

The Department of Public Health had no recommendations.