Environmental Assessment Review
University of Connecticut
Student Recreation Center

Storrs, Connecticut
April 2016

UCONN

Prepared for:
University of Connecticut
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Storrs, Connecticut 06269

MMI #1958-103

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1.0 ENVIRONMENTAL ASSESSMENT

1.1 Introduction

This Environmental Assessment Review (EAR) is intended to provide baseline information to assist in determining what effects, if any, the proposed Student Recreation Center (SRC) at UConn's main campus in Storrs (i.e., the project/action) may have on the environment. The assessment has been conducted to determine obligations under the Connecticut Environmental Policy Act (CEPA).

1.2 Proposed Action/Activity Description

UConn proposes to construct a new 200,000-square-foot student recreation center at the current location of the Connecticut Commons student housing on Hillside and Whitney Roads within the main UConn campus in Storrs. The SRC will house various activity zones and will include a gymnasium, indoor pool, specialized activity spaces, locker rooms, service/storage areas, and a free zone that will likely include a lounge, refreshment bar, retail kiosk, and similar support services. UConn's 2015 Campus Master Plan identified a need for special use facilities to support current and projected needs at the University. The proposed action, construction of the SRC, will provide special use facilities toward meeting that need. Demolition of the existing student housing at Connecticut Commons, planned in summer 2016, will be required prior to implementation of the proposed action. New construction associated with this project will incorporate best practices of sustainability with a minimum goal of Leadership in Energy and Environmental Design (LEED) Gold certification.

1.3 Project Purpose and Need

Student recreation facilities are important to the UConn campus, providing a vital component of campus life aimed at centralizing student activities. Student recreation facilities assist in both recruitment and retention and provide productive on-campus activities. Existing indoor recreation facilities at UConn's main campus are not adequate to support current student populations. A new SRC will improve the quality of life on campus for students, faculty, and staff. Anticipated project outcomes include:

- Expanded recreational facilities and student services
- Promotion of comprehensive health and wellness
- Prominent location of recreational facilities at the campus core
- Increased student activity and visibility
- Integration of the SRC into the Hillside Road District within the student hub proposed in the 2015 Campus Master Plan

Construction of the new SRC at the Connecticut Commons site is compatible with the long-range vision for the Hillside Road District.

1.4 Site Information

The Connecticut Commons site is currently developed with student housing. The brick buildings were constructed in the 1970s and are aging. The existing Connecticut Commons contains single rooms primarily for honors undergraduate students. Three buildings house 16 halls. This ±45-year-old complex is approaching the end of its useful life. The Connecticut Commons site is located within the campus core, proximal to the Student Union, the UConn Co-op, Gampel Pavilion, the Homer Babbidge Library, and numerous academic and dormitory buildings. The topography of the site is flat and currently has universal pedestrian access. The site is supported by all required utilities, including water and sewer service, and is located along UConn's shuttle bus route.

1.5 State Conservation and Development Policies Plan

The proposed SRC is located within a Priority Funding Area as designated in Connecticut's State Conservation and Development (C&D) Policies Plan. Priority Funding Areas are classified by Census blocks that include:

- Designation as an Urban Area or Urban Cluster in the 2010 Census
- Boundaries that intersect a ½-mile buffer surrounding existing or planned mass-transit stations
- Existing or planned sewer service from an adopted Wastewater Facility Plan
- Existing or planned water service from an adopted Public Drinking Water Supply Plan
- Local bus service provided 7 days a week

While the site is mapped within the Priority Funding Area on the locational guide map to the State Plan of Conservation and Development, the local drainage system discharges to Mirror Lake, which lies within the drinking water supply watershed of the Willimantic Reservoir. As such, the site should be considered as a Balanced Priority Funding Area. State agencies that propose actions in Balanced Priority Funding Areas must provide balanced consideration of all factors in determining the extent to which it is consistent with the policies of the State C&D Plan. The proposed SRC will have no impact on the Willimantic Reservoir. Construction of the facility is consistent with the Priority Funding Area designation as well as the Balanced Priority Funding Area designation and is compatible with surrounding land uses.

1.6 Potentially Impacted Resources

The vast majority of the Connecticut Commons site is currently occupied with existing buildings and concrete walkways. Small patches of grassed areas are intermixed within the project site, with ornamental trees and landscaping. There are no wetlands or waterbodies at or adjacent to the site, and geology is primarily comprised of till. The groundwater beneath the site is classified GA and is outside of any aquifer protection area.

Table 1-1 presents a summary of resources proximal to the proposed SRC, along with an indication of the potential for impact.

TABLE 1-1
Potentially Impacted Resources Near the Proposed SRC

Resource	Potential Impacts		Comments
	Yes	No	
Wetlands		X	No wetlands in close proximity to the site
Waterbodies		X	No waterbodies in close proximity to the site
Water Quality		X	Potential to improve stormwater management at the site
Groundwater Resources		X	No aquifer protection areas or wells near the site
Floodplains		X	Site is not within a Federal Emergency Management Agency (FEMA) designated floodplain.
Floodways		X	Site is not within a FEMA designated floodway.
Fish Habitats		X	Site is not in close proximity to a stream or waterbody.
Wildlife Habitats		X	The site is fully developed with minimal habitat value.
Natural Diversity Data Base (NDDB) Species		X	The site is outside of any known NDDB species habitats.
Air Quality		X	The proposed use will not generate significant air emissions.
Coastal Resources		X	The site is not in close proximity to coastal resources.
Agricultural Lands and/or Soils		X	The site does not support agricultural uses.
Historic Sites and Districts		X	This site is not part of any site historic designated district.
Archeologically Sensitive Areas		X	The site does not support sensitive cultural resources.
Designated Open Spaces		X	The site is currently developed and is not designated as future open space.
Surrounding Land Uses		X	The proposed SRC is compatible with surrounding land uses.
Transportation		X	The site is located on the UConn shuttle bus route. The proposed use will not impact traffic or transportation.
Utilities and Services		X	The site is currently served by all major utilities.

1.7 Determination of Environmental Significance

No anticipated significant effects are anticipated from construction of the SRC relative to the following environmental resources:

- Air Quality – The proposed action will not generate significant air emissions.
- Noise Levels – The proposed action will not generate significant noise levels.
- Public Water Systems – The proposed action will not impact public water supplies relative to water use or impact a water supply resource. UConn is committed to following the Department of Public Health's recommended practices for construction projects in public water supply watersheds.
- Groundwater – There are no aquifer protection areas or water supply wells near the site and no potential for groundwater impacts.
- Flooding – The site is not located within a FEMA designated floodway or floodplain.
- Erosion or Sedimentation – The site topography is flat with little potential for erosion or sedimentation.
- Natural Land Resources or Formations – There are no natural land resources or formations at the project site.
- Tidal Wetlands or Other Coastal Resources – The site is not in close proximity to coastal resources.
- Inland Wetlands – There are no inland wetlands at or in close proximity to the project site.

- In-stream Flows – There are no waterbodies at or in close proximity to the project site.
- Historic Archeological, Cultural, or Recreational Building, Object, District, or Site – The site is fully developed with low potential for significant cultural resources.
- Natural Communities or Critical Species of Animals, Plants, or Their Habitats – There are no known natural communities or critical species present at the project site.
- Fish and Wildlife Movement – There are no waterbodies and no significant wildlife habitat at the project site.
- Use of Pesticides or Toxic or Hazardous Materials – The proposed SRC will not utilize or generate significant quantities of pesticides or toxic or hazardous materials.
- Aesthetic or Visual Effects – The proposed SRC scale and character will be congruous with adjacent building structures and land uses.
- Consistency with the State Plan of C&D – The intended use is compatible with the Balanced Priority Funding Area designation.
- Disruption or Division of an Established Community or Consistency with Adopted Municipal and Regional Plans – The proposed SRC will occur completely within the UConn campus and will not disrupt or divide an established community. The proposed SRC is believed to be consistent with local, regional, and state land use plans.
- Substantial Increase in Congestion of Traffic – The proposed SRC will not generate significant vehicular traffic.
- Substantial Increase in the Type or Rate of Energy Use – The proposed SRC will incorporate best practices of sustainability with a minimum goal of being LEED Gold certified and compliant with Connecticut's High Performance Building Regulations.
- Hazards to Human Health and Safety – No known hazards to human health and safety exist at the project site, nor are any anticipated in the future.
- Natural, Cultural, Recreational, or Scenic Resources – No natural, cultural, recreational, or scenic resources will be displaced by this project. The SRC will provide a new recreational resource.

1.8 Potential Environmental Permits, Certifications, or Approvals

No federal permits are anticipated to be required for the construction or operation of the proposed SRC. A *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* is required for construction activities with a total disturbance of 1 or more acres of land. Such permits are administered by the Connecticut Department of Energy & Environmental Protection (CT DEEP). Additionally, a *Swimming Pool General Permit* and a *Flood Management Certification*, also administered by CT DEEP, are anticipated to be required.

2.0 SCOPING AND RESPONSE TO PUBLIC COMMENTS

2.1 Scoping Process

A notice of project scoping and scoping meeting was published in the *Connecticut Environmental Monitor* on February 2, 2016. The notice also appeared in the February 16, 2016 edition of the *Monitor*. Appendix A contains documentation of notification.

A public scoping meeting was held on February 18, 2016. A copy of the presentation is included herein as Appendix B. No members of the public provided comments during the scoping meeting as documented in the meeting transcript, included herein as Appendix C.

Written comments on the Environmental Impact Evaluation (EIE) were received from the following:

1. CT DEEP
2. Connecticut Department of Public Health
3. Town of Mansfield
4. Ms. Alison Hilding, Mansfield Resident

Copies of all written comments are included in Appendix D. Responses to comments are addressed individually below.

2.2 Response to the Connecticut Department of Energy & Environmental Protection

CT DEEP provided written comments dated March 3, 2016 from David J. Fox, Senior Environmental Analyst. A summary of key points and responses follows.

1. Stormwater Management – CT DEEP noted that the Geographic Information System (GIS) local drainage basin mapping shows that the project site is within the Eagleville Brook watershed; however, based on utility systems mapping, the stormwater collection system at the project site directs runoff easterly to the Roberts Brook watershed. As such, the project should be designed and constructed so as to not cause a net increase in peak flows into Mirror Lake until such time that Mirror Lake's hydrologic constraints are firmly understood.

   Response: The University's intends to design and construct the project so as to not cause a net increase in peak flows into Mirror Lake.

2. Low Impact Development – CT DEEP encourages UConn to incorporate low impact development (LID) or green infrastructure principles and practices into the design and maintain predevelopment, on-site hydrology conditions. CT DEEP also suggests that the Eagleville Brook Watershed Advisory Team be provided the opportunity to review and comment on LID design and maintenance elements of the project plans.

   Response: The University's intends to incorporate best practices of sustainability with a minimum goal of LEED Gold certification, which will include LID principles and practices, and pre-development hydrology conditions will be maintained. Additionally, the Eagleville Brook Watershed Advisory

Team will be provided the opportunity to review and comment on LID design and maintenance elements of the project plans.

3. Air Emissions – CT DEEP encourages the use of newer off-road and on-road construction equipment that meets the latest Environmental Protection Agency (EPA) or California Air Resources Board (CARB) standards. CT DEEP also points to Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies, which limits the idling of mobile sources to 3 minutes.

   Response: The University's "Environmental, Health, and Safety Requirements for Construction, Service, and Maintenance Contractors" outlines contractor air pollution control requirements for construction vehicles/equipment for university construction projects. The University has updated its Division 1 contract specifications to include air pollution control requirements similar to that of the Connecticut Department of Administrative Services (DAS) Division of Construction Services. In addition to the following language, the University is emphasizing that newer equipment with built-in air pollution controls, rather than retrofit equipment, is preferred for all construction vehicles. Specific air pollution control requirements include, but are not limited to:

   - Contractors shall retain fuel slips for construction vehicles/equipment that are refueled on site. Low sulfur diesel fuels or biofuels are required.
   - Vehicles shall not be operated near building fresh air intakes and shall be equipped with exhaust scrubbers to minimize impact to indoor air quality.
   - Equipment shall not be allowed to idle for excessive periods of time when not in use. Connecticut law prohibits vehicles of all kinds from unnecessary idling for more than 3 minutes. Provisions are made for weather extremes, certain service vehicles, and health-related conditions (RCSA 22a-174-18). This regulation applies to ALL vehicles in Connecticut.
   - Solvent or other noxious emissions shall be evaluated as part of the work planning process to determine engineering control requirements prior to field implementation of the scope of work.

   Contract documents for the proposed SRC construction will include reference to the University's "Environmental, Health, and Safety Requirements for Construction, Service, and Maintenance Contractors," which contains these requirements.

4. Building Demolition – CT DEEP provided a number of what it characterized as standard comments regarding building demolition projects to be observed during future planning and implementation of the project.

   Response: The suggested practices will be incorporated into the project design, and pertinent requirements will be included in the demolition project specifications.

2.3 Response to the Connecticut Department of Public Health

Connecticut Department of Public Health (CT DPH) provided written comments in a February 11, 2016 letter. Specifically, CT DPH noted the planned demolition of Connecticut Commons and provided specific guidance with regard to testing for and handling lead, asbestos, and radon.

Response: The suggested practices will be adopted, and pertinent requirements will be included in the demolition project specifications. The new construction will be built using radon-resistant features for occupied spaces.

2.4 Response to the Town of Mansfield

The Town of Mansfield provided written comments in a March 1, 2016 letter. A summary of key points and responses follows.

1. Elimination of Student Housing – The town expressed concern about the potential impact of the elimination of 435 beds of student housing on off-campus housing demand and suggested that future undergraduate enrollment goals will put pressure on the community to meet housing demands. It further suggested that elimination of on-campus student housing is contrary to both the town's Plan of C&D, which encourages 70% undergraduate on-campus housing, and the University's Campus Master Plan, which projects increases in undergraduate enrollment.

   Response: Demolition of Connecticut Commons and completion of the Next Gen Residence Hall in summer 2016 will result in a net gain of 290 beds. Undergraduate enrollment over the past 5 years (fall 2011 to fall 2015) increased from 17,450 to 18,451 (~5.7%). New freshman enrollment for fall 2016 is anticipated to remain the same as fall 2015 (3,800). While NextGen identified goals for enrollment growth, actual enrollment growth must be tied to the UConn operational budget. Enrollment growth is not sustainable without operational funds, and based on current projections of UConn's operational budget, a flattening of enrollment is anticipated. In the near term, UConn anticipates only an additional 100 to 200 undergraduates enrolled beyond fall 2016 enrollment levels.

   UConn continues to provide one of the highest percentages of on-campus housing (71%) for undergraduates among the *U.S. News and World Report* Top 50 Public National Universities. Approximately 96% of freshmen and a similar high percentage of sophomores reside in on-campus housing. UConn has been consistently able to meet the student requests for on-campus housing. Despite on-campus housing availability, some students choose to live off campus, a factor that is beyond the control of the University. Students seeking off-campus housing is not a response to lack of availability of on-campus housing.

   Local zoning and enforcement will continue to be an important tool in shaping off-campus housing. UConn will continue to work with the town to address the balance of student housing opportunities provided by the private sector in the community and the housing inventory maintained on the campus. This balance is critical to both town planning and university planning to assure adequate inventories, economic viability, and appropriate choices for students.

   Goals articulated in UConn's 2015 Campus Master Plan, while intended to provide a framework for campus development, are long-term strategies that must be flexible in response to the reality of budget constraints and changes that are external to and beyond the control of UConn (i.e., private development). Therefore, elements of the Campus Master Plan may not be achieved exactly as envisioned in 2015 or may not be achieved within the time frame identified in the Master Plan. Decisions regarding new development are grounded in the Campus Master Plan framework and modified only after considering the effects on the overall development pattern of the campus.

UConn's current proposed action is consistent with the Mansfield Tomorrow Plan of C&D given the following:

- The percentage of undergraduates housed on campus is currently approximately 70%.
- Fall 2016 enrollment is not planned to rise over fall 2015 levels.
- With the completion of the NextGen Residence Hall by fall 2016, the campus will experience a net gain of 290 beds.

2. Sustainability – The town supports UConn's goal of attaining LEED Gold certification.

3. Stormwater – The town encourages the University to implement LID and green infrastructure practices as part of the project to improve stormwater quality and reduce impacts to the watershed.

   Response: The University's intends to incorporate best practices of sustainability with a minimum goal of LEED Gold certification, which will include LID principles and practices into the design. The project will be designed to maintain pre-development hydrology conditions.

2.5 Response to Ms. Alison Hilding

Ms. Alison Hilding provided written comments in a March 3, 2016 letter. A summary of key points and responses follows.

1. Housing Impact Analysis – Ms. Hilding suggests that UConn should address both short-term and long-term student housing needs and consider the housing needs of the surrounding community of Mansfield.

   Response: See response #1 In Section 2.4, Response to the Town of Mansfield.

2. Impacts of Multiple Projects – Ms. Hilding suggests that a programmatic EIE is the best approach to avoid segmenting projects and recommends developing a cumulative EIE that reviews UConn's 10-year development plan.

   Response: All environmental reviews and EIEs conducted by the University strive to avoid segmentation by considering cumulative impacts of proposed actions together with recently completed projects, ongoing projects, and reasonably foreseeable projects. When timing is conducive, and as authorized, projects are bundled together for purposes of environmental analysis.

3. Community Impacts – Ms. Hilding requests data and analysis on student enrollment and suggests that UConn consider providing 90 to 100% of the housing needs of undergraduates. She further suggests that students living off campus will put a greater demand on Mansfield's community services.

   Response: See response #1 In Section 2.4, Response to the Town of Mansfield, relative to future enrollment and potential student housing needs. The proposed SRC will have no measurable impact on UConn's enrollment, nor will it impact the Town of Mansfield's fire and police services,

zoning enforcement actions, road repair, availability of affordable housing, apartment developments, the local housing market, conversion of single-family homes, or enrollment in Mansfield's educational system.

4. Required Permits – Ms. Hilding suggests that all permits required by the proposed project be identified and questioned whether there will be any historic or archeological resources impacted by the project.

   Response: No federal permits are anticipated to be required for the construction or operation of the proposed SRC. A *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* is required for construction activities with a total disturbance of 1 or more acres of land. Such permits are administered by the CT DEEP. Additionally, a *Swimming Pool General Permit* and a *Flood Management Certification*, also administered by CT DEEP, are anticipated to be required.

5. Alternatives to the Proposed Project – Ms. Hilding suggests that the University consider alternatives to the proposed project, including adding student housing to the proposed activities and requiring all UConn undergraduate students to remain in on-campus housing through their junior year. The letter cites a "severe lack of on-campus housing" at the University.

   Response: See response #1 In Section 2.4, Response to the Town of Mansfield, relative to future enrollment and potential student housing needs. A number of proposed alternatives have been evaluated, including the no action alternative, renovation/expansion of the existing Guyer Gymnasium, use of the existing Y-Lot parking area, and the Connecticut Commons site. These were presented at the public scoping meeting. A summary of findings follows.

   No Action Alternative
   - Does not meet the project purpose and need

   Renovate/Expand Existing Guyer Gymnasium
   - Would use existing location of recreation facilities
   - Would present conflicts in maintaining existing functions and undertaking new construction
   - Would require temporary recreation facility during construction, with added expense
   - Received mixed feedback from student representatives

   Y-Lot Parking Area
   - Site is geographically removed from the campus core.
   - Pedestrian access is challenged by elevation change from the road.
   - Extensive earthwork and retaining walls would be required to prepare the site for building construction.
   - The site is located adjacent to the Hillside Circle neighborhood (private residences) and could present noise and light concerns.
   - A significant number of permitted parking spaces would be displaced.
   - Would displace existing underground stormwater detention

   Connecticut Commons Site
   - Currently developed site with minimal natural resources
   - Topography is relatively flat.

- Site is located within the campus core.
- The site has universal pedestrian access.
- Redevelopment at this location is consistent with the long-range vision for the Hillside Road District as an infill urban density project.

Given the site advantages at Connecticut Commons, the availability of utilities and services, lower construction costs, and lack of any significant environmental impacts, the Connecticut Commons site was selected as the preferred location for the proposed SRC.

6. Environmental Consequences – Ms. Hilding identified the need to address cumulative, direct, and indirect effects of the proposed action, including a restatement of the need to address on-campus and off-campus student housing needs.

Response: Direct, indirect, and cumulative environmental resource impacts due to the construction of the proposed SRC will be negligible as this site is fully developed with significant coverage by virtue of existing buildings and sidewalks. Student housing needs are addressed elsewhere in this document.

3.0 SPONSORING AGENCY DECISION

Based on the environmental assessment of the proposed Student Recreation Center and a review of comments received during the scoping process, the University of Connecticut concludes that the proposed action will have no significant impact on the environment and that preparation of an EIE under CEPA is not warranted.

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APPENDIX A

DOCUMENTATION OF NOTIFICATION

ENVIRONMENTAL MONITOR
- Current Issue
- Archives
- Publication Dates
- What is CEPA?
- CEPA Statutes
- CEPA Regulations
- What is Scoping?
- What to Expect at a Scoping Meeting
- How to Request a Public Scoping Meeting
- Guide to the State Lands Transfer Process

CEQ HOME

Environmental Monitor Archives

February 2, 2016

Scoping Notices

1. Replacement of Bridge #03993 - West St., Middletown
2. **NEW!** Cockaponset State Forest Prescribed Burn, Chester and Haddam
3. **NEW!** Construction of Student Recreation Center, Mansfield

Post-Scoping Notices: Environmental Impact Evaluation (EIE) Not Required

No Post Scoping Notice has been submitted for publication in this edition.

Environmental Impact Evaluations

1. University of Connecticut South Campus Development, Mansfield
2. **NEW!** Four Corners Sewer Extension, Mansfield

State Land Transfers

No State Land Transfer has been submitted for publication in this edition.

The next edition of the Environmental Monitor will be published on February 16, 2016.

Subscribe to e-alerts to receive an e-mail when the Environmental Monitor is published.

Notices in the Environmental Monitor are written by the sponsoring agencies and are published unedited. Questions about the content of any notice should be directed to the sponsoring agency.

Scoping Notices

"Scoping" is for projects in the earliest stages of planning. At the scoping stage, detailed information on a project's design, alternatives, and environmental impacts does not yet exist. Sponsoring agencies are asking for comments from other agencies and from the public as to the scope of alternatives and environmental impacts that should be considered for further study. Send your comments to the contact person listed for the project by the date indicated.

The following Scoping Notice has been submitted for review and comment.

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1. Notice of Scoping for Replacement of Bridge No. 03993 - West Street over Providence & Worcester Railroad

Municipality where proposed project might be located: Middletown, Connecticut

Address of Possible Project Location: West Street (between Middlefield Street and Butternut Street) over Providence & Worcester Railroad

Project Description: The bridge is structurally deficient due to the poor condition of the superstructure and the bridge is functionally obsolete due to inadequate bridge deck width, vertical under-clearance, horizontal under-clearance, and approach roadway alignment.

The bridge carries one lane of traffic, and is controlled with an alternating one-way traffic pattern with stop signs at both approaches to the bridge. The existing curb-to-curb width of the bridge is 17 feet, and the estimated 2014 Average Daily Traffic (ADT) on West Street at this site is 4,260 vehicles per day.

The proposed bridge replacement will result in approximately 800-feet of roadway re-construction. The existing vertical under-clearance of 18-feet 1-inch over the railroad at the bridge will be maintained in the proposed condition. The bridge replacement will consist of a new precast concrete deck unit superstructure supported by new concrete abutments, concrete in-line wingwalls, and mechanically stabilized earth walls. The foundation system of the bridge and walls will be constructed to facilitate undercutting (lowering) of the railroad if the tracks are lowered to provide 20-feet 6-inches of under-clearance at the bridge as part of a separate project in the future.

The proposed lane configuration of West Street consists of two 14-foot travel lanes with a 5-foot sidewalk along the east side of the road. At the bridge, the roadway will narrow to 11.75 foot travel lanes to accommodate for a 10-foot wide sidewalk/multi-use path on the eastern side of the bridge. A 5-foot wide sidewalk will be continued north of the bridge and connect to the sidewalk terminus at the intersection of Route 157 and Route 66. A 5-foot wide sidewalk will also extend from the proposed bridge to the existing sidewalk terminus located south of the bridge.

During construction, West Street will be closed at the bridge and traffic will be detoured via Route 157 to Wadsworth Street. Route 157 is a two-lane road and has an estimated 2012 Average Daily Traffic of 1,900 vehicles. Wadsworth Street is a two-lane road.

Project Map: Click here to view a map and aerial photograph of the project area.

Written comments from the public are welcomed and will be accepted until the close of business on: Friday February 19, 2016.

Any person can ask the sponsoring agency to hold a Public Scoping Meeting by sending such a request to the address below. If a meeting is requested by 25 or more individuals, or by an association that represents 25 or more members, the sponsoring agency shall schedule a Public Scoping Meeting. Such requests must be made by Friday January 29, 2016.

Written comments and/or requests for a Public Scoping Meeting should be sent to:

Name: Mr. Mark W. Alexander, Transportation Assistant Planning Director
Agency: Connecticut Department of Transportation
Bureau of Policy and Planning
Address: 2800 Berlin Turnpike, Newington, CT 06131
Fax: 860-594-3028
E-Mail: dot.environmentalplanning@ct.gov

If you have questions about the scoping for this project, contact:

Name: Mr. Louis D. Bacho, Transportation Supervising Engineer
Agency: Connecticut Department of Transportation
Bureau of Engineering and Construction
Address: 2800 Berlin Turnpike, Newington, CT 06131
Phone: 860-594-3212

E-Mail: Louis.bacho@ct.gov

2. Notice of Scoping for Cockaponset State Forest Prescribed Burn

Municipality where proposed project might be located: Chester and Haddam

Project Location: Cockaponset State Forest, Turkey Hill Block, Compartment 17, West of Filley Road and South of Old County Road.

Project Description: The proposed project is a 197 acre prescribed burn that will consume primarily leaf litter and downed branches. The intent is to partially promote the regeneration of an oak forest. Oak forests are not sustaining themselves under current natural conditions. They were historically sustained after Native American fires, agricultural land abandonment, and clearcuts. The recent lack of these activities have allowed less ecologically valuable and shade tolerant birch, beech and maple to become entrenched in oak forests. It is anticipated, given the current trajectory, that oak forests will eventually be displaced by

other hardwoods in absence of forest management that often include prescribed burns. The slow displacement of oak forests (which are extremely valuable to wildlife) throughout the east has been called an "impending ecological crisis."

The burn should top-kill or weaken understory shrubs and birch, beech, and maple saplings while creating a good seedbed for acorn germination and shade sensitive oak seedling development. The larger oaks have thick bark which should minimize injury from low intensity fires.

It is anticipated that 136 acres will be burned in 2016 and the remaining acreage in 2017 or later. Repeat burns may be scheduled if acorn crops do not develop shortly after the burns. The proposed burn window is March 15th to May 15th. The Youth Camp lean-tos nearest the burn and trails in and adjacent to the burn area will be closed only the day of the burn. The majority of the smoke is expected to clear within a few hours after completion of ignition.

Project Maps: Click here to view a map of the proposed project area.
Click here to view an aerial photo of the proposed project area.

Written comments from the public are welcomed and will be accepted until the close of business on: March 4, 2016

Any person can ask the sponsoring agency to hold a Public Scoping Meeting by sending such a request to the address below. If a meeting is requested by 25 or more individuals, or by an association that represents 25 or more members, the sponsoring agency shall schedule a Public Scoping Meeting. Such requests must be made by February 16, 2016.

Written comments and/or requests for a Public Scoping Meeting should be sent to:

Name: Kevin Grady, Protection Forester
Agency: Department of Energy & Environmental Protection
Bureau of Natural Resources
Address: Goodwin State Forest,
23 Potter Road, Hampton, CT 06247
Phone: 860-455-0699
E-Mail: kevin.grady@ct.gov

If you have questions about the public meeting, or other questions about the scoping for this project, contact:

Name: Emery Gluck, Forester
Agency: Department of Energy & Environmental Protection
Bureau of Natural Resources
Address: Cockaponset State Forest,
18 Ranger Road, Haddam, CT 06438
Phone: 860-345-8522
E-Mail: emery.gluck@ct.gov

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Any person with a disability who may need a communication aid or service may contact the agency's ADA Coordinator at 860-424-3194 or at deep.hrmed@ct.gov. Any person with limited proficiency in English, who may need information in another language, may contact the agency's Title VI Coordinator at 860-424-3035 or at deep.aaoffice@ct.gov. ADA or Title VI discrimination complaints may be filed with DEEP's EEO Manager at (860) 424-3035 or at deep.aaoffice@ct.gov.

3. Notice of Scoping for Construction of Student Recreation Center

Municipality where proposed project might be located: Mansfield

Address of Possible Project Location: Hillside Road on the University of Connecticut Storrs Campus, Mansfield, Connecticut

Project Description: UConn proposes to construct a new 200,000 square foot Student Recreation Center at the current location of the Connecticut Commons student housing on Hillside and Whitney Roads within the Main UConn Campus. The 2015 Campus Master Plan identified a need for special use facilities to support current and projected needs at the University. The proposed action, construction of the Student Recreation Center, will provide special use facilities towards meeting that need. Demolition of the existing student housing at Connecticut Commons, planned in 2016, will be required prior to implementation of the proposed action. The loss of student housing at Connecticut Commons (435 beds) will be more than offset by the opening of the Next Generation Connecticut Hall (referred to as the STEM Residence Hall during planning and design, 725 beds) currently under construction and scheduled for student occupancy in the fall of 2016. This will result in a net increase of 290 beds on campus in 2016. New construction associated with this project will incorporate best practices of sustainability with a minimum goal of LEED Gold certified.

Project Map: Click here to view a map of the project area.

Written comments from the public are welcomed and will be accepted until the close of business

on: March 3, 2016

There will be a Public Scoping Meeting for this project at:

DATE: February 18, 2016

TIME: 7:00 p.m. (Doors will be open at 6:30 pm)

PLACE: Room 146 of the Merlin D. Bishop Center; One Bishop Circle; Storrs, CT

NOTES: **Written comments and/or requests for a Public Scoping Meeting should be sent to**:

Name: Paul Ferri, Environmental Compliance Professional
Agency: University of Connecticut, Office of Environmental Policy
Address: 31 LeDoyt Road, U-Box 3055, Storrs, Connecticut 06269-3055
Fax: (860) 486-5477
E-Mail: paul.ferri@uconn.edu

If you have questions about the public meeting, or other questions about the scoping for this project, contact:

Name: Paul Ferri, Environmental Compliance Professional
Agency: University of Connecticut, Office of Environmental Policy
Address: 31 LeDoyt Road, U-Box 3055, Storrs, Connecticut 06269-3055
Phone: (860) 486-9295
Fax: (860) 486-5477
E-Mail: paul.ferri@uconn.edu

Post-Scoping Notices: Environmental Impact Evaluation Not Required

This category is required by the October 2010 revision of the Generic Environmental Classification Document for State Agencies. A notice is published here if the sponsoring agency, after publication of a scoping notice and consideration of comments received, has determined that an Environmental Impact Evaluation (EIE) does not need to be prepared for the proposed project.

No Post-Scoping Notice has been submitted for publication in this edition.

EIE Notices

After Scoping, an agency that wishes to undertake an action that could significantly affect the environment must produce, for public review and comment, a detailed written evaluation of the expected environmental impacts. This is called an Environmental Impact Evaluation (EIE).

The following EIE has been submitted for review and comment.

1. Notice of EIE for the University of Connecticut - South Campus Development

Municipality where project is proposed: Mansfield

Address of Possible Project Location: The area approximately bounded by Bolton Rd., Coventry Rd., Mansfield Rd., and Whitney Rd. on the University of Connecticut Storrs Campus, Mansfield, Connecticut.

Project Description: The University of Connecticut (UConn) has prepared an Environmental Impact Evaluation (EIE) pursuant to a Memorandum of Understanding, executed in August 2015, with Connecticut's Office of Policy & Management and Department of Energy & Environmental Protection. UConn proposes to undertake the following projects in the area of the Storrs Campus known as the South Campus:

- Construction of an approximately 30,000 gsf addition to the Fine Arts building to add production space including paint, scene, costume, and prop shops. The addition will extend north from the Nafe Katter Theatre and west from the Drama-Music Building and will results in the removal of approximately 81 spaces from Lot 1.
- Removal of nine houses along Gilbert Road and Whitney Road that are contributing structures to the University of Connecticut National Register Historic District.

The proposed Fine Arts addition will tie into campus-wide central utilities (electricity, water, sanitary sewer, natural gas, stormwater, and telecommunications) and building construction will incorporate best practices of sustainability with a minimum goal of Leadership in Energy & Environmental Design (LEED) Silver. UConn has coordinated with the Connecticut State Historic Preservation Office to finalize a formal agreement identifying mitigation measures for the removal of the cottages within the National Register Historic District.

UConn has prepared the EIE to further evaluate the potential environmental impacts of the Proposed Action, as well as other alternatives, including the No Action alternative. In addition to addressing potential impacts associated with the South Campus Development, secondary and cumulative impacts resulting from projects constructed in 2013-2015, as well as projects that will foreseeably be constructed during 2016-2018 are addressed in the SCD CEPA EIE.

Project Map: Click here to view a map of the area of the South Campus Development.

Comments on this EIE will be accepted until the close of business on: **March 4, 2016**

The public can view a copy of this EIE at:

1. Mansfield Town Clerk's Office, Audrey P Beck Municipal Building, 4 South Eagleville Road, Mansfield, CT

2. Mansfield Public Library, 54 Warrenville Road, Mansfield, CT

There is a public hearing scheduled for this EIE on:

DATE: **February 9, 2016**

TIME: 7 p.m. (Doors will be open at 6:30 p.m. to allow review of informational materials.)

PLACE: Room 146, UConn Bishop Center; One Bishop Circle; Storrs, CT

NOTES:

Additional information about this project can be found online at:

http://www.envpolicy.uconn.edu/eie.html

Send your comments about this EIE to:

Name: Paul Ferri
Agency: University of Connecticut – Office of Environmental Policy
31 LeDoyt Road, U-3055, Storrs, Connecticut 06269
Address: Phone: 860-486-9295
Fax: 860-486-5477
E-Mail: paul.ferri@uconn.edu

If you have questions about the public hearing, or other questions about the EIE, contact Mr. Ferri as directed above.

2. Notice of EIE for Mansfield Four Corners Sewer Extension

Municipality where proposed project would be located: Mansfield

Project Location: Along Route 195 (Storrs Road), approximately 3,000 feet north and 1,000 feet south from its intersection with Route 44 (Middle Turnpike Road); along Route 44, approximately 600 feet east and 3,700 feet west from its intersection with Route 195; and along portions of North Hillside Road and Professional Park Road.

Project Description: Public Act 14-98, Section 97 authorized a $3 million grant-in-aid to the Town of Mansfield to extend sewers to the Four Corners area. The project involves installation of approximately 22,000 feet of sewer piping inclusive of collection system, a trunk sewer and a force main, two submersible pump stations, and related equipment and appurtenances to provide public sewer service to the Four Corners area as well as certain properties along Route 195 and Route 44, including a manufactured home development known as Rolling Hills Community. This area has a history of sewage disposal challenges due to high water table and poor soils. Wastewater would be discharged to the University of Connecticut's wastewater treatment plant.

The Four Corners area is one of three main commercial centers in Mansfield. It serves as the northern gateway to Mansfield and has the benefit of being located at the crossroads of two state arterial roads. Plans to extend water and sewer to this area will enable redevelopment with a mixture of residential and commercial uses. Given its proximity to the new Technology Park, it is anticipated that this area will be focal point for research and light industry and may also become a priority housing location for Tech Park workers. The size of the area combined with extensive wetland resources will result in clusters of development that have been designated by the Town as appropriate for higher intensity uses.

Project Maps: Click here to view a map of the proposed sewer line.
Click here to view a map of the sewer service area.

The EIE and additional information about the project can be viewed in person at:

Department of Energy and Environmental Protection
Bureau of Water Protection & Land Reuse (2nd floor)
79 Elm Street
Hartford, CT 06106

The public can view a copy of this EIE at:

Mansfield Town Clerk's Office
Mansfield Town Hall
4 South Eagleville Road (Route 275)
Storrs, CT 06268

The EIE can also be found online at the DEEP website by clicking here.

There will be a Public Hearing for this project at:

DATE: **March 8, 2016**

TIME: 7:00 p.m.

PLACE: Council Chamber, Mansfield Town Hall; Four South Eagleville Road; Storrs, CT

Written comments from the public are welcomed and will be accepted until the close of business on: March 18, 2016

Written comments should be sent to:

Name: Carlos Esguerra
Agency: Department of Energy & Environmental Protection
Bureau of Water Protection & Land Reuse
Address: 79 Elm Street
Hartford, CT 06106-5127
Phone: 860-424-3756
Fax: 860-424-4067
E-Mail: carlos.esguerra@ct.gov

If you have questions about the public hearing, where you can review this EIE, or other questions about this project, contact Mr. Esguerra, as directed above.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Any person with a disability who may need a communication aid or service may contact the agency's ADA Coordinator at 860-424-3194 or at deep.hrmed@ct.gov. Any person with limited proficiency in English, who may need information in another language, may contact the agency's Title VI Coordinator at 860-424-3035 or at deep.aaoffice@ct.gov. ADA or Title VI discrimination complaints may be filed with DEEP's EEO Manager at (860) 424-3035 or at deep.aaoffice@ct.gov.

State Land Transfer Notices

Connecticut General Statutes Section 4b-47 requires public notice of most proposed sales and transfers of state-owned lands. The public has an opportunity to comment on any such proposed transfer. Each notice includes an address where comments should be sent. Read more about the process.

No State Land Transfer Notice has been submitted for publication in this edition.

The Adobe Reader is necessary to view and print Adobe Acrobat documents, including some of the maps and illustrations that are linked to this publication. If you have an outdated version of Adobe Reader, it might cause pictures to display incompletely. To download up-to-date versions of the free software, click on the Get Acrobat button, below. This link will also provide information and instructions for downloading and installing the reader.

Get Acrobat Reader Download the free Acrobat Reader!Access.Adobe is a tool that allows blind and visually impaired users to read any documents in Adobe PDF format. For more information, read the product overview at Adobe.com.

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Printable Version

APPENDIX B

COPY OF SCOPING MEETING *POWERPOINT* PRESENTATION

MILONE & MACBROOM

UCONN Student Recreation Center Scoping Meeting

Paul Ferri, Environmental Compliance Professional, UCONN

Jeanine Armstrong Gouin, P.E., Milone & MacBroom, Inc.

Becky Meyer, P.E., Milone & MacBroom, Inc.

Purpose of Tonight's Meeting

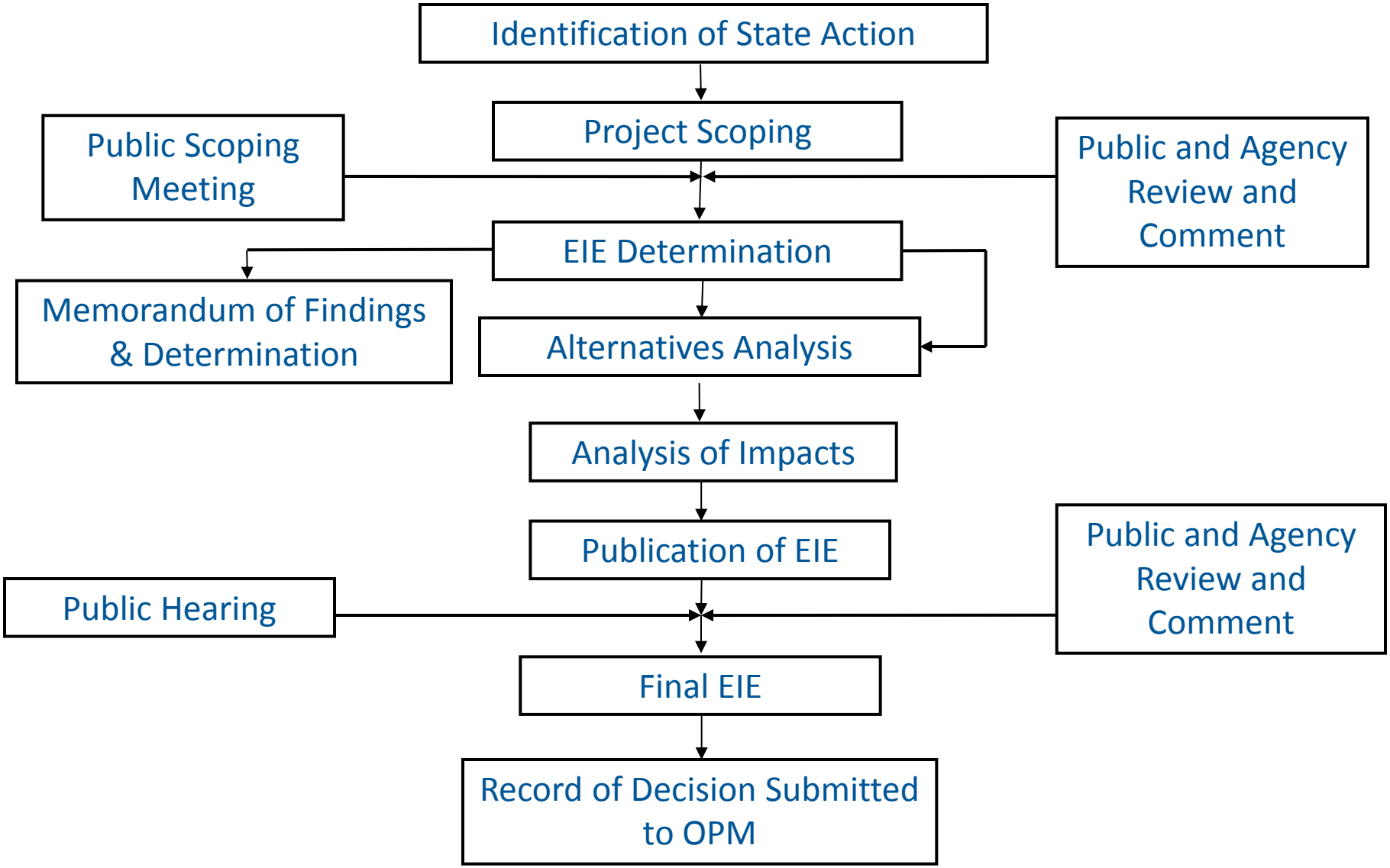
- Provide background information
- Present the project scope and objectives
- Provide information relative to the overall schedule and future efforts

- Provide a forum for gathering input
- Understand the topics of public interest / concern
- Identify questions to be answered

What is CEPA?

- A state act that applies to certain state-funded projects in Connecticut.
- A mechanism for planning and coordination among interested parties, including the public at large.
- A process of identifying and evaluating environmental impacts such that they can be avoided, minimized and mitigated.

CEPA Process



Project Purpose and Need

- Student recreation facilities are important to the campus, providing a vital component of campus life aimed at centralizing student activities
- Student recreation facilities assist in both recruitment and retention and provide productive on-campus activities
- Existing indoor recreation facilities are not adequate to support current student populations
- A new SRC will improve the quality of life on campus for students, faculty, and staff

Anticipated Project Outcomes

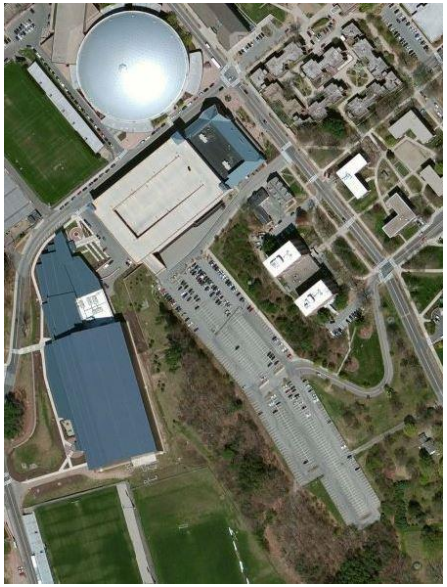
- Expand recreational facilities and student services
- Promote comprehensive health and wellness
- Prominently locate recreational facilities at campus core
- Increase student activity and visibility
- Integrate the SRC into the Hillside Road District within the student hub proposed in the 2015 Campus Master Plan

Proposed Project Elements

- 200,000 square foot building will house various activity zones including:
  - ✓ Activity Zone (gymnasium, indoor pool, specialized activity spaces)
  - ✓ Free Zone (lounge, refreshment bar, retail kiosk, etc.)
  - ✓ Support Zone (locker rooms, service/storage, etc.)
- Building will be designed to meet a Leadership in Energy and Environmental Design (LEED) certified Gold rating

Alternatives Considered To Date

- No Action
- Renovate/Expand Existing Guyer Gymnasium
- Y-Lot Parking Area
- Connecticut Commons



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Renovate/Expand Existing Guyer Gymnasium

- Identified in the May 2015 Campus Master Plan
- Would use existing location of recreation facilities
- Would present conflicts between maintaining existing functions and undertaking new construction
- Would require temporary recreation facility during construction, at an added expense
- Received mixed feedback from student representatives.

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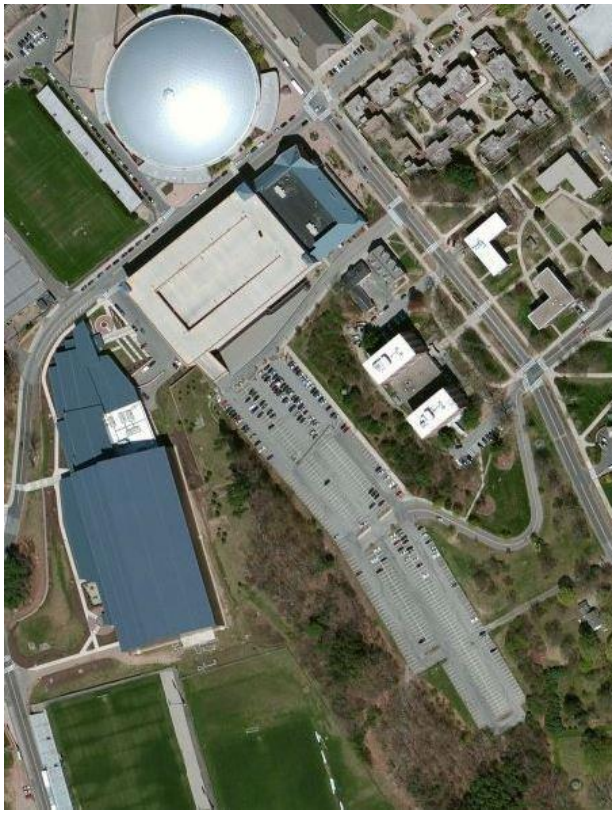
Y-Lot Parking Area

- Y-Lot is geographically removed from the campus core
- Pedestrian access is challenged by elevation change from the road
- Extensive earthwork and retaining walls would be required to prepare the site for building construction
- The site is adjacent to the Hillside Circle Neighborhood (private residences) and could present noise and light concerns
- A significant number of permitted parking spaces would be displaced
- Would displace existing stormwater detention



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Connecticut Commons

- The site is currently developed, with minimal natural resources
- The topography is relatively flat
- The site is located within the campus core
- The site currently has, and will continue to have universal pedestrian access
- Redevelopment of this location is compatible with the long-range vision for the Hillside Road District as an infill urban density project

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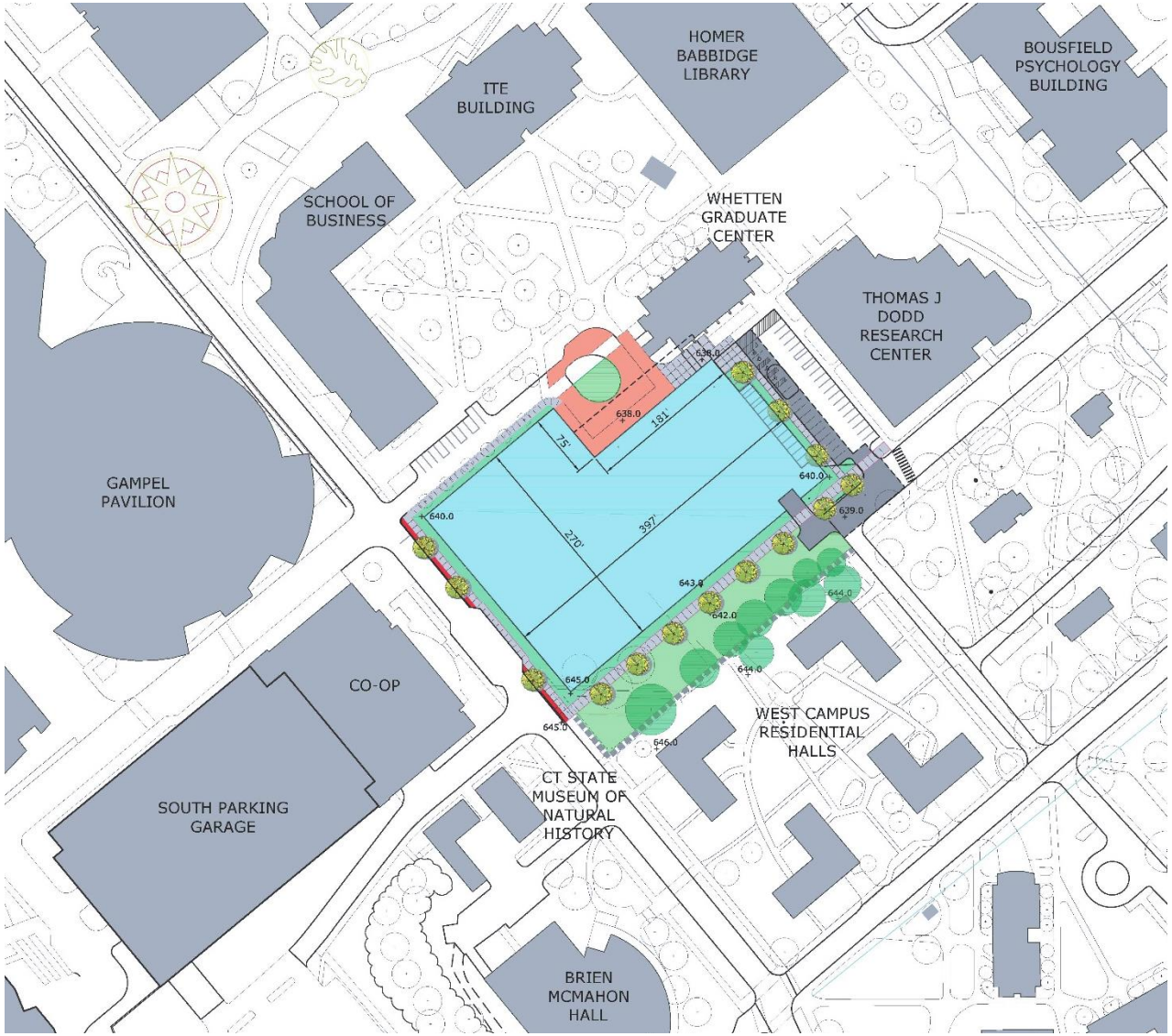
Proposed Project Location / Concept



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Impact Analysis

Physical

- Air Quality
- Noise & Light
- Traffic, Parking & Circulation
- Public Utilities
- Potable Water Supply
- Stormwater Drainage
- Solid & Hazardous Waste
- Aesthetic Resources
- Cultural Resources

Natural

- Geology, Topography & Soils
- Surface Water Resources
- Groundwater Resources
- Floodplains
- Wetlands
- Fisheries
- Plants & Wildlife/ State Listed Species
- Specimen Trees

Socioeconomic

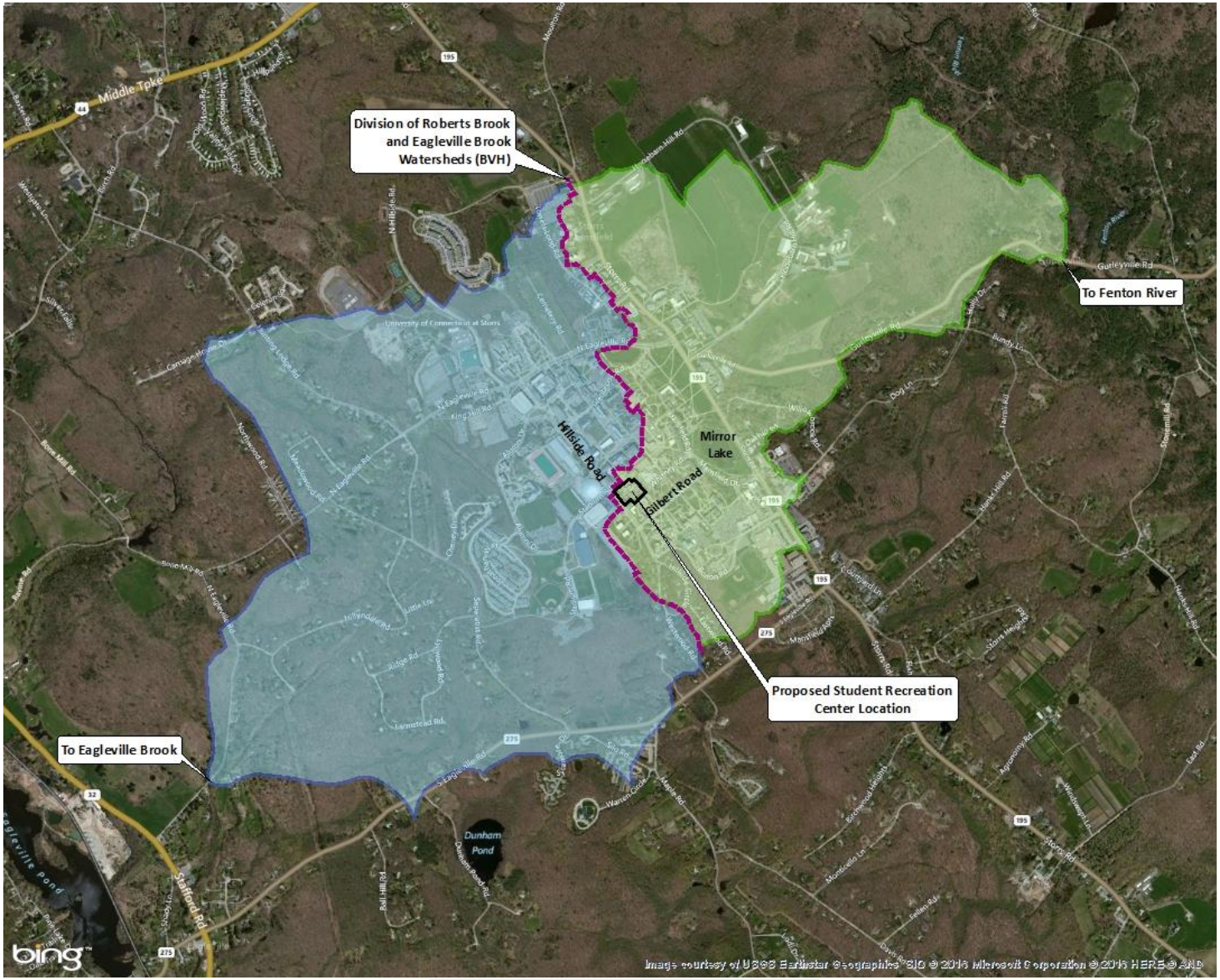
- Land Use & Zoning
- State, Local & Campus Master Planning
- Open Space & Farmland
- Public Health & Safety
- Economy, Employment & Income
- Environmental Justice
- Community Facilities & Services

Source: UConn

Affected Environment

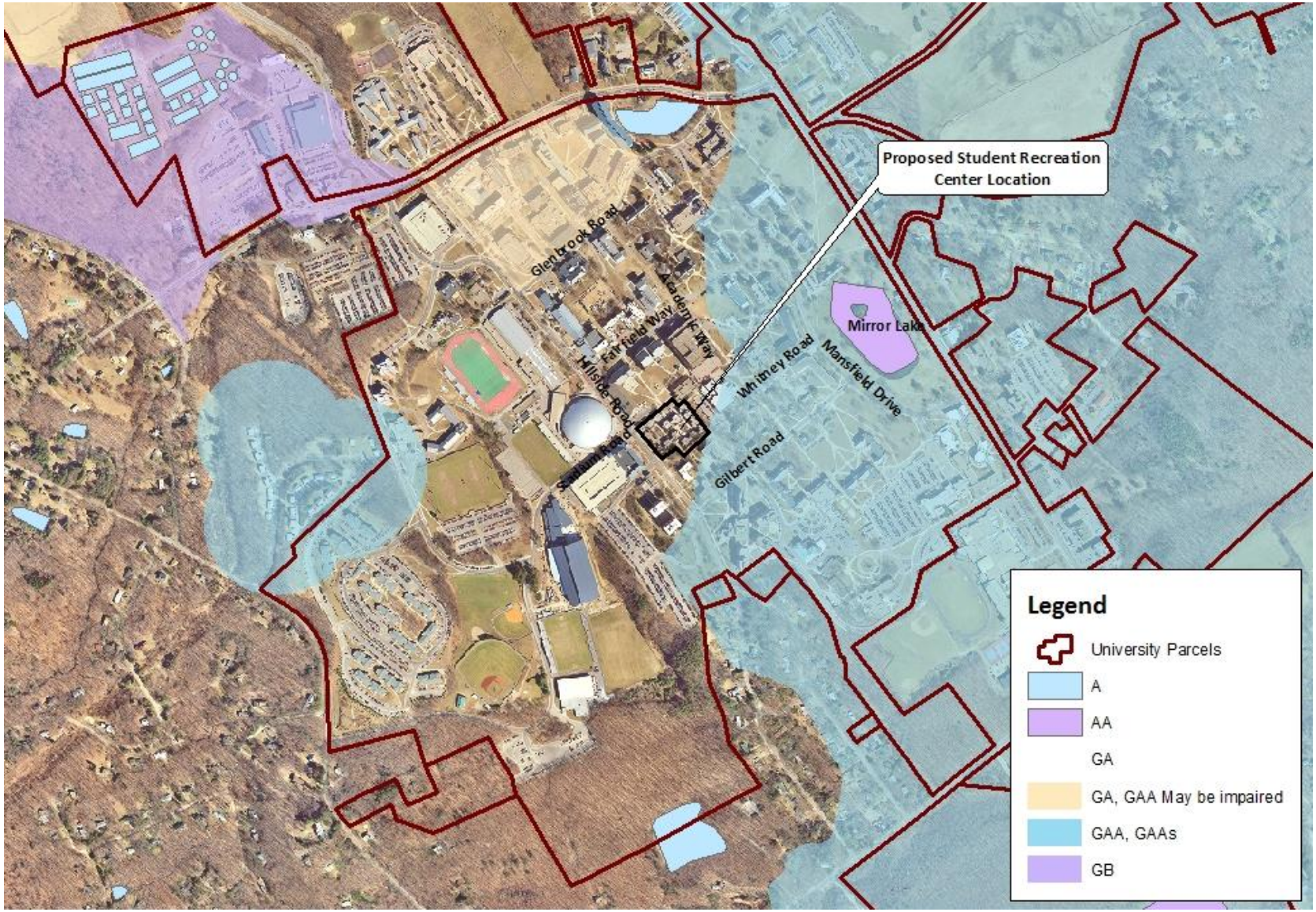
- SRC is compatible with State Plan designation
- Use is compatible with surrounding land uses and aesthetics
- Pedestrian access and transportation infrastructure is adequate
- Adequate utilities and services are available
- No sensitive cultural resources within the project footprint
- Natural resources are limited within the project footprint
- Topography, geology, and site conditions are suitable
- Opportunity to improve stormwater management controls

Affected Environment – Watershed Divides

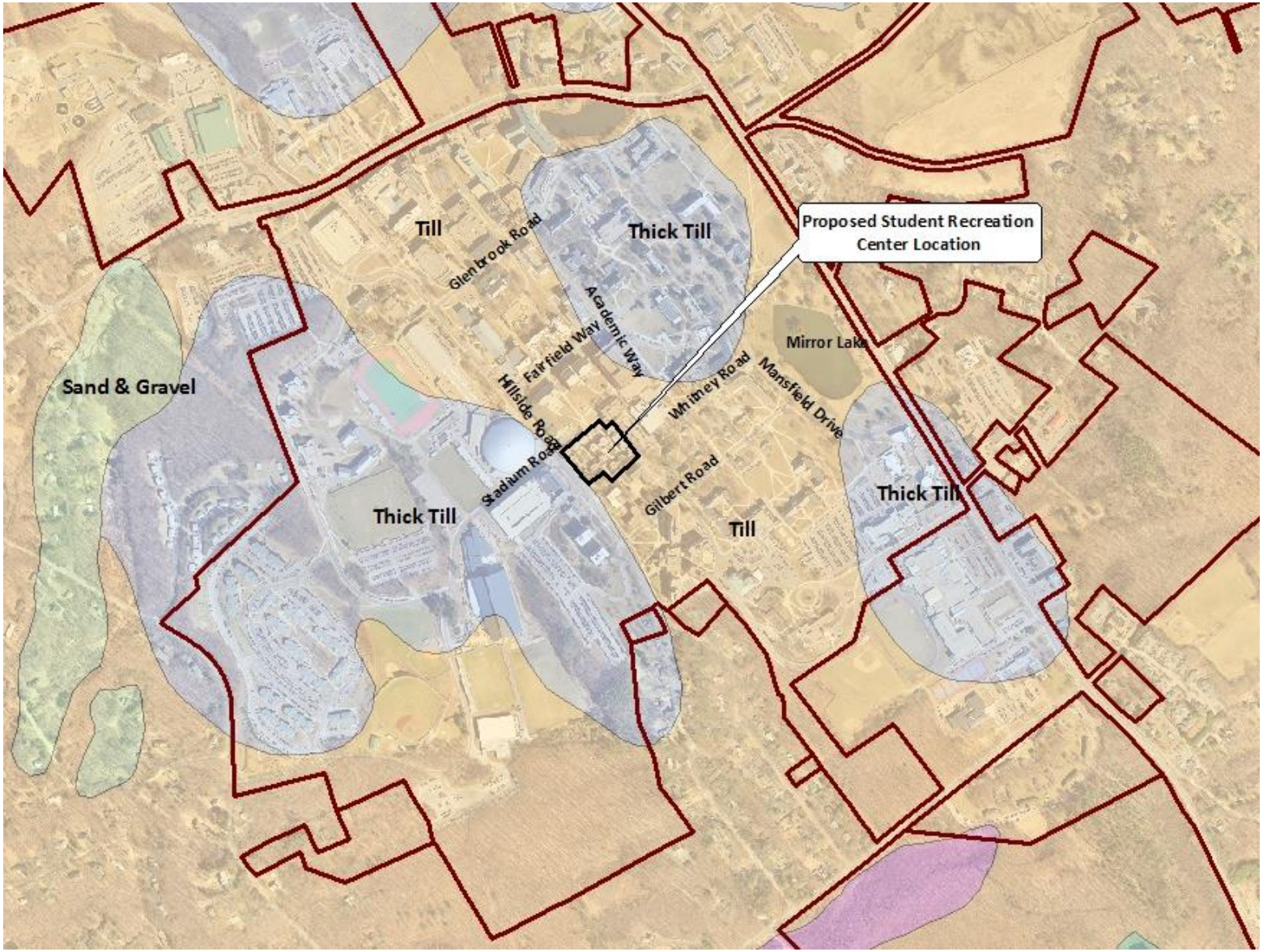


Watersheds delineated by BVH

Affected Environment – Water Quality



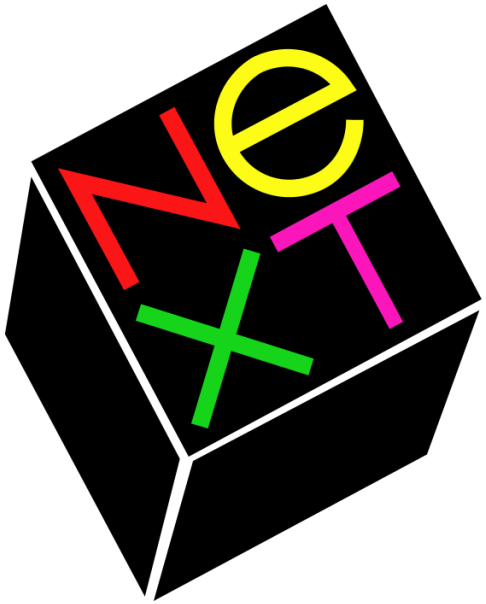
Affected Environment – Geology



Next Steps

- Review public and State agency comments

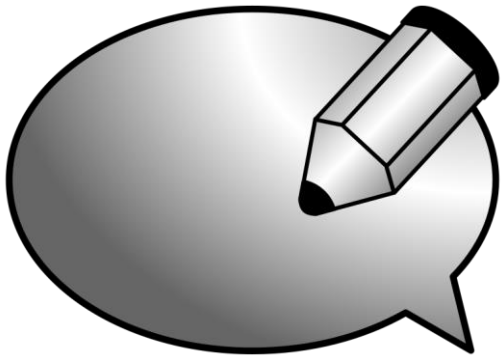
- Determine one of the following:
  - Proceed to EIE per CEPA
  - EIE not necessary per CEPA



Comments & Questions

Until March 3, written comments and questions regarding the project and/or the CEPA process may be directed to:

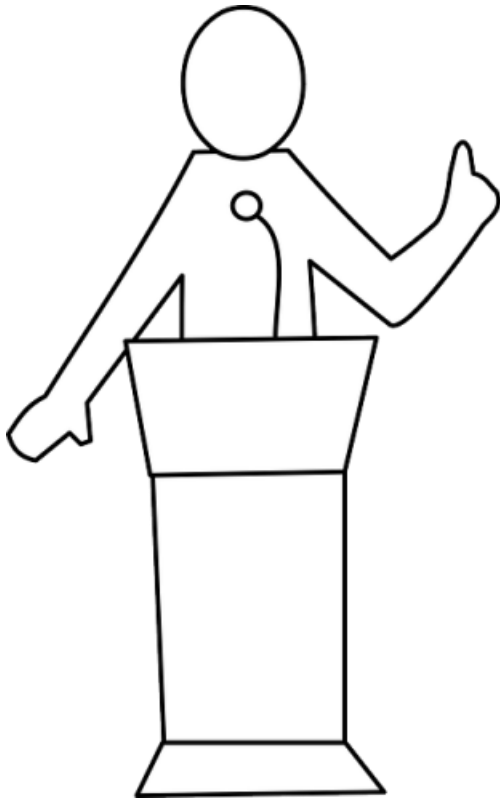
Paul Ferri, Environmental Compliance Professional
University of Connecticut
Office of Environmental Policy
31 LeDoyt Road; U-Box 3055
Storrs, Connecticut 06269-3055
f: 860-486-5477
paul.ferri@uconn.edu



MILONE & MACBROOM

Public Opportunity to Provide Input

Comments & questions are welcome!



APPENDIX C

SCOPING MEETING TRANSCRIPT

VERBATIM PROCEEDINGS

UCONN STUDENT RECREATION CENTER

CEPA SCOPING MEETING

FEBRUARY 18, 2016

ONE BISHOP CENTER
STORRS, CONNECTICUT

POST REPORTING SERVICE
HAMDEN, CT (800) 262-4102

HEARING RE: CEPA SCOPING MEETING
FEBRUARY 18, 2016

. . .Verbatim proceedings of a UConn Student Recreation Center CEPA Scoping meeting, held at the University of Connecticut, One Bishop Center, Room 146, Storrs, Connecticut, on February 18, 2016 at 7:08 p.m. . . .

MR. PAUL FERRI: Linda Painter from the Town, Alison Hilding, private citizen, fellow colleagues at UConn, Planning, Architecture and Engineering Services, UConn's Office of Environmental Policy and Milone & MacBroom, good evening and welcome for our Student Rec Center early Scoping Meeting.

I am Paul Ferri. I'm with UConn's Office of Environmental Policy, and I'm going to help moderate this early Scoping Meeting, and I'm going to turn it over to Jeanine Gouin of Milone & MacBroom, who we've hired to carry this project through the CEPA process.

MS. JEANINE ARMSTRONG GOUIN: Thank you.

MR. FERRI: You're welcome.

MS. ARMSTRONG GOUIN: Good evening, everyone, and welcome. Figure out how to use our tech equipment here. Excellent.

So the purpose of our meeting tonight is to introduce you to the Student Rec Center project. It's fairly early in the planning phase.

I will start us off with about a 15-minute or so presentation, and then we will turn it over to public comment.

We hope to give you just a bit of overview about what, where, how, when the Student Rec Center is, talk a little bit about schedule, and then hand the floor over to whoever would like to provide comment.

So what is CEPA? CEPA was enacted in the 1970s. This Scoping Meeting is being held under the umbrella of CEPA, which is the Connecticut Environmental Policy Act, and it was adopted as a means for a review of State projects that included the public and State agencies for any project that had the potential to cause environmental impact.

Through the CEPA process, our main charge is to first evaluate any potential impacts, and then avoid them, if at all possible, to minimize them to the greatest extent, and, if warranted, to mitigate any significant environmental impacts that could occur.

The CEPA process looks more complicated in this slide than it really is. It starts with the Scoping

Meeting, which is what we're doing tonight, and the Scoping period, which is a 30-day comment period. We're in the Scoping Meeting to the left of the slide tonight, whereby we introduce a project, and the public can comment on it.

That goes, then, to an EIE determination, which is determining whether the project warrants an Environmental Impact Evaluation or not. If it does, we go down through a fairly rigorous alternatives analysis, analysis of impacts, and publication of the Environmental Impact Evaluation, which, again, goes through a public comment period, and then, finally, to the Office of Policy and Management for a determination of approval or denial of the EIE.

In some cases, the Scoping process concludes that the potential for significant environmental impact is so low that a full EIE is not warranted, and then we go off to the left, which is a memorandum of findings and a determination that is submitted, indicating that the need for EIE is not believed to be necessary.

So the driving need for this project is the recognition of the importance of recreational facilities to campus life and to student health, first

and foremost, and, also, to recruitment and retention, which is an important piece of the college education.

The existing indoor facilities are not currently adequate to serve the existing UConn student population, and this is not a new finding. It's been that way for quite some time. In fact, this was a key finding of the 2006 campus master plan, which has now been around for nearly 10 years. It was also identified in the 2015 campus master plan as a need.

So a new Student Rec Center is anticipated to improve the quality of life on campus for students, as well as faculty and staff.

Some of the anticipated outcomes, expansion, of course, of the recreational facilities and student services, promotion of health and wellness, along with many other initiatives at the campus, development of a visually-prominent facility that increases student activity, as well as visibility, and then, finally, integration of recreation within the core student hub along the main Hillside campus, which was one of the initiatives identified in the 2015 campus master plan within the Hillside Road district.

So what is this project? I should say this is very early in the planning process. CEPA is

intended to act as an early planning process before design plans are finalized and contractors are poised to get going, so, unfortunately, we don't have a whole lot of graphic to show you tonight, in terms of what this project might look like, but it is planned to be a 200,000-square-foot building that will house active resting and support zones.

It will include a full gymnasium, indoor pool, activity spaces. It will also have a lounge and a refreshment bar, things of that nature, and then support services, like locker rooms and storage and whatnot. Like many buildings on the campus, this will be designed to meet LEED-certified Gold Rating.

So part of the CEPA process is looking at alternatives and comparing action alternatives against a no action alternative, which is pretty straightforward, meaning existing facilities will continue to be used. No additional facilities will be constructed.

We also looked at three action alternatives, which I'll talk about just in brief for a few minutes.

The first is renovation and expansion of the existing Guyer Gymnasium, which is just to the south of the Field House and just north of Gampel. This was

identified in the 2015 campus master plan as one of the possible locations for a new Student Rec Center.

It would use the existing footprint of Guyer and increase upon that, or expand upon that in its current location.

Doing so would present conflicts with regard to maintaining existing functions of student recreational services, as well as the need for temporary facilities during construction, which would certainly add cost to that specific location.

This was shared with a number of student representatives during the 2015 master planning process and received mixed feedback.

The second alternative that we have looked at a bit is putting the new Student Rec Center at the Y Lot parking area. If you're familiar with it, it's up on the hill behind McMahon.

This is located a little farther from the campus core. I've walked those stairs. It has some serious grade to overcome to get up there, challenging from the road on Hillside, both from pedestrian access, as well as construction phase access.

The need for structural elements, like walls and retaining structures and whatnot, would be at

issue there. That site is also located closer to private residences in the Hillside Circle neighborhood and, again, at quite an elevated grade, and, so, it could present some noise and light concerns to area neighbors.

A couple of the other aspects of this site is it would take place where existing parking is and would displace those parking spaces, which would need to be sited elsewhere on campus, as well as displacing existing storm water, underground storm water detention that is underneath the parking lot at present. That would need to be sited elsewhere on campus.

And then the last and currently preferred alternative is construction of the Student Rec Center at Connecticut Commons, which is currently an undergraduate student housing. At one time, it hosted the grad student housing.

It’s on a fairly flat topography. This footprint is completely developed today, has been for many decades. It is located closer to the campus core on Hillside, and the site is pretty much at roadway grade, so it currently has and would continue to have universal pedestrian access, as well as traffic driving up and down Hillside Road.

This location would be consistent with the

vision in the 2015 master plan for the Hillside Road district as an infill urban density and, again, in the student core of the campus.

So, again, this is very early in the stage. The blue area in the little, I would walk over there, but I would lose my mike, you can see the south parking garage and School of Business and Gampel across the streets, and this is just north/northwest of West Campus residential halls, as well. It would take place completely within the footprint of where Connecticut Commons is today.

So a formal environmental impact analysis looks at a whole myriad of physical, natural and socioeconomic factors. At this early stage, we've screened for these properties to look at the potential for significant environmental impact at the Connecticut Commons site, and we've looked at a number of things.

The Student Rec Center at this location is compatible with the State Plan of Conservation and Development designation. Its use is compatible, in terms of scale and massing and activity, with the surrounding land uses and aesthetics.

As I mentioned, the site is accessible by foot and by vehicle. Utilities are available on

Hillside, and they are adequate to serve, as they do today, serve Connecticut Commons.

There are no sensitive cultural resources or natural resources on this site. It's predominately building and concrete, with some very small grass areas, but not high-quality environmental habitat.

Physical site conditions are good; topography, geology and access. At this site, in particular, there is a good opportunity to improve upon building efficiencies, based upon energy, water and water conservation and building materials, as opposed to the Connecticut Commons building, which is of a much older generation and much less efficient.

Part of that opportunity would be to improve storm water management controls, as well, in terms of an improvement over what they are today.

A couple of slides, just showing where the site lives on campus. This shows the watershed divides between the Eagleville Brook, which is in the blue on the lower, and the green, which is Fenton River.

The natural divides are a little bit different in this location from the storm drainage divides, which puts this in the Mirror Lake and Fenton River watershed.

This slide shows groundwater classifications. It's hard to see, but it is just to the left of blue in the non-colored shading, which is the default groundwater classification of A.

Double A would be active or potential drinking water. B would be slightly degraded. You can see Mirror Lake down there is in the GB. Everything else is in the service water A, and groundwater is predominately GA, which is high quality.

This just shows an overview of geology, not terribly exciting. Mostly till and thick till. The Student Rec Center location at Connecticut Commons is entirely within the till zone, which really does not pose any obstacles to construction.

So that's just sort of a brief overview of what the project is and where it is being contemplated. Where are we now? We are at the very beginning. Again, this is the public and State agency review period. That will go through March 3rd, I believe it is, and then, at that point, a determination will be made to either proceed to a full Environmental Impact Evaluation through CEPA or not.

Comments and questions, the comment period is open. Paul Ferri at this address and fax and e-mail,

which is also on a number of sheets over there for written comments, if folks are so inclined to do that, will be accepted through March 3rd. Those comments will, then, be reviewed and evaluated and addressed.

And, with that, less than 20 minutes, we had sign-up sheets, but I don't know that we need them. I don't think that Linda and Alison are going to fight themselves to the front of the room to give comment.

Unfortunately, I'm like an Oprah Winfrey person. I'm usually walking all over. You need to be up by the microphone to be able to be heard and welcome.

Actually, I should say does anyone wish to give comments? Give that a minute.

MR. FERRI: She's asking construction detail type questions that really weren't applicable.

COURT REPORTER: You'll have to come to a microphone.

MS. ARMSTRONG GOUIN: I don't think anyone actually wants to give verbal comments tonight.

MR. FERRI: Okay. Any comments from the audience, verbal? Okay. All right, thank you, everyone. There are no verbal comments from the audience.

I understand there's going to be some written comments submitted, so I will conclude this

meeting, and thank you very much for coming.

(Whereupon, the meeting adjourned at 7:24 p.m.)

HEARING RE: CEPA SCOPING MEETING
FEBRUARY 18, 2016

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APPENDIX D

COPIES OF WRITTEN COMMENTS RECEIVED

STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

To: Paul Ferri - Environmental Compliance Analyst
UConn - Office of Environmental Policy, 31 LeDoyt Road, U-3055, Storrs, CT

From: David J. Fox - Senior Environmental Analyst **Telephone:** 860-424-4111

E-Mail: david.fox@ct.gov

Date: March 3, 2016

Subject: UConn Student Recreation Center

The Department of Energy & Environmental Protection (DEEP) has reviewed the Notice of Scoping for the proposed construction of a new student recreation center following the demolition of the Connecticut Commons student housing on Hillside Road at the Storrs campus. The following comments are submitted for your consideration.

Based on GIS local drainage basin mapping, the project site is within the Eagleville Brook watershed. However, based on utility systems mapping presented in the Environmental Impact Evaluation (EIE) for two academic and department buildings in 2009, the stormwater collection system at the project site directs runoff easterly to the Roberts Brook watershed. Assuming that the project will maintain the existing drainage pattern, the project should be "designed and constructed so as to not cause a net increase in peak flows into Mirror Lake from the present condition,until such time that Mirror Lake's hydrologic constraints are firmly understood," as stated in the January 14, 2016 letter from Richard Miller to Cheryl Chase.

The EIE should document the extent of existing impervious surface at the project site as well that which would result from the proposed design. The University is strongly encouraged to incorporate low impact development (LID) or green infrastructure principles and practices into the design, construction and maintenance of the new Recreation Center facilities and associated grounds to lessen the downstream peak flows and stormwater runoff volumes entering into Mirror Lake. The EIE for the South Campus Development reports that impervious surface area in the Mirror Lake drainage basin, both on-campus and off-campus, has increased by more than 8 acres since 1993, increasing runoff flows and volume.

The new Student Recreation Center development should aim, at a minimum, to meet pre-development, on-site hydrology conditions. Evaluation of options to meet that goal may be initiated with the preliminary site designs that indicate the south side of the new Recreation Center will have a roughly 350' long vegetated corridor/buffer landscape planting facing the shared border with the West Campus Residential Halls complex. The University should utilize the LID checklist created as part of the expanded University review of processes and procedures for on-campus construction and redevelopment projects. The Eagleville Brook Watershed Advisory Team should be provided the opportunity to review and comment on LID design and maintenance elements of the project plans.

For construction projects, the Department 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 Department 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 Department.

The Natural Diversity Data Base, maintained by DEEP, contains no records of extant populations of Federally listed endangered or threatened species or species listed by the State, pursuant to section 26-306 of the Connecticut General Statutes, as endangered, threatened or special concern in the project area. This information is not the result of comprehensive or site-specific field investigations. Also, be advised that this is a preliminary review. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site. Consultation with the Natural Diversity Data Base should not be substituted for on-site surveys required for environmental assessments. The extent of investigation by competent biologist(s) of the flora and fauna found at the site would depend on the nature of the existing habitat(s).

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. The fact sheet is available on-line at: Health & Safety Requirements.

> 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. For further information, contact DPH at (860) 509-7367. Additional information concerning regulation of asbestos may be found at: Asbestos Program.

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. For further information, contact the division at 860-424-3366. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: Special Waste Fact Sheet.

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. Landclearing 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. Additional information concerning disposal of demolition debris is available on-line at: Demolition Debris.

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. 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. Additional information concerning construction and demolition material management and waste management plans can be found on-line at: C&D Material Management and C&D Waste Management Plans.

Thank you for the opportunity to review this proposal. If there are any questions concerning these comments, please contact me.

cc: Jeff Caiola, DEEP/IRWD
Louis Corsino, DEEP.APSD
Robert Hannon, DEEP/OPPD
Eric Thomas, DEEP/WPSD

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.
Acting Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Environmental Health Section

February 11, 2016

Paul Ferri
UCONN-Office of Environmental Policy
31 LeDoyt Road, U-3055
Storrs, CT 06269-3005

RE: Notice of Scoping for Construction of Student Recreation Center

Dear Mr. Ferri:

A review of the scoping notice reveals limited information at this stage of the Student Recreation Center. However, the project does mention demolition of the existing student housing at Connecticut Commons. Should the project include any renovation, remodeling or demolition of existing buildings, or the excavation of soils, then a plan must be in place to address lead-based paint, asbestos and lead contaminated soils since these types of construction activities could result in the disturbance of surfaces that may contain lead-based paint, asbestos and/or lead contaminated soils. If a building is to be constructed, it should be built using radon resistant features for occupied spaces such as student centers.

The following summarizes the Department's position with regard to lead, asbestos, and radon:

A. Lead-Based Paint:

It does not appear that excavation or construction activities that may be associated with this project are subject to the Department of Public Health (DPH), Childhood Lead Poisoning Prevention and Control Regulations (§§19a-111-1 through 19a-111-11). However, there are other issues that must be addressed related to lead-based paint. Among these issues are the following:

- Testing of paint on existing structures marked for demolition or testing for lead in soils should be performed by a lead inspector or lead inspector/risk assessor certified by the DPH.

Keeping Connecticut Healthy
DPH
Connecticut Department of Public Health

Phone: (860) 509-8000 • Fax: (860) 509-7184 • VP: (860) 899-1611
410 Capitol Avenue, P.O. Box 340308
Hartford, Connecticut 06134-0308
www.ct.gov/dph

- Planned demolition or soil removal activities should be performed using lead-safe work practices.
- If lead-based paint or lead contaminated soil is identified, the classification and disposal of generated waste must comply with the Resource Conservation Recovery Act (RCRA) and Connecticut Department of Environmental Protection standards (e. g., Toxicity Characteristics Leaching Procedure [TCLP] testing, reporting, and record keeping requirements).
- Additionally, if lead-based paint, lead containing paint, or lead contaminated soil is identified, workers must be trained (as a minimum) according to the Occupational Safety and Health Administration (OSHA) lead standards (29 CFR 1926.62).
- Because other contaminants may also be present on the site, additional health and safety training may be required (e. g., hazardous waste and/or asbestos).

Additional inquires on the subject of lead-based paint can be directed to Krista Veneziano of the Lead Poisoning Prevention and Control Program at (860) 509-7299.

B. Asbestos Program:

The demolition of an existing facility or structure in conjunction with this project may impact asbestos-containing materials. As required by the asbestos National Emission Standards for Hazardous Air Pollutants (40 C.F.R. Part 61, Subpart M) and in order to ensure compliance with DPH regulations, a thorough inspection must be conducted to determine the presence of asbestos prior to the commencement of the planned demolition activity. A DPH licensed asbestos consultant, with certification as an Inspector or a Management Planner, must be hired to conduct such an inspection. If asbestos is identified, it must be properly abated. A DPH licensed asbestos contractor must be hired to conduct asbestos abatement that involves more than three (3) linear feet or more than three (3) square feet of asbestos-containing material. Additionally, the DPH must be provided with notification prior to asbestos abatement that involves greater than ten (10) linear feet or greater than twenty-five (25) square feet of asbestos-containing material. Asbestos abatement must be performed in accordance with all applicable federal, state and local regulations.

Additional inquiries on the subject of asbestos abatement can be directed to Ronald Skomro, Supervising Environmental Analyst of the Asbestos Program at 860-509-7367.

A. Radon

The Connecticut Department of Public Health Radon Program recommends that during the construction of the building, radon resistant features should be built into the infrastructure of the building.

The list below describes the basic components of radon resistant new construction:

- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building
- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home

- Sealing and caulking all openings in the foundation floor to reduce soil gas entry
- A vent pipe, such as 6 inch PVC pipe, to run from the gas permeable layer through the building to the roof to safely vent soil gases above the building
- An electrical junction box installed in case an electric venting fan is needed later

The facility should be tested for radon after construction is completed. If radon results are at or above 4.0 picocuries per liter (pCi/L), the existing system should be activated by installing an in-line fan.

Additional inquiries on the subject of radon resistant new construction can be directed to Allison Sullivan of the Radon Program at 860-509-7367.

Sincerely,

Suzanne Blancaflor, M.S., M.P.H.
Chief, Environmental Health Section

TOWN OF MANSFIELD

Paul M. Shapiro, Mayor

AUDREY P. BECK BUILDING
FOUR SOUTH EAGLEVILLE ROAD
MANSFIELD, CT 06268-2599
(860) 429-3330
Fax: (860) 429-6863

March 1, 2016
Mr. Paul Ferri
UConn Office of Environmental Policy
31 LeDoyt Road, U-3055
Storrs, Connecticut 06269

Subject: UConn Student Recreation Center

Dear Mr. Ferri:

The Mansfield Town Council and Planning and Zoning Commission (PZC) offer the following comments and recommendations with regard to the proposed Student Recreation Center:

- *Proposed Site.* The Town does not support the development of the proposed recreation center on the site of the Connecticut Commons residence halls.

  We are concerned beyond measure at the probable impact the proposed elimination of 435 beds of student housing will have on our community. Over the last five years, full-time undergraduate enrollment at the University has increased by 9%; by contrast, the number of students residing in campus housing has increased a mere 1%. While future enrollment increases may be uncertain due to state budgetary concerns, the recent enrollment growth, as well as the State's goal to increase undergraduate enrollment by 5,000 students over the next ten years, will only exacerbate an already precarious housing situation. Without an adequate supply of on-campus housing for both current and future students, the pressure to meet housing demands will continue to fall on our community, creating significant impacts for our residents.

  The STEM residence hall currently under construction will add 725 beds to the current inventory; however, the proposed demolition of Connecticut Commons will reduce that gain to 290 beds. The proposed elimination of student housing as part of this project however, in addition to the decision of the University to suspend the proposed development of an Honors residence hall which was expected to add 650 beds, will result in a net loss of 360 beds.

  These decisions place the burden of addressing student housing needs on the community. The impact has been felt throughout town as previously owner-occupied homes are converted to rental units, usually housing three, if not more, students. This conversion trend and the resulting impacts on neighborhoods recently reached a boiling point with residents, resulting in the Town Council establishing a joint Ad Hoc committee with the PZC to evaluate current rental housing regulations and enforcement.

  The proposal to eliminate on-campus student housing is also contrary to both the Town's Plan of Conservation and Development and the University's campus master plan. The Mansfield Tomorrow POCD identified concerns related to rental housing trends and identified the need to

maintain a balance between owner-occupied housing and investor-owned housing for rentals. The need for continued on-campus housing development was identified in two actions:

- Goal 7.3, Strategy C, Action 2: Continue to encourage UConn to house an average of 70% of undergraduates in on-campus housing over each five-year period.

- Goal 7.3, Strategy C, Action 3: Work with UConn and legislators to support continued development of on-campus housing.

The campus master plan completed in 2015 not only identified the need for additional on-campus housing, it specifically identified the replacement of Connecticut Commons with a new 700 bed residence hall. Potential sites identified in the master plan for the student recreation center now proposed, included Y-Lot and the site of the existing field house. Neither of those options involve the elimination of student housing and in the Town's view both of these potential sites are vastly preferred over the present proposal.

The elimination of on-campus housing as well as the failure to significantly increase the inventory of on-campus beds in the short term not only puts a burden on the community, it also impacts the ability of the University to renovate and/or redevelop existing residence halls without reducing availability of on-campus housing below current levels.

- *Sustainability.* We support UConn's goal of attaining LEED Gold certification for the proposed recreation center and encourages the University to include implementation of multiple strategies recommended in the Sustainability Framework Plan in the development of this facility.

- *Stormwater.* We encourage the University to implement Low-Impact Development and Green Infrastructure practices as part of the project to improve stormwater quality and reduce impacts to the watershed.

If you have any questions regarding these comments, please contact Linda Painter, Director of Planning and Development.

Sincerely,

Paul M. Shapiro
Mayor

JoAnn Goodwin
Chair, Mansfield PZC

Cc: Town Council
Planning and Zoning Commission
State Senator Mae Flexer
State Representative Gregory Haddad
State Representative Linda Orange

March 4, 2016

Paul Ferri, Environmental Compliance Professional
University of Connecticut, Office of Environmental Policy
31 LeDoyt Road, U-B
Storrs, CT 06269-3055

Dear Mr. Ferri,

We have reviewed the draft Environmental Impact Evaluation South Campus Development dated January 2016 and offer the following comments that should be addressed in the final EIE. We understand from the Connecticut Environmental Monitor that the project was described as follows:

> **Project Description**: This scoping notice encompasses multiple University of Connecticut (UCONN) projects, including the Honors Residence Hall for which a Scoping Notice was published in the November 18, 2014 Environmental Monitor.
>
> UCONN proposes to undertake several projects in the area of the Storrs Campus known as South Campus. The projects are in close proximity, being located in the area approximately bounded by Bolton Road to the south, Coventry Road to the east, Mansfield Road to the east and north, and Whitney Road to the west. The earliest these projects are planned to start is during the fall of 2015 and all are expected to be complete prior to the fall of 2017. As these projects have a common setting and construction schedule, UCONN will address Connecticut Environmental Policy Act (CEPA) requirements for these projects by grouping them into a single Proposed Action known as the South Campus Development (SCD). The SCD will consist of the following elements, all of which are consistent with the on-going campus master planning process:
>
> - **Construction of a new Honors Program Residence Hall** at the corner of Gilbert Road and Mansfield Drive. The proposed residence hall will include approximately 650 beds and an integrated dining facility providing approximately 700 seats. The proposed facility will total approximately 210,000 gross square feet (gsf) within a 5- to 6-story structure and an 8- to 9-story tower element. Removal of an 18-space parking lot off of Gilbert Road will also result from the Honors Residence Hall project.
> - **Construction of an approximately 30,000 gsf addition** to the Fine Arts building to add production space including paint, scene, costume, and prop shops. The addition will extend north from the Nafe Katter Theatre and west from the Drama-Music Building and will also result in removal of 28 to 34 spaces from Lot 1.

- **Removal of two houses on the south side of Gilbert Road** that are contributing structures to the University of Connecticut National Register Historic District.
- **Closure of Gilbert Road to vehicular traffic for approximately 950 feet** between Whitney Road and Mansfield Road to create a pedestrian walkway and modifications to Whitney Road, potentially including removal of an undetermined number of on-street parking spaces, to accommodate redirected traffic from Gilbert Road.
- **Closure of Coventry Road and Maple Lane** to vehicular traffic and replacement with a pedestrian access that will also accommodate emergency (life/safety) vehicles and equipment.

Despite this description, the University decided to alter the scope of this project to exclude the proposed Honors student housing. The draft EIE acknowledges the mid-stream change in the scope of the EIE document by providing the following explanation in its executive summary:

> At the time of CEPA scoping for the project, the Proposed Action included the construction of an Honors Residence Hall and Dining Facility at the corner of Gilbert Road and Mansfield Road, north northeast of the existing South Campus Residence Halls. The residence hall design included approximately 650 beds and an integrated dining facility providing approximately 700 seats and an estimated 4,000 to 4,500 meals per day. After completing design for the Honors Residence Hall project in September 2015, the University concluded that there are uncertainties that must be evaluated prior to proceeding into the bid and construction phases on this project. The project is being deferred at this time to further evaluate operating budget impacts, student enrollment, and the impact of private, off-campus housing developments.

While such changes may appear necessary to the university to ensure proper design and planning for increased student housing stock, they also raise concerns about 1) a segmenting planning process, 2) a pattern of shirking university responsibility for providing for on campus housing and 3) the lack of a comprehensive planning process for student housing at UCONN. Our concerns have taken on greater relevance as we have recently learned of a major privately funded off campus housing project being proposed for Hunting Lodge road. The timing of the University's dismissal of the Honors Residence Hall and the proposed creation of a major private sector housing project by Ponde Place LLC (reportedly in association with Education Development Realty - EDR) on Hunting Lodge Road suggest the two apparently independent actions may have an internal connection.

The draft EIE, by failing to address student housing issues, gives the impression that student housing is not a pressing university priority. In reality, the situation demands priority attention. Over 10,000 UCONN students currently live off campus and the bulk of these students live in Mansfield and the immediately surrounding rural communities. The university has an affirmative responsibility to meet the housing needs of its student enrollment and yet the draft EIE makes no mention of these pressing housing needs – despite the fact that the Honor Residence Hall was a central element of the scoping document. This is unacceptable from a process perspective (i.e., the university needs to provide a more in depth explanation of why this student housing complex is not needed) and poses a real economic impact on the town of Mansfield. The university can't simply off load its housing responsibilities onto the town of Mansfield without pursuing a thorough environmental review of such impacts on the community.

We urge the university to revisit the draft EIE in light of our comments below:

Housing impact analysis: The University of Connecticut needs to address not only the short term need for housing for its student population, it also needs to consider long term housing needs both of the student body but also of the immediately surrounding community of Mansfield. The EIE is a flawed document if it does not address the student housing needs associated with increasing student enrollment at the university. Without such an analysis, the draft EIE leaves the university without a long range master plan for addressing other housing needs as they emerge. Simultaneously, to the extent that the university does not plan to accommodate all students on campus, the draft EIE must address the adverse impacts to Mansfield's housing stock of tacitly encouraging students to live off campus. The draft EIE essentially eliminates many buildings that create vacant land that may enable the construction of future housing on or near the site of Gilbert Road. This approach is tantamount to segmented planning since these Gilbert Road buildings are not being razed for no reason at all – their very elimination appears to be premised on the notion that student housing will be placed on this area of campus. An EIE document can't subdivide projects into phases to suit the whims of the university. The notion that Gilbert Road housing can be eliminated without considering the environmental impact of what will take their place is unfathomable to this reviewer and is in sharp conflict with prevailing case law concerning the proper scope of an EIE document.

Address Impacts of Multiple Projects: As with several other pending projects, the University of Connecticut should avoid segmenting the planning process for new construction of a wide range of facilities, integrally related yet individually evaluated, in separate EIE documents. A programmatic EIE is the best approach to avoid segmenting the multiplicity of projects that are integrally related but are being planned (through the EIE process) as if they were all separate. When a programmatic EIE (i.e. what CEPA

calls a Cumulative EIE. For CEPA details see: https://www.cga.ct.gov/2004/rpt/2004-R-0610.htm) is created the synergies, conflicts and inter-relationships can be addressed more thoroughly and projects can be better understood within the broader development plans of the university. For this reason, we highly encourage the university to develop a Cumulative EIE that reviews its 10 year development plans. This approach will assist Mansfield residents to understand the unique needs and purposes of each individual project. Without such an approach, the university's EIE strategy leads to the appearance of a segmented planning approach with limited transparency for the public. The recent Memorandum of Understanding (MOU) between the Office of Policy Management (OPM) and UCONN allows for grouping of a limited number of projects, but it would be preferable to evaluate the impacts of all planned projects simultaneously.

Community Impacts: As presented, the planned deferral of the Honor Residence housing is intended to give the university greater time to consider student housing needs. If this is the case, this draft EIE should be postponed and a new scoping hearing held on the more narrowly defined project envisioned in September 2015. However, if the university proceeds without a revised scoping hearing, then it must address housing needs within the draft EIE so that the potential impacts of building or not building housing can be properly assessed. Moreover, without data provided on student enrollment or university plans to expand enrollment over time, it is not clear if the long term impact of this project on Mansfield housing will be positive, neutral or negative. One of the goals the university should consider is providing 90 to 100 percent of the housing needs of undergraduates on campus. While this may not be immediately feasible, it should be a key policy driving all student housing projects on campus. The EIE needs to address the impact of an increasing number of students living off campus and how this project will affect that off campus housing situation. Will the proposed project – by failing to build the Honor Residence Hall - increase the total number of students living off campus? If so, what will the community impacts be on Mansfield (e.g. increased fire and police services, increased zoning enforcement actions, increased road repair, reduction in affordable housing, increased apartment developments in or near previously rural, ecologically sensitive and/or single family residential zones of town, housing market destabilization impacts, conversion of single family homes to student rentals and apartment rentals and their impacts on K through 12 enrollments, etc.)

In summary, the draft EIE fails to address the complete project that was envisioned in the scoping document and as a result the university has not demonstrated why the Honors Residence Hall should be dropped from the project when its purpose is integral to the current EIE purpose and scope (i.e. see scoping notice). The university should immediately issue a notice of a revised scoping meeting to revisit the significant alterations that have been made to the proposed project so that the public has adequate time, an adequate process, and adequate information to properly consider the impacts of these changes.

Should you have any questions on these recommendations for the scope of the proposed EIE, please contact me via email at aahilding@gmail.com

Sincerely,

Alison Hilding
17 Southwood Road
Storrs, CT 06268

I am a member of the Connecticut Council on Environmental Quality and a commissioner for the Connecticut Commission on Children. However, I am writing this as a private citizen do not represent either above organization in this communication.