Summary of Scoping Comments and Responses

The Mansfield Planning and Zoning Commission Provided written comments from Paul Aho, Chair, dated March 22, 2022		
Comment Number	**Comment**	**Response**
PZC MAC #1	The proposed development would increase the number of beds on the site from 270 to 900 and the number of parking spaces from 130 to 450; tripling both the occupants (Sec. 22a-1a-3-b-10) and trip generation. This increase in traffic will have corresponding impacts to air quality (Sec. 22a-1a-3-b-14) and greenhouse gas emissions (Sec. 22a-1a-3-b-19). The statement that existing "transportation infrastructure appears adequate" has not been backed up with any data or analysis. Based on the size of the proposed development (300,000 square feet, 450 parking spaces), it will be considered a major traffic generator, triggering a requirement for approval from the Office of the State Traffic Administration. While it is anticipated that primary impacts will be to state roads, the traffic analysis should include study of potential impacts to local roads such as Eastwood and Westwood that may be used to access campus to avoid the Storrs Road/South Eagleville intersection given the substantial increase in traffic.	The project is early in its design; as such, the bed and parking counts are approximate, and subject to change during subsequent phases of design. Traffic engineers will analyze existing and proposed conditions in a traffic impact study as part of the EIE and a permit application will be submitted to DOT's Office of the State Traffic Authority (OSTA) as part of the construction document phase. Work along South Eagleville Road will also require an encroachment permit from DOT during construction.
PZC MAC #2	The distance of the subject property from the main campus may detract from UConn's efforts to become a sustainable, walkable campus and decrease the use of vehicles. Due to this distance, the EIE should incorporate evaluation of the impact of the necessary increase in bus service to connect this development to the new STEM campus area.	Located a short (approximately 5-minute) walking distance to campus, the project location has long served as student housing and is also accessible by a range of transportation modes such as bicycles, buses, and passenger vehicles. The proposed action will maintain those options.
PZC MAC #3	Should UConn be considering installation of the long-proposed campus access road between Bolton Road and South Eagleville Road, parallel to Eastwood Road, as part of mitigation to improve connectivity, the EIE should include a full evaluation of the impacts of such a connection.	The planned road connecting Bolton Road to South Eagleville Road is a long-term potential improvement as outlined in the Campus Master Plan and is not part of the Mansfield Apartment Redevelopment Project. It will have its own CEPA process and traffic analysis if it becomes a project in the future.

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PZC MAC #4	The Town would strongly encourage the new access driveway for the site to align with the exit to the municipal parking lot (western curb cut adjacent to the Mansfield Community Center). This would increase the separation distance between the access to the property and the intersection, and also provide for much needed traffic calming and pedestrian infrastructure as further described below. This recommendation is made with the understanding that redesign of the Town's own parking lot may be necessary.	Comment noted for EIE and design development.
PZC MAC #5	The proposed project only increases the need for significant improvements to pedestrian circulation, contrary to the assessment in the scoping presentation that "pedestrian access . . . appears to be adequate." While a sidewalk connects the site to the sidewalk on Route 195, that route has not been used by many pedestrians, including former residents of Mansfield Apartments. Many pedestrians choose to cross Route 275 mid-block to cut through the municipal complex and high school to access Route 195 and Bolton Road. With the significant increase in population proposed by the project, improvements to pedestrian facilities including physical barriers will be needed to direct pedestrians to safe routes. Other pedestrian improvements that should be considered include widening of the existing sidewalk on the south side of Route 275 to accommodate the increase in residential population created by the project as well as installation of a sidewalk on the north side of Route 275 connecting Route 195 to the existing WRTD bus stop.	The University will continue to work toward common goals near the project area, including supporting the Town's recently awarded Communities Challenge Grant for improving pedestrian safety, sidewalk and trail extensions along South Eagleville Road and assisting DOT with its Road Safety Audit for Routes 275 and 195. The proposed project will improve pedestrian circulation along South Eagleville Road and the University will work with the Town to ensure consistency with other planned improvements in the area.
PZC MAC #6	One concept to address both traffic and pedestrian circulation concerns is the installation of landscape medians similar to those in Storrs Road leading to the intersection. Such medians would discourage mid-block crossings and also help to slow traffic. Changes to access driveways for both Mansfield Apartments and the municipal complex would be needed to increase the effectiveness of these medians.	The proposed project is limited to University property and will not extend into South Eagleville Road. The University will work with the Town to ensure that contemplated improvements to South Eagleville Road will not be impeded by the project. See Response PZC MAC #5.
PZC MAC #7	The 2020 Water Supply Plan developed for the University indicates fire flow tests at the Mansfield Apartment Complex achieved only 590 gallons per minute. This flow may be inadequate for multi-story buildings.	Comment noted for EIE and design development.

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PZC MAC #8	Given the increase in overall development intensity on the site, it is anticipated that impervious cover will also increase significantly. UConn has indicated through the scoping process that opportunities exist to improve water quality. Given the sensitivity of abutting natural resources, it is imperative that stormwater generated by the project be retained and treated on-site, preferably using Low Impact Development Practices to the greatest extent possible with a focus on disconnecting impervious surfaces from stormwater systems.	The University understands and appreciates the sensitivity of Moss Sanctuary. The purpose and need of low impact development (LID) practices are also understood and will be described in the EIE.
PZC MAC #9	The Mansfield Tomorrow Plan of Conservation and Development identified specific design principles for redevelopment of the site based on its location and the need to protect the adjacent preserve. The POCD identifies this area as a transitional area between Downtown Storrs and adjacent rural neighborhoods. As such, the POCD calls for scale and massing that is lower than the four to five stories that comprise much of Downtown. The proposal for two to four buildings at five to seven stories in height is in direct contradiction to the need for scale and massing that provides a transition to the one to two-story buildings that characterize residential buildings in the surrounding area and would have a significant impact on the physical character of the area.	Whereas the University shares some of the goals articulated in the Town of Mansfield's (POCD) for this site, the POCD is not a controlling or binding document pertaining to development of university property. The primary drivers for the size, scale and scope of the proposed project are to meet the University's needs for housing diversity and renewal. Furthermore, and although the POCD proposed University property as a future site for Compact Residential development, a subsequent update to the Town of Mansfield's zoning map (effective June 30, 2021) correctly identified the parcel as Institutional.
PZC MAC #10	More information is needed to determine if the scale, massing, and density of the development will impact the Moss Sanctuary. The Sanctuary is a significant recreational resource valued by the community for its trails, historic pond and associated stone dam (dating back to 1846), scenic vistas, and diversity of plants and animals.	Comment noted for EIE and design development. The University is mindful of the characteristics of Moss Sanctuary and its history, including various resource studies that have been completed in the past.

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PZC MAC #11	The Conservation Commission has noted that the proposed redevelopment has the potential to impact water quality of seeps and headwater streams on site and adjacent to the project site in Moss Sanctuary. Such impacts could have negative impacts on water quality in Tift Pond as well as the Fenton River, which has a Class AA water quality designation, meaning it is suitable for existing or proposed drinking water supply, fish and wildlife habitat, recreational uses (with possible restrictions), agricultural and industrial supply.	See Response PZC MAC #8. Comment noted for EIE and design development.
PZC MAC #12	Moss Sanctuary is home to an extensive wetland system, portions of which appear to extend on to the subject property. Protection of these natural resources should be a primary driver of project design. The lack of information provided with regard to field delineation of wetlands and other surface and ground water features, combined with a lack of a concept plan makes it impossible to fully understand the potential impacts of the project on these important natural resources.	The University has retained a professional wetland scientist to delineate wetlands and watercourses on the subject property. Information from the delineation will be included in the EIE.
PZC MAC #13	While the proposed project falls under the jurisdiction of UConn Public Safety services, its proximity to the Resident Trooper's office and Mansfield Fire Station 307 makes it likely that the Town will be involved in emergency responses to the complex, which may impact ability to serve other non-UConn properties.	This parcel been used as housing since the 1940s. University Safety has worked collaboratively with the Town on emergency management and response in the past and will continue to do so.
PZC MAC #14	The substantial increase in populations has the potential to negatively affect recreational resources such as Moss Sanctuary, both through the impacts to the natural environment of increased usage and associated littering as well as on potential for development of a future nature center as described in the Conservation Easement for the property.	The proposed project will be limited to University property. The Town has agreed to enhancing access to Moss Sanctuary from Birchwood Heights Road and the University will install temporary signage during construction to direct visitors that access point. The University will continue to collaborate with the Town on any potential impacts including those related to student usage and conduct.

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PZC MAC #15	In addition to the normal environmental considerations of an EIE, it is imperative that UConn conduct a full EIE to ensure that the established conservation restriction held by the Connecticut Park and Forest Association (CFPA) is not compromised by the proposed action at the abutting UConn property.	Comment noted for EIE and design development.
PZC MAC #16	The full EIE should include an inventory of current conditions in the Moss Sanctuary, both natural resources, wetland quality, and recreational use to establish a base line and better understand and predict potential impacts of the proposed development. Both potential physical environmental quality effects and the increase recreational use pressure due to increased population residing next door should be fully evaluated. The proposed increase in parking area will likely exacerbate impacts of runoff, and the increased population will likely adversely impact condition of existing trails. A significant upgrade in trail construction may be necessary to avoid adverse impact to trails by an increase in the number of adjacent residents who will use them. The EIE should identify actions needed to maintain a quality natural area experience, and these actions should be considered part of the project cost.	The proposed project will be limited to University property. See Response PZC MAC #10.
PZC MAC #17	An important design principle noted in the Town Plan of Conservation and Development (POCD) is that the Moss Sanctuary is essentially in the back yard of the Mansfield Apartments, but its boundary should be considered a primary design frontage of any redevelopment and as important as road frontage. Utility and service areas should not be located to impact the Moss Sanctuary experience, but rather be interior to the development. In addition, the proposed 5-7 story buildings may be visible from within Moss Sanctuary, and this would negatively impact the view shed and the experience of the natural area.	Comment noted for EIE and design development.
PZC MAC #18	The post-development sanctuary access should be carefully designed, rather than an afterthought. Provision of parking as allowed under the easement granted by UConn in UConn's deed to CFPA is unlikely to be of use without a workable mechanism to ensure it is available for recreational users not familiar with the area. Although the access must allow vehicular access into Moss Sanctuary, a careful design should discourage the use of	The University will make any necessary accommodations for parking per the easement and work collaboratively with the Town to encourage appropriate use. Trail access to Moss Sanctuary will remain as it is today.

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	private vehicles, including trail bikes, on the Moss Sanctuary trails. Although trail bike use is prohibited by the conservation restriction, the increased number of bike owners adjacent to the Moss Sanctuary will require increased signage and enforcement to ensure this prohibition is honored.	
PZC MAC #19	The potential for increased Town expenditures for maintenance and enforcement, due to increased usage, including expectable prohibited uses, should be evaluated in the EIE, and a solution for this cost impact proposed.	Redevelopment of this parcel was identified in the 2015 Campus Master Plan. The University will continue to collaborate with the Town on the stewardship of Moss Sanctuary.
PZC MAC #20	The Town may need to consider developing a second access point to Moss Sanctuary on the corner of Birchwood Heights Road and Route 195 that is not "buried" in the UConn parcel. This would encourage Town residents to take full advantage of the Moss Sanctuary without having to traverse a high-density student housing area. This would be an additional expense for the Town.	The University and the Town have coordinated a new access from Birchwood Road with signage that will allow Sanctuary access during construction. An access from the Mansfield Apartment Complex – with signage - will reopen at the Sanctuary northern boundary following construction.
PZC MAC #21	As previously indicated, a full traffic study is needed as part of the EIE; furthermore, critical elements of the traffic study include increased pedestrian traffic and increased potential for car/pedestrian conflict, especially for those crossing South Eagleville Road, already a concern without increased development. In addition, the development is likely to increase the number of pedestrians at the Route 275/195 intersection and affect traffic congestion on both roads. One element of pedestrian safety to evaluate is that currently most users of the Moss Sanctuary park their vehicles at the Community Center and then cross South Eagleville Road by foot, and the increased traffic will likely make this access pathway less safe.	See Response PZC MAC #1.

The Mansfield Town Council provided written comments from Antonia Moran, Mayor, dated March 29, 2022

Comment Number	Comment	Response
MTC MAC #1	The Town Council echoes the comments provided by the PZC. The size and scale of the proposed redevelopment has the potential to significantly impact both the built and natural environment in addition to potential socioeconomic impacts. The Council supports the PZC's conclusion in that an EIE is needed, and that alternatives should be evaluated, such as reducing number of beds and increasing the parking ratio.	Comment noted for EIE and design development.
MTC MAC #2	The EIE should include an evaluation of the impacts of any mitigation measures that are proposed to minimize impacts of the development, particularly if construction of the connection from Route 275 to Bolton Road is being considered as a mitigation measure for anticipated traffic impacts.	Comment noted for EIE and design development. See Response PZC MAC #3.

The Department of Energy and Environmental Protection provided written comments from Linda Brunza, Environmental Analyst, dated March 22, 2022		
Comment Number	**Comment**	**Response**
DEEP MAC #1	Redevelopment plans could have the potential to increase impervious coverage and associated impacts of stormwater pollution on the aquatic life to downstream Bundy Brook. Stormwater best management practices (BMPs) targeted for the planned urban residential redevelopment should include disconnecting impervious surfaces from drainage to headwaters of Bundy Brook, education, and outreach programs regarding animal (pet) waste, proper use and management of solid waste dumpsters, and where practical, the treatment and infiltration of urban runoff from this redevelopment project. Metrics for pollution prevention and good housekeeping practices developed for the new residential complex should consider street and paved area sweeping, catch basin cleaning, and snow management. Where the redevelopment project has control of headwater riparian areas, natural woody vegetation planting enhancements with an activity exclusion buffer of 100 feet or more should be considered. The nearby state highways (Route 275 and Route 195) have management control by CTDOT and possible stormwater discharges through this redevelopment stormwater system should be coordinated for effective treatment of stormwater volume and quantity.	Best management practices (BMP) will be considered during design, including as they relate to property maintenance.

The Department of Energy and Environmental Protection provided written comments from Linda Brunza, Environmental Analyst, dated March 22, 2022		
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DEEP MAC #2	University personnel with the Natural Resources Conservation Academy renovated a paved driveway runoff stormwater retrofit project (a rain garden) on this site in 2016; it appears that functional water quality improvement practice would be removed with this redevelopment.	The University is aware of existing stormwater management efforts on-site and ensures any water quality measures previously designed and constructed are either replaced in-kind or improved upon with the redevelopment project.
DEEP MAC #3	The Sanctuary access (adjacent to the rear parking area) should be maintained or enhanced for continued public enjoyment and understanding (through interpretive stations) of the protected watershed resources of Tift Pond and associated diverse habitats. Where practical, the University redevelopment project for the Mansfield Apartments should fully support the management goals, public access and uses of the Moss Sanctuary.	Comment noted for design development.
DEEP MAC #4	The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Clean fill can be used on site or at appropriate off-site locations. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA.	Comment noted for the selected site contractor.
DEEP MAC #5	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. DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling.	Comment noted for the selected contractor and site development team.
DEEP MAC #6	If abatement is required for asbestos containing materials (ACM), these materials are regulated as a "special waste" in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these materials may only be disposed of at	Comment noted for the selected site contractor.

The Department of Energy and Environmental Protection provided written comments from Linda Brunza, Environmental Analyst, dated March 22, 2022		
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	facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities.	
DEEP MAC #7	Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs) or contaminated with lead-based paint, residues or materials that require special disposal. EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP.	Comment noted for the selected site contractor.
DEEP MAC #8	DEEP's Wildlife Division has no concerns or comments on the redevelopment in regard to Natural Diversity Database (NDDB) mapped species.	Comment noted.
DEEP MAC #9	The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and	Comment noted for EIE and design development.

The Department of Energy and Environmental Protection provided written comments from Linda Brunza, Environmental Analyst, dated March 22, 2022		
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	sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control.	
DEEP MAC #10	DEEP Bureau of Air Management typically recommends the use of newer off-road construction equipment and newer on-road vehicles that meet the latest EPA or California Air Resources Board (CARB). Alternatively, if newer equipment cannot be used, equipment with the best emission controls or retrofits should be used where feasible.	Comment noted for the site development team.
DEEP MAC #11	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. Use of posted signs indicating the three-minute idling limit is recommended.	Comment noted for the site development team.
DEEP MAC #12	Please contact the Land and Water Division for information regarding Flood Management Certification, which may be required for this location.	Comment noted for the site development team.

Members of the public provided written or verbal comments during a virtual scoping meeting held dated March 10, 2022		
Comment Number	**Comment**	**Response**
PC MAC #1	Comment from Mike Benevento, Mansfield CT - The purple wetlands areas [as seen in the public scoping meeting] are those wetlands soils per se or does that show the soil + the jurisdiction of the inland wetlands agency (i.e., +150 ft upland review). If the former, can you also show the upland review area on any subsequent materials?	The site is not subject to Inland Wetlands review. See Response PZC MAC #12.

Members of the public provided written or verbal comments during a virtual scoping meeting held dated March 10, 2022		
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PC MAC #2	Comment from Mike Benevento, Mansfield CT – A comment was made on the general importance and criticality of the biodiversity and NDDB, as well as water quality concerns in the area, particularly because surrounding neighbors rely on private wells.	See Response DEEP MAC #8.
PC MAC #3	Comment from an anonymous attendee - Of the 15 acres, what percent is currently impervious cover? Based on the goals stated, do you expect the percent impervious cover increase or decrease when project is finished?	The existing impervious cover on the site is approximately 30%. Pre-design plans identify approximately 40% impervious with the redevelopment. Any increase in impervious cover at the conclusion of the design phases will be appropriately mitigated.
PC MAC #4	Comment from an anonymous attendee - Can you provide more information on the EIE and what triggers this process?	Commentor was addressed during the Scoping Notice's public presentation.
PC MAC #5	Comment from Kenneth Feathers, Storrs CT - You indicate that there is no change use, yet the proposed bed count is almost 4 times the current bed count. It seems this is a significant change in density that could be construed a change in use.	The present use is student housing and this residential use is not proposed to change.
PC MAC #6	Comment from Kenneth Feathers, Storrs CT - In evaluation of the impact on sensitive species it would seem to be important to look at and inventory the species present in Moss Sanctuary, an adjacent parcel that might be subject to both runoff and increased recreational pressure due to the higher population living immediately adjacent.	See Response PZC MAC #10.
PC MAC #7	Comment from Kenneth Feathers, Storrs CT - In personal experience a typical off-campus 4-bedroom rental house may have 6 or more cars parked at it. How realistic is your parking allocation with 900 beds and only 450 parking spaces?	See Response PZC MAC #1. Resident student parking permits are distributed throughout campus and are not necessarily restricted to this site. Therefore, residents of the proposed development may be permitted to park elsewhere.