Instructions for Use:

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

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

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

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

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

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

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

Date: September 29, 2023
Name of Project/Action: Whitney House Demolition
Project Address(es): 1315 Storrs Road
Affected Municipalities: Mansfield
Sponsoring Agency(ies): The University of Connecticut

Agency Project Number, if applicable: Enter text.
Project Funding Source(s)/Program(s), if known: Enter text.

Identify the Environmental Classification Document (ECD) being used in this review:
☒ Generic, or ☐ Agency-Specific

☐ An environmental assessment or environmental impact statement is being prepared pursuant to NEPA, and shall be circulated in accordance with CEPA requirements.
☒ The proposed action requires a written review by the State Historic Preservation Office (SHPO) and/or Nation Tribal Historic Preservation Office (NATHPO). Include SHPO/NATHPO reviews as an attachment, or indicate the status of those reviews:

UConn met with the State Historic Preservation Office (SHPO) and Preservation Connecticut (PCT) about the proposed project, and pursuant to CGS § 22a-1 through 22a1-h RCSA § 22a-la-1 through 22a-la-12, each were notified of the extent and nature of any environmental effects of the proposed action and the comment period during the public scoping phase. UConn also submitted a Project Review Cover Form to SHPO in May 2023, prior to the Scoping period. (A copy is available at https://updc.uconn.edu/whitney-house.) UConn will continue to coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action.

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

Completed by: James Libby, AIA, LEED AP, Sr. Project Manager, University of Connecticut Office of University Planning, Design and Construction
Note that prior to commencing a CEPA review, Connecticut General Statutes (CGS) Section 16a-31 requires state agencies to review certain actions for their consistency with the policies of the State Plan of Conservation and Development (State C&D Plan). Completion of this ERC assumes the agency has determined this proposed action to be consistent with the State C&D Plan.
PART II – Detailed Project Information

Description of the Purpose & Need of the Proposed Action:

Vacated without a useful purpose since 2004 and irreparably damaged by fire, smoke, and water in January 2023, Whitney House is unsafe for occupancy and beyond reasonable repair. As such, the University notified the State Historic Preservation Office (SHPO) and Town of Mansfield regarding its need and intent to demolish the structure, and subsequently submitted a Project Review Cover Form to SHPO in May 2023. The purpose of the Proposed Action is to eliminate present hazards and liabilities associated with the existing structure and site.

Description of the Proposed Action:

The Proposed Action will include the planning, design, and decommissioning of the Whitney House building for demolition. Removal of the existing building will involve the decommissioning of existing utilities, remediation of any hazardous and/or regulated materials, and demolition of the building. Restoration of the existing site will include the infill of the basement, grading and reestablishing lawn and plantings, and restoring services and/or remediating soil as needed. As noted above in Part I, UConn will continue to coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) as alternatives are being considered.

Alternatives Considered:

The University considered several alternatives for addressing the stated purpose and need. These included the following alternatives: (1) No Action, (2) Repair and Restore Building, (3) Salvage and Relocate Building, and (4) Remove Building and Restore Site.

No Action - As part of this alternative, no action would be taken. Whitney House would remain an unsafe liability risk and would continue to deteriorate. Mold, mildew growth, and moisture damage would continue to accelerate.

Repair and Restore Building - As part of this alternative, damages to Whitney House would be repaired, and the building would be restored to its condition prior to the fire (to the extent practicable). Loose hazardous and regulated materials would create problematic construction conditions, and the existing structural damage would make areas challenging to restore. The extensive smoke damage may be beyond areas of obvious structural damage – expanding the scope of repairs and restoration work needed. Coordination would be required on mitigation measures due to the building being located in the UConn Historic District, and funding limitations would make timely repairs challenging.
Salvage and Relocate Building - As part of this alternative, the entire Whitney House structure would be salvaged and relocated to an alternative site off-campus. HAZMAT and chain of custody may make this alternative a liability for all parties involved, and the complete architectural salvage of the entire structure would be time-consuming and remediation intensive. Damage to the structure and location would limit the feasibility of relocating it, and it would require resolution of potential legal issues.

Remove Building and Restore Site (Proposed Action) – As part of this alternative, the Whitney House building would be demolished, the site would be restored, and any temporary impacts to the Great Lawn (e.g., site work and staging) would be restored to their previous condition. This alternative would be the timeliest means to mitigate the safety and other risks associated with the damaged structure, and it would involve the decommissioning of existing utilities, remediation of any hazardous and/or regulated materials, and demolition of the building. UConn will continue to coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action.

Public concerns or controversy associated with the proposed action:

Public comments included concerns related to the historic nature of the building (and its location in the UConn Historic District), potential health concerns related to asbestos exposure, and potential impacts to natural resources located near the project site.
**PART III – Site Characteristics** (Check all that apply)

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

**Locational Guide Map Criteria:**
http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cffe556a

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

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

<table>
<thead>
<tr>
<th>Required Factors for Consideration (Section 22a-1a-3 of the RCSA)</th>
<th>Agency’s Assessment and Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effect on water quality, including surface water and groundwater;</td>
<td>The Proposed Action will not result in any direct impacts to wetlands and watercourses. Stormwater management for the site has been considered in the context of the Campus Drainage Master Plan and will include best management practices to avoid direct, indirect, or cumulative impacts to water quality.</td>
</tr>
<tr>
<td>Effect on a public water supply system;</td>
<td>No direct, indirect, or cumulative adverse impacts on campus water supply capacity are anticipated. Additionally, no direct or indirect impacts to quality or quantity of any other public water supply is anticipated.</td>
</tr>
</tbody>
</table>
| Effect on flooding, in-stream flows, erosion or sedimentation; | **Flooding**
No negative impacts are anticipated. The project is not located within Connecticut’s coastal boundary, nor is the project within mapped Federal Emergency Management Agency (FEMA) floodplain. Stormwater management will be consistent with the campus-wide Drainage Master Plan, so that no increase to downstream flooding in Mirror Lake/Roberts Brook will occur.

**In-stream Flows**
No direct, indirect, or cumulative impacts to flows in the Roberts Brook watershed are anticipated.

**Erosion or Sedimentation**
No direct, indirect, or cumulative impacts are anticipated from the Whitney House demolition. All work during demolition will be consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended. |
<p>| Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site or its surroundings; A. Alteration of an historic building, district, structure, object, or its setting; OR B. Disruption of an archeological or sacred site; | UConn will continue to coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action. |
| Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of | Prior to the public scoping meeting, a Natural Diversity Data Base (NDDB) request for the Proposed Action area was submitted by UConn on Friday, July 21, 2023. UConn received a determination from the Connecticut Department of Energy and Environmental Protection (DEEP) on July 24, 2023 of no anticipated negative |</p>
<table>
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<th>any resident or migratory fish or wildlife species;</th>
<th>impacts to State-listed species resulting the proposed project. As a result, no direct, indirect or cumulative impacts to natural communities, critical species or their habitat or movement of any species.</th>
</tr>
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<tbody>
<tr>
<td>Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment;</td>
<td>Demolition of Whitney House will not result in the introduction of any new such materials on campus. Prior to undertaking any regulated demolition of the building, UConn will thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos. UConn has already conducted a preliminary asbestos analysis of the building debris. Existing protocols such as those established by the UConn Division of University Safety, Environmental Health and Safety will ensure that no unreasonable adverse effects are anticipated to result from the Proposed Action. Best management practices will be in place during the construction phase to avoid any adverse effects to the environment.</td>
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<td></td>
<td>Contractors will be required to comply with requirements for construction-related hazardous materials and solid waste in <a href="#">UConn’s Contractor EHS Manual: Environmental, Health, and Safety (EHS) Requirements for Construction, Service, and Maintenance Contractors</a>, including reference to such requirements in contract documents. Construction-related solid waste will be handled and disposed of in a manner that meets current regulations and University standards. Construction and demolition debris will be managed in accordance with applicable state and federal regulations and the University’s contractor policies. Hazardous or regulated materials or subsurface contamination encountered during construction will be characterized and disposed of in accordance with applicable state and federal regulations.</td>
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<td></td>
<td>In keeping with UConn’s <a href="#">Contractor EHS Manual: Environmental, Health, and Safety (EHS) Requirements for Construction, Service, and Maintenance Contractors and PCB Management Plan</a>, contractors will also be required to remove and dispose of any PCB-containing materials (confirmed or presumed) in accordance with all applicable Federal and State statutes/regulations and any project specific specifications/remedial plans. Contractors shall not perform sampling of any building materials for PCB content unless specifically authorized to do so by the UConn Project Representative in consultation with UConn EHS. And as renovation and demolition projects that may impact caulks, glazing, and other joint sealants in a building constructed or renovated between 1950 and 1979 are planned, sampling and abatement strategies will be based upon the types and quantities of impacted building materials, the age of the building or history of renovations, as well as other factors.</td>
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<td>Effect</td>
<td>Description</td>
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<td>as scope and magnitude of the renovation or demolition. EHS must be consulted in connection with any such project prior to any proposed disturbance or sampling of caulk, glazing or sealant that could contain PCBs.</td>
<td></td>
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<td>Substantial aesthetic or visual effects;</td>
<td>The Proposed Action would involve the removal of a historic building that may affect the aesthetic or visual qualities of the surrounding area. However, as noted above, UConn will continue to coordinate with the State Historic Preservation Office (SHPO) regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action. Additionally, any temporary impacts to the Great Lawn (e.g., site work and staging) would be restored to their previous condition.</td>
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| Inconsistency with: (A) the policies of the State C&D Plan, developed in accordance with section 16a-30 of the CGS; (B) other relevant state agency plans; and (C) applicable regional or municipal land use plans; | The Proposed Action does not involve adaptive reuse, redevelopment, or preservation of Whitney House and is therefore not consistent with:  
- Growth Management Principle #1 in the State C&D Plan.  
- The goal in the Town of Mansfield C&D Plan to preserve historic resources. |
| Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a- 1b(c) and 8-37t of the CGS require additional analysis; | The Proposed Action will not result in any disruption or division of an established community or impact on housing. As noted in the section above, the Proposed Action is not consistent with the Town of Mansfield C&D Plan. |
| Displacement or addition of substantial numbers of people; | No direct, indirect, or cumulative impacts are anticipated as the site was not used (and is not proposed to be used) for housing. |
| Substantial increase in congestion (traffic, recreational, other); | The site does not currently generate traffic, and upon demolition no direct, indirect, or cumulative impacts are anticipated. |
| A substantial increase in the type or rate of energy use as a direct or indirect result of the action; | Non-substantial increase in energy use during the demolition-period is anticipated due to the use of machinery. However, the Proposed Action will not result in a long-term increase in energy use. |
| The creation of a hazard to human health or safety; | The Proposed Action aims to mitigate the safety and other risks associated with the damaged structure. As noted above, mitigation measures will be in place to reduce risks to human health and safety during the proposed demolition and remediation/restoration of the site. |
| Effect on air quality; | No new mobile source air emissions are proposed, and no new significant station sources of emissions are proposed. The project |
will be in compliance with the campus-wide Title V permit for all sources of air pollutants. Construction activities may result in temporary, short-term impacts to ambient air quality due to direct emissions from demolition equipment and fugitive dust.

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<tr>
<th>Effect on ambient noise levels;</th>
<th>No direct, indirect, or cumulative impacts to ambient noise levels from the Proposed Action. Heavy machinery and equipment associated with the demolition may result in temporary increases in noise levels in the immediate area of the site.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effect on existing land resources and landscapes, including coastal and inland wetlands;</td>
<td>The Proposed Action involves reestablishing lawn and plantings and restoring the landscape. The project site is not located within Connecticut’s coastal boundary. The Proposed Action will not result in any direct impacts to inland wetlands. Stormwater management for the site has been considered in the context of the Campus Drainage Master Plan and will include best management practices to avoid direct, indirect, or cumulative impacts to water quality.</td>
</tr>
<tr>
<td>Effect on agricultural resources;</td>
<td>There are no farmland soils in the project area. No direct, indirect, or cumulative adverse effects to agricultural resources.</td>
</tr>
<tr>
<td>Adequacy of existing or proposed utilities and infrastructure;</td>
<td>The Proposed Action does not involve new or proposed utilities or infrastructure.</td>
</tr>
<tr>
<td>Effect on greenhouse gas emissions as a direct or indirect result of the action;</td>
<td>No long-term, energy-related greenhouse gas (GHG) emissions are associated with the Proposed Action. Heavy machinery and equipment associated with the demolition may result in temporary increases in GHG.</td>
</tr>
<tr>
<td>Effect of a changing climate on the action, including any resiliency measures incorporated into the action;</td>
<td>The Proposed Action will not be substantially impacted by a changing climate. The Proposed Action involves reestablishing lawn and plantings, which will reduce the amount of impermeable surfaces on campus.</td>
</tr>
<tr>
<td>Any other substantial effects on natural, cultural, recreational, or scenic resources.</td>
<td>The Proposed Action will result in the loss of a historic building within the UConn Historic District. As noted above, UConn will continue to coordinate with SHPO regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action.</td>
</tr>
<tr>
<td>Cumulative effects.</td>
<td>Potential cumulative effects associated with the Proposed Action are related to the historic nature of the Whitney House structure and its location in the UConn Historic District. SHPO has indicated no objection to the proposed demolition of Whitney House (see Attachment B), and UConn will continue to coordinate with SHPO regarding any potential mitigation measures (e.g., commemorating the building history and its physical footprint) related to the Proposed Action.</td>
</tr>
</tbody>
</table>

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

*State of Connecticut, Environmental Review Checklist*
Anticipated permits, approvals, and/or certifications include the following:

- **Town of Mansfield** – Building demolition permit

Note: Prior to submitting a building demolition permit, a letter must be submitted to the Town stating that asbestos has been identified and abated. If asbestos-containing materials cannot be abated, CT Department of Public Health approval would be required.

### PART VI – Sponsoring Agency Comments and Recommendations

UConn held a scoping meeting on July 25, 2023. A copy of the scoping presentation can be found in Attachment A. A recording of the meeting can be viewed at [this link](#).

Based on UConn’s environmental assessment of the proposed project, which includes a review of the comments received, it has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA.

### PART VII - Public Comments and Sponsoring Agency Responses:

During the scoping period, comments were received from:

- Linda Brunza (Environmental Analyst, Connecticut Department of Energy and Environmental Protection)
- Jonathan Kinney (State Historic Preservation Officer, Connecticut Department of Economic and Community Development State Historic Preservation Office)
- Mansfield Town Council
- Mansfield Planning and Zoning Commission
- Gwen George-Bruno (President, Windham Preservation Inc., 9 Weir Court, Windham, CT)
- Bruce Clouette (483 Woodland Road, Mansfield, CT)
- Mike Vrabel (Casella Waste Systems, Willimantic, CT)
- Quentin Kessel (97 Codfish Falls Road, Storrs, CT)
- Gregory Cichowski (53 Old Turnpike Road, Storrs, CT)
- Gail Bruhn (Summit Road, Storrs, CT)
- Lionel Shapiro (UConn Philosophy)
- Laura Crow (88 Hillyndale Road, Storrs, CT)
- Susan Cyr (affiliation and/or address not provided)
- David Landry (Mansfield resident)
- Xinyu Zhao (Associate Professor, Director of Graduate Studies School of Engineering at UConn)
- Bob Shabot (Vice President, Willington Historical Society)
- Lynn Putnam Kask (3 Agronomy Road, Storrs, CT)
- Alison Hilding (17 Southwood Road, Storrs, CT)
- Brian Bartizek (Resident, Eastern CT)
- Stephen C Marshall (1346 South Street, Coventry CT)
• David A. Schump (affiliation and/or address not provided)
• Victoria Mitchell (affiliation and/or address not provided)
• Michael Emmons (UConn History MA, 2004)
• Ann Galonska (Museum Director, Mansfield Historical Society, 47 Shanda Lane, Tolland, CT)

Copies of the correspondence and a summary of comments and responses are included in Attachment B.