# **ENVIRONMENTAL**ASSESSMENT





### **DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION**

# **HOME INVESTMENT PARTNERSHIP PROGRAM 2019-2020**

Office of Central Grants Administration

PROJEC	T NAME:	Clover Gardens	
PROJEC	T LOCATIONS:	834, 842-842H, 846, 852-854 Asylum and Hartford, CT	l 1 Huntington Streets
PROJEC	T SPONSOR:	Clover Gardens Limited Partnership 255 Homestead Avenue Hartford, Ct 06112	
PROJEC	T CONTACT:	Contact - Brad Schide - 860-463-0193	
ESTIMA	TED TOTAL PROJECT COST:	Construction Funding sources are estimated Private Construction Loan State of CT Dept of Housing Funding Low Income Housing Tax Credit/ HTC Equitarity Home Home Subsidy	\$ 6,200,000 \$ 4,300,000
		Permanent Funding* sources are estimated State of CT Dept of Housing 1st mortgage City of Hartford HOME Funds Low Income Housing Tax Credits Other State/ Federal Housing Tax Credits State of CT Historic Tax Credits Total	funding \$ 5,500,000 \$ 400,000 \$ 3,309,207
RESPON	NSIBLE ENTITY:	City of Hartford Management and Budget Department, Of 550 Main Street, Room 302, Hartford, CT	
CERTIF	YING OFFICER:	Lionel Rigler, Environmental Review Proje	ect Manager (860) 757-9277
CONDIT	TIONS FOR APPROVAL:	List all mitigation measures adopted by the or minimize adverse environmental impaincluded in project contracts or other releves [24 CFR 58.40(d), 40 CFR 1505.2(c)]	acts. These conditions must be
ENVIRO	NMENTAL FINDING: [58.40(g)]		
	Categorical exclusion is made in ac	cordance with § 50.20.	
$\overline{\checkmark}$	Environmental Assessment and a F	inding of No Significant Impact (FONSI) is made	e in accordance with § 50.33.
	Environmental Assessment and a F is required in accordance with §§ 5	Finding of Significant Impact is made, and an En 50.33(d) and 50.41.	vironmental Impact Statement
THIS E	NVIRONMENTAL <b>A</b> SSESSMENT WAS		1
Name	: Lionel Rigler	Signatur	e: Lionsl Rigler
Title:	Environmental Review Project Ma Department of Management and	nager City of Hartford <b>Date:</b> A Budget Department	e: Lionel Rigler Jugust 14, 2020

DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

**HOME Investment Partnership Program** 2019-2020

**APPROVED BY:** 

Name: Joan Barere

Title: Director, Office of Central Grants

Signature:

ate: August 14, 2020

### PART ONE: PROJECT DESCRIPTION AND ACTIVITIES

STATEMENT OF PURPOSE AND NEED FOR THE PROPOSAL: [40 CFR 1508.9(B)]

Clover Gardens Limited Partnership is developing 32 units of housing in four buildings at the addresses known as 834, 846, 852 Asylum Avenue and 1 Huntington Street in Hartford's Asylum Hill neighborhood. The project is named Clover Gardens and all 4 buildings are listed on the National Register of Historic Places. The structures are currently vacant and underutilized.

DESCRIPTION OF THE PROPOSAL: INCLUDE ALL CONTEMPLATED ACTIONS THAT ARE EITHER GEOGRAPHICALLY OR FUNCTIONALLY A COMPOSITE PART OF THE PROJECT, REGARDLESS OF THE SOURCE OF FUNDING. [24 CFR 58.32, 40 CFR 1508.25]

The 32 units in four buildings are comprised of eight (8) efficiency, nineteen (19) one-bedroom, three (3) two-bedroom and two (2) three-bedroom units and will serve families and individuals between 30% and 80% of the median. The substantial rehabilitation will include new electrical, HVAC, plumbing systems, re-pointing of masonry, roofs, porches, new kitchens and baths and new landscaping. There are four fully handicapped units in the project.

Financing for the \$13 million project will come from the State Department of Housing, Connecticut Housing Finance Authority, City of Hartford HOME funds, State and Federal historic and housing Tax Credit equity. Funding approvals are in place.

Enterprise Builders, Inc. has been selected as the general contractor and the project architect is Crosskey Architects. Construction is expected to commence in late summer and take 13 months to complete. Full occupancy is expected by the end of 2021.

EXISTING CONDITIONS AND TRENDS: DESCRIBE THE EXISTING CONDITIONS OF THE PROJECT AREA AND ITS SURROUNDINGS, AND TRENDS LIKELY TO CONTINUE IN THE ABSENCE OF THE PROJECT. [24 CFR 58.40(a)]

Current Conditions of the buildings and properties

# CITY OF HARTFORD DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION HOME Investment Partnership Program 2019-2020

### **PART TWO: ENVIRONMENTAL REVIEW**

### A) STATUTORY CHECKLIST

Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
							For each listed statute, executive order or regulation, record the determinations made. Note reviews and consultations completed as well as any applicable permits or approvals obtained. Attach evidence that all required actions have been taken.
Historic Properties [36 CFR 800]						<b>✓</b>	Due to the age of the buildings the Project Sponsor sent a Project Notification Form was sent to the State Historic Preservation Office (SHPO). SHPO replied "regarding the Aaron C. Goodman House, 834 Asylum Avenue, The applicant shall demonstrate compliance with the following condition(s) prior to filing the state Part 3 application, Request for Preliminary Certification and Reservation of Tax Credits:  1. Repointing mortar must match the color, texture, strength, joint width and joint profile of the existing historic masonry. Specifications and repointing samples should be reviewed and approved by the State Historic Preservation Office before proceeding with this work. Good quality overall and close-up color photographs of the masonry both <b>before</b> and after repointing must be submitted with the
							Request for Certification of Completed Work.  2. Luxury vinyl tile is not an appropriate substitute for hardwood flooring in a high- style residential structure. The SHPO and NPS will expect that the hardwood floors will be refurbished where possible. If the floors are beyond repair, they should be replaced in-kind or with a historically appropriate material.  3. The visual impact of adding storm windows must be kept to a minimum. The division of the storm windows, if any, must align with the meeting rail of the historic window, the frames must not be excessively bulky, and the color of the storm windows must match that of the window sash or frame."  (SHPO, February 4 2020)

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Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
Floodplain Management [24CFR55, EO 11988]	✓						Project sites are not located within the 100-year flood zone and does not require flood insurance. (indicated on Property Detail Map included in Environmental Review Record)
Wetlands Protection [EO 11990]	✓						Project not in wetland areas defined by City 1987 Designated Inlands, Wetlands, and Watercourses Map. (included in Environmental Review Record)
Coastal Zone Management [Sec. 307(c), (d)]	<b>✓</b>						Hartford is not located in a coastal zone. CT Map. (included in Environmental Review Record)
Water Quality– Aquifers [40 CFR 149]	✓						Hartford is not located on a sole source aquifer. State of CT Aquifer Map. (included in Environmental Review Record)
Endangered Species [50 CFR 402]	<b>✓</b>						None in area, per Natural Diversity Database Digital Data on attached Property Detail Map.  www.hud.gov/offices/cpd/environment/review/endange redspecies.cfm
Wild & Scenic Rivers [Sections 7 (b), (c)]	<b>✓</b>						There are no designated wild and scenic rivers within the City of Hartford. (HUD Tidbits of the Environment #06-017 dated 10/6/05)
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	<b>✓</b>						No industrial operation or power station is located in the project area. The project will also not create a large number of dwelling units that might generate a high volume of vehicular traffic i.e. 1,000 or more vehicles. (http://www.hud.gov/offices/cpd/energyenviron/environment/compliance/forms/trngmanual/chapt2compliance.cfm)  Demolition and construction activities will include fuel burning equipment, as well as heating, ventilation and air conditioning equipment associated with building operations once construction has been completed. The air emissions from this equipment are anticipated to be minor and will not significantly affect local or regional air quality.

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Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
							Potential construction air quality impacts can occur due to the use of diesel-powered construction vehicles. Diesel air emissions include carbon monoxide, hydrocarbons, nitrogen oxides and particulate matter (PM10). Emissions from construction equipment are anticipated to be significantly less than the total emissions from other industrial and transportation sources.
Farmlands Protection [7 CFR 658]	<b>✓</b>						Project is on previously developed land, and will have no impact on prime or unique farmland or other farmland of state or local importance. (indicated on Property Detail Map included in Environmental Review Record)
Manmade Hazards Thermal/Explosive [24 CFR 51 C]	<b>✓</b>						Project is an Acceptable Safe Distance from thermal/explosive hazards nor project will expose neither people nor buildings to such hazards. (Phase I Environmental Site Assessment, JHM Group and Freeman Group, November, 2016.)
Noise [24 CFR 51 B]	<b>√</b>						The noise to be generated by construction equipment between 7AM-6PM on weekdays and Saturdays is considered exempt from ordinance. (Hartford Municipal Code, Ch. 23, Noise, Sec. 23-3(e)) The project site is also fully surrounded by existing urban and commercial uses. (area knowledge)
Explosive and Flammable Operations [24 CFR 51C]	<b>√</b>						The Site is not within the immediate vicinity of hazardous industrial operations handling fuel or chemicals of an explosive or flammable nature. (Phase I Environmental Site Assessment, 834, 842-842H, 846, & 852-854 Asylum Avenue and 1 Huntington Street Hartford, Connecticut June 24, 2019; GEI Consultants)
Airport Clear Zones [24 CFR 51 D]	<b>√</b>						There are no commercial service airports in the area as designated by National Plan of Integrated Airport Systems, prepared by the FAA. (revised HUD Tidbit #06-021 dated 7/21/06)

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Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
Toxic Sites [24 CFR 58.5(i)(2)] and Remediation Action Plan						✓	GEI July 17 2020 Report - Clover Gardens - Environmental Assessment - Summary of Environmental Issues; 834-854 Asylum Avenue & 1 Huntington Street, Hartford, Connecticut Five adjoining properties (Areas of Concern 1 – 5)
for all five (5) properties							Summary of issues common to all five properties (Areas of Concern 1 - 5):
							Paint on the buildings contained lead and has chipped off onto the soils adjacent to the buildings. Likewise, certain window caulking may have contained polychlorinated biphenyls (PCBs) and might have impacted soils around the buildings. Finally, past use of pesticides (chlordane in particular) around the building foundations may have left a residual in soils. Testing was performed to evaluate the condition of the soils in comparison to residential standards and the following was concluded:
							Constituents of Concern (COCs):
							PCBs: None were detected and no remedial actions are necessary.
							Lead: Certain soils contained concentrations of lead and require removal of those soils to 12 or 18 inches, depending on the location.
							Chlordane: Certain low concentration residuals remain in soils and, at one location, requires removal of soils to 18 inches.
							After removal of the impacted soils, clean soils will be used to replace those removed.  Three, unused underground fuel oil tanks require removal. Each of the tanks was evaluated and soils around two of the tanks requires removal of a small quantity of impacted soils. COCs are petroleum by CT ETPH method and volatile organic compounds (VOCs) by Method 8260.

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		When the remediation is completed, the remaining soils on each of the five properties will meet residential standards and not require any special management.
		For each of the properties, the specific actions that will be taken are summarized below, consistent with the general summary above. The work completed has been fully documented by GEI Consultants, Inc. (GEI) in the three reports identified below (The Environmental Reports):
		<ul> <li>March 26, 2020, Mitigation Cost Estimate – summary report;</li> </ul>
		<ul> <li>April 10, 2020, Mitigation Cost Estimate Refinement</li> <li>Summary report; and</li> </ul>
		<ul> <li>June 3, 2020, Final Mitigation Cost Estimate Refinement – summary report.</li> </ul>
		Area of Concern #1: 1 Huntington Street:
		The work on this parcel consists of the following:
		<ul> <li>Removal of 2,000-gallon underground fuel oil tank and a small quantity of soils around the tank;</li> <li>Excavation and removal of certain lead-impacted soils to a depth of 12 or 18 inches, depending on location; and</li> <li>Replacement of the soils to the existing grade.</li> </ul>
		The site investigation and remedial planning work is fully documented in the Environmental Reports.
		2,000-gallon out of service fuel oil tank: This 2,000-gallon fuel oil tank is identified as AOC-A on the attached Figure 1 and was removed from service in 1998 or 2011. This tank was the subject of recent environmental investigations as described below.
		Four samples were collected around the fuel oil tank. At a depth of about seven feet, field evidence of petroleum contamination was observed. However, only two of the four samples were reported to contain petroleum and at relatively modest levels (above the residential standards, but below the industrial/commercial standards). The environmental data are illustrated on the attached Figure 4. The cost of removal and disposal of 14 cubic yards (CY) (estimated 22 tons) of petroleum-contaminated soils are included in the overall remediation cost estimate.
		Conclusion:  A release of petroleum occurred from an unused underground storage tank (UST) at 1 Huntington Street. The release is fully characterized and requires the removal of a small amount of soil during the UST removal. A release of lead has occurred to soils from lead paint chipping off the building. Removal of soils to 12 or 18 inches below grade, depending on location, is required to achieve residential standards.

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Remediation Plan: Assumptions
The release of petroleum around the tank is minor and it is assumed that the tank and the affected soils may be removed to meet the residential and pollutant mobility standards. The lead contamination has been fully characterized and may be removed to meet the residential standards.
Remediation Tasks Excavate a total of 63.5 cubic yards (estimated 101.6 tons) of soil for off-site disposal. Collect confirmation soil samples in the UST excavation. Backfill with clean soil.
Removal and proper disposal of a 2,000-gallon fuel oil tank at 1 Huntington Street and certain petroleum contaminated soils. Approximately 10 CY (16 tons) of petroleum impacted soils will be removed and comingled with the lead impacted soil stockpile. The combined volume of the tank and petroleum soils removed is about 20 CY. Place 10 CY of processed stone in the completed excavation to stabilize it until the general contractor can complete backfilling.
Area of Concern #2: 834 Asylum Street: The work on this parcel consists of the following: Remove 1,000-gallon fuel oil UST and a small quantity of soils. Replacement of the soils to the existing grade.
This 1,000-gallon fuel oil tank is identified as AOC-C on the attached figure 1 and was removed from service in 1990. This tank was the subject of previous environmental investigations as described below. As documented in a June 1, 2017 (Corrected January 16, 2020) Limited Phase II Subsurface Investigation Report, prepared by AEGIS, Inc., two soil samples collected from six to eight feet below grade contained ETPH concentrations of 170 and 940 mg/kg petroleum as compared to the residential DEC of 500 mg/kg. The cost of removal and disposal of 10 cubic yards (CY) (estimated 16 tons) of petroleum-contaminated soils are included in the overall remediation cost estimate.
Conclusion:  A release of petroleum occurred from an unused UST at 834 Asylum Street. The release is fully characterized and requires the removal of a small amount of soil during the UST removal.
Remediation Plan:  Assumptions The release of petroleum around the tank is minor and it is assumed that the tank and the affected soils may be removed to meet the residential and pollutant mobility standards. The lead contamination has been fully characterized and may be removed to meet the residential standards.

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	Remediation Tasks Removal and proper disposal of a 1,000-gallon fuel oil tank at 834 Asylum Avenue and certain petroleum contaminated soils. Approximately 10 CY (16 tons) of petroleum impacted soils will be removed and comingled with the lead impacted soil stockpile. The combined volume of the tank and petroleum soils removed is about 15 CY. Place 10 CY of processed stone in the completed excavation to stabilize it until the general contractor can complete backfilling.
	Area of Concern #3: 842 Asylum Avenue: The work on this parcel consists of the following:  No action is required on this parcel.
	<b>Conclusion:</b> No environmental impacts have been identified that require any further investigation or remediation.
	Area of Concern #4: 846 Asylum Avenue:
	The work on this parcel consists of the following:  Excavation and removal of certain lead-impacted soils to a depth of 12 or 18 inches, depending on location; and Replacement of the soils to the existing grade.
	The site investigation and remedial planning work is fully documented in the Environmental Reports.
	Conclusion:  A release of lead has occurred to soils from lead paint chipping off the building. Removal of soils to 12 or 18 inches below grade, depending on location, is required to achieve residential standards.
	Remediation Plan: Assumptions The lead contamination has been fully characterized and may be removed to meet the residential standards.
	Remediation Tasks Excavate a total of 45.5 cubic yards (estimated 72.8 tons) of soil for off-site disposal. Backfill with clean soil.
	<ul> <li>Area of Concern #5: 852-854 Asylum Avenue: The work on this parcel consists of the following: <ul> <li>Excavation and removal of certain chlordane and lead-impacted soils to a depth of 18 inches;</li> <li>Remove 1,000-gallon previously abandoned in place fuel oil UST; and</li> <li>Replacement of the soils to the existing grade.</li> </ul> </li> </ul>
	This 1,000-gallon fuel oil tank is identified as AOC-D on the attached figure 1 and was abandoned in place in 1993 by cleaning it and filling it with sand. Previous soil sampling on each side of the tank by Aegis Inc. in 2017 did not indicate any environmental contamination. This tank will

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			nevertheless be removed so that it does not physically interfere with any planned construction activities in that area.  The site investigation and remedial planning work is fully documented in the Environmental Reports.  Conclusions:  A release of lead has occurred to soils from lead paint chipping off the building.  Residual chlordane remains in soils as a result of historical spraying for insects. Removal of soils to a depth of 18 inches below grade in one location is required to achieve residential standards.  Removal of the previously abandoned in place fuel tank will be performed in order to remove it as a potential obstruction to the planned renovations.  Remediation Plan:  Assumptions  The lead and chlordane contamination has been fully characterized and may be removed to meet the residential
			standards.  No contaminated soil is associated with the abandoned fuel oil tank.  Remediation Tasks  Excavate a total of 8 cubic yards (estimated 12.8 tons) of soil for off-site disposal. Backfill with clean soil.
			Remove the fuel oil tank and dispose of it as scrap metal.  GEI July 17 2020 Report - Clover Gardens - Environmental
			Assessment – Summary of Environmental Issues; 834-854 Asylum Avenue & 1 Huntington Street, Hartford, Connecticut Five adjoining properties (Areas of Concern 1 – 5)
Environmental Justice [EO 12898]	<b>✓</b>		This project will create 32 housing units and will serve families and individuals between 30% and 80% of the median. and will beneficially impact EJ communities by providing quality affordable housing to low-income residents. (Property description included in Environmental Review Record)
			This does not have the potential for new or continued disproportionately high and adverse human health and environmental effects on minority or low-income populations, and is not likely to raise environmental justice issues.
Flood Insurance - 58.6(a)	<b>√</b>		Project site is not located within the 100- or 500-year flood zone and does not require flood insurance. (See Property Detail Map included in Environmental Review Record)
Airport Clear Zone Notification - 58.6(c)	<b>✓</b>		Project is not located within 2500 feet of runway of a designated FAA facility. (revised HUD Tidbit #06-021, dated 7/21/06)
Coastal Barriers - 58.6(b)	✓		Hartford is not located in a coastal zone. (CT map included in Environmental Review Record)

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Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
Water Quality	<b>✓</b>						The CT Water Quality Classifications Map for Hartford, Connecticut, delineates the Site location within a Class GB quality (degraded) and not considered suitable for human consumption without the need for treatment. Based on topographic features, the depth to the overburden water table may range between 10 to 15 feet below surface grade; with a groundwater flow inferred to the north/northwest. A competent groundwater table was not encountered in the deeper test borings placed at the property on May 24, 2017. (DEEP, Water Quality Standards)  The project site is served by municipal water and sewer through the Metropolitan District Commission. (indicated on Property Detail Map included in Environmental Review Record)
Solid Waste Disposal	<b>✓</b>						The majority of families moving into the proposed housing units are expected to relocate from other housing within the City of Hartford; therefore the increased demand on city-wide solid waste disposal and recycling is not expected to significant. Trash collection and recycling for the proposed redevelopment will be provided by the City of Hartford Sanitation Division.
Fish and Wildlife	<b>✓</b>						Project site occupies land already developed for residential purposes. No endangered species in area, as per Natural Diversity Database Digital Data. (indicated on Property Detail Map included in Environmental Review Record)
Building permits				✓			Must be obtained prior to start of work.  (http://www.hartford.gov/licenses-and-inspections/building-and-trades/693-building-permit-application-instructions)
Asbestos Abatement						<b>√</b>	Asbestos containing materials and remediation steps to address them are discussed in detail below in the Hazards and Nuisances section. Reports are contained in Eagle Environmental, Inc. Clover Gardens, Environmental Assessment – Summary of Hazardous Building Materials for each location: June 2020
LBP Abatement						✓	846 Asylum and 852-854 Asylum Street  Lead: Certain soils contained concentrations of lead and require removal of those soils to 12 or 18 inches, depending on the location, is required to achieve residential standards.  Conclusion: A release of lead has occurred to soils from lead paint chipping off the buildings.

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		Remediation Plan: Assumptions - The lead contamination has been fully characterized and may be removed to meet the residential standards.
		Remediation Tasks - Excavate a total of 53.5 cubic yards (estimated 85.6 tons) of soil for off-site disposal. Backfill with clean soil.
		Additional discussion of LBP  GEI July 17 2020 Report - Clover Gardens - Environmental Assessment - Summary of Environmental Issues; 834-854 Asylum Avenue & 1 Huntington Street, Hartford, Connecticut Five adjoining properties (Areas of Concern 1 – 5)

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[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;	(4) - Requ	tentially adverse; quires mitigation; quires project modification						
LAND DEVELOPMENT	CODE	Source or Documentation						
Conformance with Comprehensive Plans and Zoning	2	<u>Planning and Zoning Review</u> — On May 3 2018 the City's Planning and Zoning Commission granted an application for the Planned Residential Development consisting of properties at 1 Huntington St/ 834, 842, 846 and 852 Asylum Streets. All the parcels are zoned MX-1, Multi-Use Mix Zoning District. The use of multi-unit residential is a permitted use in this zoning district and the zoning encourages a mix of compatible office and residential uses with a lower scaled building types, in which rehabilitating these historic homes on site, will encourage.						
Compatibility and Urban Impact	2	See above						
Slope	1	The property is relatively level at street grade, with a slight downward slope towards the north. Based on the U.S. Geological Survey Topographic map for the Hartford North Quadrangle, the surface elevation at the Site is approximately 89 feet above the North American Vertical Datum of 1988.  Phase I Environmental Site Assessment, 834, 842-842H, 846, & 852-854 Asylum Avenue and 1 Huntington Street Hartford, Connecticut June 24, 2019; GEI Consultants)						
Erosion	1	Construction activities shall be consistent with the Connecticut General Permit for the Discharge of Stormwater and Dewater Wastewater Associated with Construction Activities and will implement appropriate erosion and sediment controls. (www.cicacenter.org/pdf/ctpermit.pdf)						
Soil Suitability	1	The Site is located in the south-central section of the Hartford North Quadrangle (7.5-minute series), which is located in central Connecticut. The current GIS data						

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Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;	<ul><li>(3) - Potentially adverse;</li><li>(4) - Requires mitigation;</li><li>(5) - Requires project modification</li></ul>		
		delineates the bedrock geology for the Site and the surrounding area as Portland Arkose of the Newark Terrane/ Hartford and Pomperaug Mesozoic Basins. This sedimentary rock is defined as reddish- brown Arkose (brownstone). Bedrock was not encountered during the subsurface investigation conducted on May 24, 2017.	
		The surficial materials beneath the subject parcels are identified as glacial lake bottom deposits of the dammed Glacial Lake Hitchcock, which consist of fines of the silt and clay fractions in glacial sediments. These materials were verified through the core samples obtained from test probes, which were driven to maximum depths between 5 and 12 feet below surface grade.	
		According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS). the Site is primarily mapped as the Urban Land.	
		Phase I Environmental Site Assessment, 834, 842-842H, 846, & 852-854 Asylum Avenue and 1 Huntington Street Hartford, Connecticut June 24, 2019; GEI Consultants.Page 5)	

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# Hazards and Nuisances including Site Safety

In addition to Toxic Sites [24 CFR 58.5(i)(2)] issues discussed above

Eagle Environmental, Inc. Clover Gardens, Environmental Assessment – Summary of Hazardous Building Materials for each location: June 2020

### 4 1 Huntington Street

### Contaminant of Concern #1: Asbestos-Containing Materials (ACM)

The building materials listed below were found to be ACM: Window frame caulk, Cementitious roof shingle **and** Residual insulation on hot water tank Light grey roof flashing cement; Grey/black flashing cement at skylight; Grey flashing cement at skylight; **and** White caulk at window skylight.

### Remediation Plan

The identified ACM's will be removed by a State of Connecticut licensed Asbestos Contractor prior to renovation activities. The work will be monitored by a State of Connecticut licensed Asbestos Project Monitor. Re-occupancy air clearance sampling shall be performed within each interior work area follow abatement activities. Waste shipment records will be obtained from the Asbestos Contractor at the completion of the work.

### Contaminant of Concern #2: Lead-Based Paint

The high levels of lead were primarily identified on metal radiators, limited door and window systems and limited plaster walls.; and in the kitchen and bathrooms on the second and third floors and on the exteriors.

### Remediation Plan

The identified lead-based paint will be abated by a State of Connecticut licensed Lead Abatement Contractor in compliance with the State of Connecticut Department of Public Health Lead Poisoning Prevention and Control Regulations 19a-111-1 through 19a-111-1. Lead-based paint will be abated by an approved abatement method including paint removal, component removal, enclosure or encapsulation. Lead-based paint dust clearance sampling shall be performed in each room where lead-based paint abatement is performed. Lead-based paint that is intact or is abated by liquid encapsulation or enclosure shall be placed on a lead-based paint management plan for continued surveillance.

<u>Contaminant of Concern #4: Polychlorinated Biphenyls (PCB) in Building Materials and Electrical Equipment</u>

### Remediation Plan

The PCB-containing caulk will be removed for proper disposal prior to renovation activities. The caulk is also asbestos-containing. Waste shipment records certifying proper disposal of the ACM/PCB caulk shall be obtained following abatement/remediation activities.

### 834 Asylum Avenue

### Contaminant of Concern #1: Asbestos-Containing Materials (ACM)

The building materials listed below was found to be ACM: Residual pipe fitting cement, Residual pipe insulation and Joint compound.

### Remediation Plan

The identified ACM's will be removed by a State of Connecticut licensed Asbestos Contractor prior to renovation activities. The work will be monitored by a State of Connecticut licensed Asbestos Project Monitor. Re-occupancy air clearance sampling shall be performed within each interior work area follow abatement activities. Waste shipment records will be obtained from the Asbestos Contractor at the completion of the work.

### Contaminant of Concern #2: Lead-Based Paint

Lead-based paint was identified on a number of different components including door systems, window systems, baseboards, cabinets, vents, plaster walls and ceilings

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### Remediation Plan

See Remediation Plan above for Lead Paint under 1 Huntington Street

Contaminant of Concern #7: Microbial Contamination

### Remediation Plan

The water impacted and potentially microbially impacted building materials will be removed during the renovation project. Sources of water incursion shall be corrected. Contractors performing work must protect their employees from exposure to moldy materials. There are no special disposal requirements for micobially impacted building materials.

### **846 Asylum Avenue**

### Contaminant of Concern #1: Asbestos-Containing Materials (ACM)

The building materials listed below was found to be ACM: Residual pipe fitting cement, Brown thick linoleum under carpet, Brown asphalt flooring, Tan caulk at plywood at basement window and Tan window frame caulk. The building materials listed below are Assumed to be asbestos containing: Flooring under underlayment, Flooring below Pergo and Flooring under carpet.

### Remediation Plan

See Remediation Plan for Asbestos -Containing Materials under 834 Asylum Street.

### Contaminant of Concern #2: Lead-Based Paint

Lead-based paint was identified on a number of different components including door systems, plaster walls, window systems, baseboards, stair systems, crown molding, radiator, fire place, plaster walls and ceilings.

### Remediation Plan

See Remediation Plan above for Lead Paint under 1 Huntington Street

### **852 Asylum Avenue**

### Contaminant of Concern #1: Asbestos-Containing Materials (ACM)

The building materials listed below was found to be ACM: White basement window glazing compound, Window frame caulk at aluminum coil stock, White basement window frame caulk, Caulk at plywood entry ceiling, Tan joint compound and exterior window glazing compound.

### Remediation Plan

See Remediation Plan for Asbestos -Containing Materials under 834 Asylum Street.

### Contaminant of Concern #2: Lead-Based Paint

Lead-based paint was identified on a number of different components including door systems, window systems, baseboards, crown molding, radiator, fire place, plaster walls and ceilings, trim components.

### Remediation Plan

See Remediation Plan above for Lead Paint under 1 Huntington Street

Contaminant of Concern #4: Polychlorinated Biphenyls (PCB) in Building Materials and Electrical Equipment Building Materials and Electrical

The basement window glazing compound was confirmed to contain PCB's over the state regulated level of 1.0 parts per million (ppm).

### Remediation Plan

The PCB-containing glazing compound in the basement window systems will be removed for proper disposal prior to renovation activities. Waste shipment records certifying proper disposal of the PCB window glazing compound shall be obtained following remediation activities.

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;	<ul><li>(3) - Potentially adverse;</li><li>(4) - Requires mitigation;</li><li>(5) - Requires project modification</li></ul>	
Energy Consumption	1	The project must meet, at a minimum, City of Hartford and State of Connecticut basic building codes, any existing rehabilitation standards, zoning ordinances, HUD Housing Quality Standards, and the Model Energy Code. https://www.hartfordct.gov/Government/Departments/DDS/DDS-Divisions/Housing-Division)
Noise-Contribution to Community Noise Levels	1	The noise to be generated by construction equipment between 7AM-6PM on weekdays and Saturdays is considered exempt from ordinance ( <i>Hartford Municipal Code, Chapter 23, Noise, Section 23-3(e)</i> ). The project site is also fully surrounded by existing urban and commercial uses, and when occupied is anticipated to have no impact on community noise levels.
Air Quality-Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	1	There are no nearby sources for localized pollution (industry, dump, power stations) and the project consisting of 32 apartments will not contribute significantly to the extent of existing pollution (smog, dust, odors, smoke) in the existing residential and commercial district.
		Demolition and construction activities will include fuel burning equipment, as well as heating, ventilation and air conditioning equipment associated with building operations once construction has been completed. The air emissions from this equipment are anticipated to be minor and will not significantly affect local or regional air quality.
		Potential construction air quality impacts can occur due to the use of diesel-powered construction vehicles. Diesel air emissions include carbon monoxide, hydrocarbons, nitrogen oxides and particulate matter (PM10). Emissions from construction equipment are anticipated to be significantly less than the total emissions from other industrial and transportation sources.
Environmental Design Visual Quality- Coherence, Diversity, Compatible Use and Scale	4	One of the properties 834 Asylum Avenue is historic. The developers sent a Project Notification Form to the State Historic Preservation Office (SHPO). SHPO replied "regarding the Aaron C. Goodman House, 834 Asylum Avenue, <i>The applicant shall demonstrate compliance with the following condition(s) prior to filing the state Part 3 application, Request for Preliminary Certification and Reservation of Tax Credits:</i>
		1. Repointing mortar must match the color, texture, strength, joint width and joint profile of the existing historic masonry. Specifications and repointing samples should be reviewed and approved by the State Historic Preservation Office before proceeding with this work. Good quality overall and close-up color photographs of the masonry both before and after repointing must be submitted with the Request for Certification of Completed Work.
		2. Luxury vinyl tile is not an appropriate substitute for hardwood flooring in a high- style residential structure. The SHPO and NPS will expect that the hardwood floors will be refurbished where possible. If the floors are beyond repair, they should be replaced in-kind or with a historically appropriate material.
		3. The visual impact of adding storm windows must be kept to a minimum. The division of the storm windows, if any, must align with the meeting rail of the historic window, the frames must not be excessively bulky, and the color of the storm windows must match that of the window sash or frame."
		(SHPO, February 4 2020)

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

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Impact Codes:	<ul><li>(3) - Potentially adverse;</li><li>(4) - Requires mitigation;</li></ul>	
(1) - No impact anticipated;		uires miligation, uires project modification
(2) - Potentially beneficial;	(3) - Kequ	r
Demographic Character Changes	1	The proposal complies with Zoning Regulations.
Displacement	4	Currently only approximately 8% of the existing units remain occupied. The proposed project consists of the construction of 32 new housing units at the property.
SOCIOECONOMIC	CODE	Source or Documentation
Employment and Income Patterns	2	The project will result in some temporary construction-related jobs.
Educational Facilities	1	The proposed 32 housing units are not expected to result in a significant increase in the number of total school-aged children within the City of Hartford. The majority of families moving into the new apartments are expected to relocate from other housing within the City; therefore the number of school-aged children throughout the City is anticipated to remain similar to existing levels.
		Based on the available school capacities and projected enrollment, the school- aged children associated with the proposed development can be incorporated into the public school system with the existing school systems.
Commercial Facilities	1	In the mile surrounding the project site, there are several commercial entities such as banks, salons, medical offices, markets, pharmacies and eateries.
		(Area knowledge/field observation.
COMMUNITY FACILITIES AND SERVICES	CODE	Source or Documentation
Health Care	1	The majority of families moving into the proposed housing units are expected to relocate from other housing within the City of Hartford; therefore the increased demand on city-wide healthcare and social services is not expected to be significant.
		St. Francis Hospital is a full-service health care facilities located within 1 mile of the project site (Map included in Environmental Review Record).
Social Services	1	The majority of families moving into the proposed housing units are expected to relocate from other housing within the City of Hartford; therefore the increased demand on city-wide healthcare and social services is not expected to be significant.
		There are several and varied social service providers within close proximity of the project site
COMMUNITY FACILITIES AND SERVICES	CODE	Source or Documentation
Solid Waste	1	The majority of families moving into the proposed housing units are expected to relocate from other housing within the City of Hartford; therefore the increased demand on city-wide solid waste disposal and recycling is not expected to significant. Trash collection and recycling for the proposed redevelopment will be provided by the City of Hartford Sanitation Division.
Waste Water	1	The project site is currently served by sanity sewer owned by The Metropolitan District (MDC). The proposed project will result in the net increase of approximately

### **DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION**

Impact Codes:	(3) - Potentially adverse;	
<ul><li>(1) - No impact anticipated;</li><li>(2) - Potentially beneficial;</li></ul>	<ul><li>(4) - Requires mitigation;</li><li>(5) - Requires project modification</li></ul>	
(-)	( )	32 units. The proposed action will only slightly increase the demand for public utilities and services within the Blue Hill Neighborhood including wastewater/sanitary sewer utilities. (http://www.themdc.com).
Storm Water	1	Based on the site's urban setting, stormwater likely discharges to the municipal storm sewers. The project developer will ensure that facilities shall be connected to MDC storm water disposal service as other facilities in the area. Storm water is channeled to MDC storm drains, either through direct rain leaders or appropriate site grading. (http://www.themdc.com)
Water Supply	1	The project site is served by municipal water and sewer through the Metropolitan District Commission. <i>(http://www.themdc.com)</i> No change is anticipated as the project site was once occupied by residences.
Public Safety - Police	1	The project site is served by municipal water and sewer through the Metropolitan District Commission. (http://www.themdc.com) No change is anticipated as the project site was once occupied by residences.
- Fire	1	911 services are available throughout Hartford for public safety emergencies. Hartford Police Department headquarters, located at 253 High Street, is approximately 1.0 miles west of the project site.
- Emergency Medical	1	911 service is available throughout Hartford for fire emergencies and the Fire Department is the first responder for medical emergencies. Fire Department Headquarters at 253 High Street, is approximately 1.0 miles from the project site.
Open Space and Recreation -Open Space	1	Pope Park is located 1.2 miles from the project site and features areas for basketball, spray and swimming pools, baseball and soccer.  Knowledge/Field Observation).
COMMUNITY FACILITIES AND SERVICES	CODE	Source or Documentation
-Recreation	1	Pope Park is located 1.2 miles from the project site and features areas for basketball, spray and swimming pools, baseball and soccer.  Knowledge/Field Observation).
-Cultural Facilities	1	Project site is in close proximity (local bus) to a variety of cultural facilities such as the Wadsworth Atheneum; Bushnell Auditorium; Hartford Civic Center; Theatreworks/Artworks Gallery; Hartford Public Library; the CT Convention Center; worship centers of many denominations (Area Knowledge/Field Observation; web and directory search).
Transportation	1	The project is unlikely to result in significantly more traffic than currently exists or historically existed in the project area. The site is served by Connecticut Transit's 60, 63, 64 and 66 bus routes on Asylum Avenue. (cttransit.com) The Amtrak train and multi-carrier bus station are located approximately 0.5 mile from the project site. (Google Maps)

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

# **HOME INVESTMENT PARTNERSHIP PROGRAM** 2019-2020

Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;	<ul><li>(3) - Potentially adverse;</li><li>(4) - Requires mitigation;</li><li>(5) - Requires project modification</li></ul>	
NATURAL FEATURES	CODE	Source or Documentation
Water Resources	1	There are no sole source aquifers designated by the U.S. Environmental Protection Agency (EPA) within Hartford, CT. Properties are serviced by both municipal water and sewer since at least the early 1900s. MDC records also indicated that municipal sanitary sewer and public water has been available to the overall area since the mid to late 1800s.
Surface Water	1	The nearest watercourse to the site is the Park River approximately 1,700 feet west of the subject site. The classification is C/B, which represents a surface water body that is not currently meeting one or more class B water criteria as a result of one or more sources of pollution.
Unique Natural Features and Agricultural Lands	1	Project site not located in the 100-year or 500-year floodplain. (ArcMap including flood plain boundaries included in Environmental Review Record).
Vegetation and Wildlife	1	Project site is currently developed as urban land, and is not in the vicinity of any endangered species. (indicated on Property Detail Map included in Environmental Review Record)
OTHER FACTORS	CODE	Source or Documentation
Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	1	Project site is not located on the 100 or 500 year flood zone. (ArcMap including flood plain boundaries included in Environmental Review Record).
Coastal Barrier Resources Act- Coastal Barrier Improvement Act [§58.6(c)]	1	Hartford is not a Coastal City. (Connecticut map, included in Environmental Review Record).
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]	1	Project is not located within 2500 feet of runway of a designated FAA facility. (Revised HUD Tidbit #06-021 dated 7/21/06).

### PART III: SUMMARY OF FINDINGS AND CONCLUSIONS

### **Alternatives to the Proposed Actions**

No significant and unavoidable adverse impacts were identified for the proposed project. Therefore, project alternatives or modifications have not been considered.

### No Action Alternative [24 CFR 58.40(e)]

Under the "No-Action" Alternative, the buildings of 834, 846, and 852-854 Asylum Avenue are currently unoccupied. The 842-842H parcel consists of a 30-vehicle parking lot. The 1 Huntington Street building is currently used as multi-family residential apartments. In July 2019 only two units of 1 Huntington Street were reportedly occupied. The abandoned units would be significantly underutilized which would lead to blight and the community would be detrimentally impacted.

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

# **HOME Investment Partnership Program** 2019-2020

### **Summary of Findings and Conclusions**

The proposed redevelopment of Clover Gardens will provide new housing units that will greatly benefit the surrounding neighborhood and help promote a diverse and economically integrated residential neighborhood. No negative impact to human health or the environment is anticipated as a result of this project, given the mitigation measures proposed below. Based on the findings of the Statutory Checklist and the Environmental Assessment Factors Checklist, formal compliance steps or mitigation is required in the following resource categories:

### Mitigation Measures Recommended [24 CFR 58.40(d), 40 CFR 1508.20]

Summarized on the following page are all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

### Mitigation Measures

From July 17 2020 Report - Clover Gardens - Environmental Assessment - Summary of Environmental Issues; 834-854 Asylum Avenue & 1 Huntington Street, Hartford, Connecticut Five adjoining properties (Areas of Concern 1 - 5) GEI Consultants

### Summary of issues common to all five properties (Areas of Concern 1-5):

Paint on the buildings contained lead and has chipped off onto the soils adjacent to the buildings. Likewise, certain window caulking may have contained polychlorinated biphenyls (PCBs) and might have impacted soils around the buildings. Finally, past use of pesticides (chlordane in particular) around the building foundations may have left a residual in soils. Testing was performed to evaluate the condition of the soils in comparison to residential standards and the following was concluded:

### Constituents of Concern (COCs):

Lead: Certain soils contained concentrations of lead and require removal of those soils to 12 or 18 inches, depending on the location.

Chlordane: Certain low concentration residuals remain in soils and, at one location, requires removal of soils to 18 inches.

After removal of the impacted soils, clean soils will be used to replace those removed.

Three, unused underground fuel oil tanks require removal. Each of the tanks was evaluated and soils around two of the tanks requires removal of a small quantity of impacted soils. COCs are petroleum by CT ETPH method and volatile organic compounds (VOCs) by Method 8260. When the remediation is completed, the remaining soils on each of the five properties will meet residential standards and not require any special management.

### Area of Concern #1: 1 Huntington Street:

The work on this parcel consists of the following:

- Removal of 2,000-gallon underground fuel oil tank and a small quantity of soils around the tank
- Excavation and removal of certain lead-impacted soils to a depth of 12 or 18 inches, depending on location; and
- Replacement of the soils to the existing grade.

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

# **HOME Investment Partnership Program** 2019-2020

### Mitigation Measures

### Remediation Plan:

### **Assumptions**

The release of petroleum around the tank is minor and it is assumed that the tank and the affected soils may be removed to meet the residential and pollutant mobility standards. The lead contamination has been fully characterized and may be removed to meet the residential standards.

### Remediation Tasks

Excavate a total of 63.5 cubic yards (estimated 101.6 tons) of soil for off-site disposal. Collect confirmation soil samples in the UST excavation. Backfill with clean soil.

Removal and proper disposal of a 2,000-gallon fuel oil tank at 1 Huntington Street and certain petroleum contaminated soils. Approximately 10 CY (16 tons) of petroleum impacted soils will be removed and comingled with the lead impacted soil stockpile. The combined volume of the tank and petroleum soils removed is about 20 CY. Place 10 CY of processed stone in the completed excavation to stabilize it until the general contractor can complete backfilling.

### Area of Concern #2: 834 Asylum Street:

The work on this parcel consists of the following:

- Remove 1,000-gallon fuel oil UST and a small quantity of soils.
- Replacement of the soils to the existing grade.

### Remediation Plan:

### Assumptions

The release of petroleum around the tank is minor and it is assumed that the tank and the affected soils may be removed to meet the residential and pollutant mobility standards. The lead contamination has been fully characterized and may be removed to meet the residential standards.

### Remediation Tasks

Removal and proper disposal of a 1,000-gallon fuel oil tank at 834 Asylum Avenue and certain petroleum contaminated soils. Approximately 10 CY (16 tons) of petroleum impacted soils will be removed and comingled with the lead impacted soil stockpile. The combined volume of the tank and petroleum soils removed is about 15 CY. Place 10 CY of processed stone in the completed excavation to stabilize it until the general contractor can complete backfilling.

### Area of Concern #3: 842 Asylum Avenue:

The work on this parcel consists of the following:

No action is required on this parcel.

### Area of Concern #4: 846 Asylum Avenue:

The work on this parcel consists of the following:

- Excavation and removal of certain lead-impacted soils to a depth of 12 or 18 inches, depending on location; and
- Replacement of the soils to the existing grade.

### Remediation Plan:

### Assumptions

The lead contamination has been fully characterized and may be removed to meet the residential standards. Remediation Tasks

Excavate a total of 45.5 cubic yards (estimated 72.8 tons) of soil for off-site disposal. Backfill with clean soil.

### Area of Concern #5: 852-854 Asylum Avenue:

The work on this parcel consists of the following:

- Excavation and removal of certain chlordane and lead-impacted soils to a depth of 18 inches;
- Remove 1,000-gallon previously abandoned in place fuel oil UST; and
- Replacement of the soils to the existing grade.

### **Remediation Tasks**

Excavate a total of 8 cubic yards (estimated 12.8 tons) of soil for off-site disposal. Backfill with clean soil. Remove the fuel oil tank and dispose of it as scrap metal.

### DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

# **HOME Investment Partnership Program** 2019-2020

### **Attached Studies or Summaries**

- 1. Phase I Environmental Site Assessment, 834, 842-842H, 846, & 852-854 Asylum Avenue and 1 Huntington Street Hartford, Connecticut June 24, 2019; GEI Consultants
- Eagle Environmental, Inc. Clover Gardens, Environmental Assessment Summary of Hazardous Building Materials; Customized report for each location: 834, 842-842H, 846, & 852-854 Asylum Avenue and 1 Huntington Street Hartford, Connecticut - June 2020.
- 3. July 17 2020 Report Clover Gardens Environmental Assessment Summary of Environmental Issues;

834-854 Asylum Avenue & 1 Huntington Street, Hartford, Connecticut Five adjoining properties (Areas of Concern 1-5) GEI Consultants

### List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]

- 1) City of Hartford Planning and Zoning Regulations
  - (https://www.hartfordct.gov/Government/Departments/DDS/DDS-Divisions/Planning-Zoning)
- 2) City of Hartford 2016-2020 Consolidated Plan
- 3) CT Transit Bus Schedule (www.cttransit.com)
- **4)** United States EPA Website (www.epa.gov)
- 5) City of Hartford Website (www.hartfordct.gov)
- **6)** Hartford Public Schools Website (www.hartfordschools.org)
- **7)** Metropolitan District Commission Website (www.themdc.com)
- 8) Google Maps
- 9) ESRI/ArcMap
- 10) Centers for Disease Control/NIOSH Website (www.cdc.gov/niosh/)
- **11)** CT Dept. of Environmental Protection (www.ct.gov/dep/)
- **12)** Riverfront Recapture website ( www.riverfront.org)
- 13) Area Knowledge/Field Observation by Environmental Review Officer

### **Additional Notes:**

This Environmental Assessment was prepared based on the Phase I Environmental Site Assessment and all related documents submitted to the Department of Development Services Housing and Property Division.

**Clover Gardens Limited Partnership** shall provide the Department of Development Services Department, Division of Housing and Property and the Department of Management and Budget, Office of Central Grants with documentation of the remedial action taken, contaminants found in the process, and any additional information that may change the scope of the work recommended on the aforementioned environmental report(s).

**Clover Gardens Limited Partnership** shall be aware that this environmental assessment is subject to revision, should conditions change.