

ENVIRONMENTAL ASSESSMENT

CITY OF HARTFORD

DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

HOME INVESTMENT PARTNERSHIP PROGRAM

2019-2020

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PROJECT NAME:

Edwards Street Housing, LLC

PROJECT LOCATIONS:

70, 72 and 76 Edwards Street
Hartford, CT

PROJECT SPONSOR:

Naek Construction
27 Naek Road
Vernon, CT 06066

PROJECT CONTACT:

Contact – Rashid Hamid 860-875-1895

ESTIMATED TOTAL PROJECT COST:

Total development costs are estimated to be: \$ 1,247,700.

Construction Funding sources are estimated to be the following:

Hartford HOME Subsidy during Construction	\$ 427,500
Conventional Bank Construction Loan	\$ 692,838
Developer Equity	\$ <u>80,000</u>
Total Interim Sources	\$ 1,199,838
Costs Not incurred until sales	\$ 47,362

Permanent Funding sources are estimated to be the following:

City of Hartford HOME Funds	\$ 450,000
Est. Sales Proceeds (based on Appraised Value)	\$ <u>797,700</u>
Total Sources	\$ 1,247,700

RESPONSIBLE ENTITY:

City of Hartford
Management and Budget Department, Office of Central Grants Admn
550 Main Street, Room 302, Hartford, CT 06103

CERTIFYING OFFICER:

Lionel Rigler, Environmental Review Project Manager (860) 757-9277

CONDITIONS FOR APPROVAL:

List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts or other relevant documents as requirements. [24 CFR 58.40(d), 40 CFR 1505.2(c)]

ENVIRONMENTAL FINDING: [58.40(g)]

- ☐ Categorical exclusion is made in accordance with § 50.20.
- ☒ Environmental Assessment and a Finding of No Significant Impact (FONSI) is made in accordance with § 50.33.
- ☐ Environmental Assessment and a Finding of Significant Impact is made, and an Environmental Impact Statement is required in accordance with §§ 50.33(d) and 50.41.

THIS ENVIRONMENTAL ASSESSMENT WAS PREPARED BY:

Name: Lionel Rigler

Title: Environmental Review Project Manager

Signature: Lionel Rigler

Date: August 24 2020

APPROVED BY:

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Name: Joan Barere

Title: Director, Office of Central Grants Administration

Signature: Joan Barere

Date: August 24, 2020

PART ONE: PROJECT DESCRIPTION AND ACTIVITIES

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

The proposed development consists of the construction of two (2) two-family owner-occupied homes on 70 and 72 Edwards Street and one (1) two-family owner occupied home on 76 Edwards Street.

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]

Edwards Street Housing LLC has proposed building three (3) two-family houses, totaling 6 units, 3 homeownership and 3 rental units, to be located at 70, 72 and 76 Edwards Street, all three of which will be HOME assisted. Each two-family will consist of two, three-bedroom units. The owner's unit will have one and a half bathrooms and access to a full basement. The developer will also include energy star appliances and mechanical systems. The target market for this development will be first time home buyers.

The structures will be wood-framed two-story homes including front porches, pitched gabled roofs, and living room bay window features typical of the Hartford architectural style. Each apartment is approximately 1,225 square feet (2,450 square feet total for both floors) consisting of three (3) Bedrooms, Bathroom, Kitchen, Dining Area, and Living Room. The first floor plan also incorporates a second full bathroom with laundry facilities in the basement. Edwards Street Housing, LLC has priced the homes at \$265,900 based on current development costs and market conditions.

City of Hartford HOME funds will be used for construction costs and permanent financing. Construction will start in August 2020 and is scheduled to be completed by July 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)]

In the absence of this project, the existing parcels would likely remain blighted and vacant for some time.

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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]			✓				70 and 76 Edwards Street are located in the Clay Hill Historic District on the Connecticut National Register of Historic Places. The City of Hartford's Historic Preservation Commission met on March 18, 2020 and determined that for 76 Edwards Street "the proposed two story, wood frame building is compatible with the massing, and height of the adjacent buildings and the proposed building will not detract from the historic character of the street and the district and is consistent with the City's Historic Design Principles." <i>(March 19 2020, Hartford Historic Preservation Commission, attached.)</i>
Floodplain Management [24CFR55, EO 11988]	✓						Project site is not located within the 100-year flood zone and does not require flood insurance. <i>(indicated on Property Detail Map included in Environmental Review Record)</i>
Wetlands Protection [EO 11990]	✓						Project not in wetland areas defined by City 1987 Designated Inlands, Wetlands, and Watercourses Map. <i>(included in Environmental Review Record)</i>
Coastal Zone Management [Sec. 307(c), (d)]	✓						Hartford is not located in a coastal zone. CT Map. <i>(included in Environmental Review Record)</i>
Water Quality– Aquifers [40 CFR 149]	✓						Hartford is not located on a sole source aquifer. State of CT Aquifer Map. <i>(included in Environmental Review Record)</i>

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Endangered Species [50 CFR 402]	✓						None in area, per Natural Diversity Database Digital Data on attached Property Detail Map. (www.hud.gov/offices/cpd/environment/review/endangered-species.cfm)
Wild & Scenic Rivers [Sections 7 (b), (c)]	✓						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]	✓						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)
Farmlands Protection [7 CFR 658]	✓						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]	✓						Project is an Acceptable Safe Distance from thermal/explosive hazards, the project will expose neither people nor buildings to such hazards. (Phase I Environmental Site Assessment, Aegis, Inc., June 20, 2013,)
Noise [24 CFR 51 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)
Airport Clear Zones [24 CFR 51 D]	✓						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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Toxic Sites [24 CFR 58.5(i)(2)]			✓			✓	<p><i>(From "Phase I Environmental Site Assessment, 76 Edwards Street, conducted by Freeman Companies and reported on October 1, 2019)</i></p> <p><u>Phase I Environmental Site Assessment</u> <u>Chestnut and Edwards Street – Tracts D,E,G</u> <u>Prepared by Fuss and O'Neil – December 1998</u></p> <p>Fuss & O'Neill Inc. completed a Phase I ESA of the Subject Property. The ESA consisted of a site reconnaissance, records review, interviews and other components consistent with the requirements of ASTM E 1527-13. The ESA is in regard to the Subject Property, as well as adjacent properties (Tract E and Tract G). The Subject Property is referred to as "Tract D". Site inspections included observations of a decomposed 55-gallon drum on the Subject Property that contained wood and metal debris, and undetermined contents. Additionally, an area contain what appeared to be black ash/cinder was observed on the Subject Property. Fuss & O'Neill Inc.'s conclusions include that previous sampling (a 1998 sampling event for metals conducted on areas adjacent to the Subject Property) indicates that areas adjacent to the Subject Property (Tract D) have exceedances on the Connecticut RSRs criteria for lead, and that the extent and composition of the area with black ash/cinder layer in the Subject Property is unknown. Fuss & O'Neill Inc. recommended that a Phase II Environmental Site Assessment be conducted to determine extent of lead in soils, groundwater quality, determine contents of the 55-gallon drum, and further characterize the black ash layer located in the Subject Property. .</p> <p><u>Environmental Site Assessment</u> <u>Chestnut and Edwards Streets – Tracts D,E,G</u> <u>Prepared by Fuss & O'Neill April 1999</u></p>

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						<p>Fuss & O'Neill Inc. completed an ESA of the Subject Property. The ESA consisted of soil sampling in order to determine if the environmental concerns at the Subject Property (Tract D), and adjacent properties (Tract E and Tract G) had impacted soil and/or groundwater, and would be suitable for potential school gardens. Fuss & O'Neill Inc. concluded that the existing conditions are not suitable for the proposed short term use based on the following: soil samples that exceeded the RES DEC for lead, and soil samples that exceeded the GA PMC for lead. Although the Subject Property is located in a GB groundwater area, the results were compared to the GA PMC due to the potential future use of school gardens. Fuss and O'Neill Inc. recommended a remediation plan be developed to address contaminated soil.</p>
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Remediation Action Plan						✓	<p><u>Remedial Action Plan</u> <u>70 & 76 Edwards Street</u> <u>Prepared by Freeman Companies – July 2017</u></p> <p>Freeman Companies completed a Remedial Action Plan (RAP) for the Subject Property, which was submitted to the Environmental Protection Agency (EPA) Region 1. The RAP included a remediation delineation, the primary object of which was to provide a current status of environmental conditions at the Subject Property, as the last environmental work was completed in 2001. Soil sampling activities were conducted on May 30, 2017. The results indicated that one sample exceeds the RES DEC for lead.</p> <p><u>Remedial Action Report</u> <u>70 & 76 Edwards Street</u> <u>Prepared by Freeman Companies – August 2018</u></p> <p>Freeman Companies completed a Remedial Action Report (RAR) for the Subject Property, which was submitted to the Environmental Protection Agency (EPA) Region 1. The RAR was prepared for the City of Hartford using funding from EPA funded Brownfield Cleanup grant, and presents the details of remediation conducted in October 2017. Two (2) rounds of excavation with post excavation sampling were conducted on the Subject Property. The excavation area was 20' x' 20' x 2'. Final post excavation sample results indicated that total lead was below the RES DEC. Freeman stated that as the remediation was focused on compliance with RES DEC and executed an exception for GB PMC.</p> <p>(PMC does not apply to fill material provided VOCS are not present above PMC, fill meets RES/I/C DEC, water supply will not be affected, public water is available within two hundred (200) feet, and the fill was not illegally placed), compliance with post remediation groundwater monitoring was not performed. Freeman stated</p>

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						that based on the activities discussed in the RAR, the soil remediation on the Subject Property is considered complete.
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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.
Environmental Justice [EO 12898]	✓						<p>This project will create three (3) two-family houses, totaling 6 units, 3 homeownership and 3 rental units. Each two-family will consist of two, three-bedroom units.</p> <p>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.</p>
Flood Insurance - 58.6(a)	✓						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)
Coastal Barriers - 58.6(b)	✓						Hartford is not located in a coastal zone. (CT map included in Environmental Review Record)
Airport Clear Zone Notification - 58.6(c)	✓						Project is not located within 2500 feet of runway of a designated FAA facility. (revised HUD Tidbit #06-021, dated 7/21/06)
Water Quality	✓						<p>The quality of groundwater beneath the Site is classified by the DEEP as GB. Such groundwater may be not be suitable for human consumption without treatment due to waste discharges, spills, leaks of chemicals, or land use impacts. (DEEP, Water Quality Standards)</p> <p>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)</p>
Solid Waste Disposal	✓						See Remediation Action Plan Section
Fish and Wildlife	✓						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)

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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			✓			✓	If asbestos is encountered during project activities, the contractor is responsible to handle and dispose of asbestos according to State and Federal laws, and to notify the Div. of Grants Management of any change in the project. http://www.dph.state.ct.us/BRS/asbestos/40CFR763WHOLE.pdf
LBP Abatement			✓			✓	Based on the project description, activities to be undertaken do not consist of lead-based paint abatement. If encountered during project activities, the contractor is responsible to handle and/or dispose of lead-based paint according to State and Federal laws, and to notify the Division of Grants Management of any change in the project scope. www.dph.state.ct.us/BRS/Lead/RegsandStatutes/lead_regulations.htm

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B) ENVIRONMENTAL ASSESSMENT

[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:		(3) - Potentially adverse;
(1) - No impact anticipated;		(4) - Requires mitigation;
(2) - Potentially beneficial;		(5) - Requires project modification
LAND DEVELOPMENT	CODE	SOURCE OR DOCUMENTATION
Conformance with Comprehensive Plans and Zoning	2	<p><u>Planning and Zoning Report – for both 70 and 72 Edwards</u></p> <p>FINDING OF FACTS</p> <p>At the May 6, 2020 HPC meeting the Commission approved a modified resolution for this project. Drawings reviewed with this application are entitled "Edwards Street Housing Project, City of Hartford Planning and Zoning Commission Site Plan Review Submission, 70 & 72 Edwards Street, Hartford, Connecticut", prepared by Freeman Companies, dated 6/26/2020 and last revised 7/27/2020, consisting of 5 sheets, and architectural drawings entitled "Duplex, CTM-L, Serial No. 20089", prepared by Westchester Modular Homes Inc., dated 6/10/2020, last revised 6/19/2020, consisting of 15 sheets. Provided Front Lot Line Coverage (64.8%) does not meet the 75% minimum required per Sec.4.15.2.A(2), and provided Transparency on the Ground Floor story of the front facade is 14%, where a minimum of 15% is required per Sec.4.15.2.D.(19}. Since these deviations from minimum requirements are within 15% of the requirement, the zoning administrator may approve them in accordance with Sec. 1.3.3.C.(5). The City Forester reviewed the project and provided comments on 7/29/2020, which have been noted in the latest submitted drawings. The City Engineer accepted the plans on 7/29/2020.</p> <p>ANALYSIS</p> <p>Other than deviations identified above, the application conforms with all provisions of the Zoning Regulations. Conditions of Approval: 1} Work within the ROW is subject to DPW approval; 2} Utilities must be constructed per approval from MDC/other utility company; 2} Changes in exterior building materials are subject to approval by Planning Division staff to ensure compliance with Sec.4.0; 3} Compliance with the HPC 5/6/2020 approved resolution and conditions of approval is required, including providing 2"x2" square balusters and 6"x6" turned posts on the front porch.</p> <p>STAFF RECOMMENDATION</p> <p>Staff recommends approval, subject to conditions – August 8 2020</p>
Compatibility and Urban Impact	2	<p>The Clay-Arsenal Revitalization Zone sent a letter of support for this project. (<i>Letter dated March 3, 2020 included in Environmental Review Record</i>)</p>
Slope	1	<p>The site is located at an average elevation of approximately 45 feet above sea level. The topography of the site is level, and the vicinity slopes down to the east. (<i>"Phase I Environmental Site Assessment, 76 Edwards Street, conducted by Freeman Companies and reported on October 1, 2019).</i></p>

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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. <i>(www.cicacenter.org/pdf/ctpermit.pdf)</i>
Soil Suitability	1	According to the GIS database for Hartford County Soil Survey, the Site is underlain by the Udorthents-Urban Land Complex, which is defined as non-wetland, non-hydric soils located with densely developed urban lands. <i>("Phase I Environmental Site Assessment, 76 Edwards Street, conducted by Freeman Companies and reported on October 1, 2019 in Environmental Review Record)</i>
Hazards and Nuisances including Site Safety	4	See Toxic Sites and Remediation Action Plan, pages 6-9 of this report.
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. <i>(http://www.hartford.gov/images/lni/building_permit_application.pdf)</i> <i>(http://www.hartford.gov/images/Planning/Zoning_Regs_Amended_To_July_23rd_2013_No_Tracking.pdf)</i>
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	<p>There are no nearby sources for localized pollution (industry, dump, power stations) and the project consisting of three (3) two-family houses, totaling 6 units will not contribute significantly to the extent of existing pollution (smog, dust, odors, smoke) in the existing residential and commercial district.</p> <p>The 1990 Clean Air Act, its amendments, and NEPA require that air quality impacts be addressed in the preparation of environmental documents. The U.S. Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) for six "criteria" pollutants; carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM10 and PM2.5), sulfur dioxide and lead, and define the allowable concentrations that may be reached but not exceeded in a given time period to protect human health (primary standard) and welfare (secondary standard) with a reasonable margin of safety.</p> <p>Primary and secondary standards for NAAQS have been established for most of the criteria pollutants. The EPA is authorized to designate those locations that have not met the NAAQS as non-attainment and to classify these non-attainment areas according to their degree of severity. Attainment pertains to the compliance/violation of any of the National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants mentioned above. Each year, states are required to submit an annual monitoring network plan to EPA. The network plans provide for the creation and maintenance of monitoring stations, in accordance with EPA monitoring requirements specified in 40 CFR (Code of Federal Regulations) Part 58. The State of Connecticut's most recent Air Monitoring Network Plan was submitted to EPA Region 1 for approval in July 2011.</p>

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Environmental Design Visual Quality- Coherence, Diversity, Compatible Use and Scale	1	The properties at (70 and 76 Edwards Street) are in the Clay Arsenal Neighborhood. The City of Hartford’s Historic Preservation Commission has reviewed and approved the project plans provided the applicant adds a window to the south side of the addition on the fourth floor. <i>(Received October 28, 2013, included in the Environmental Review Record).</i>
Demographic Character Changes	1	The properties (70 and 76 Edwards Street) are zoned NX-1, permits single family and multi-family housing up to 4 units. This proposal complies with standard.
Displacement	1	No displacement, both properties are vacant land.
SOCIOECONOMIC	CODE	SOURCE OR DOCUMENTATION
Employment and Income Patterns	2	The project will most likely support the local construction industry on a short term basis. The project site is located in Census Tract 5017; its population contains 89.7% low- and moderate- income families <i>(2000 Census)</i> .
Educational Facilities	1	The addition of 6 units is not anticipated to impact the demand for educational services.
Commercial Facilities	1	In the surrounding half-mile of the project site, there are several commercial entities such as banks, salons, markets, shoe repair, eateries and nightclubs <i>(MapQuest; area knowledge/field observation)</i> .
COMMUNITY FACILITIES AND SERVICES	CODE	SOURCE OR DOCUMENTATION
Health Care	1	Based on the project description, which includes production of 6 additional housing units, no adverse impact is anticipated to the demand on health services. ST. Francis Hospital is a full-service health care facilities located within 1 mile of the project site <i>(Map included in Environmental Review Record)</i> .
Social Services	1	Based on the project description, which includes production of 6 additional housing units, no adverse impact is anticipated to the demand on social services. In addition to services offered by the City’s Health and Human Services Department, there are several and varied social service providers within close proximity of the project site <i>(2011 ArcMap with a sampling of providers/locations included in Environmental Review Record)</i> .
COMMUNITY FACILITIES AND SERVICES	CODE	SOURCE OR DOCUMENTATION
Solid Waste	1	Site is included in the City’s weekly Dept. of Public Works pickup schedule. (Regulations are detailed in the City’s Waste and Recycling Guidelines, Rules, and Regulations 2006 Edition <i>(http://www.hartford.gov/images/DPW/MunicipalCode_1527_1536.pdf)</i>)
Waste Water	1	The City’s wastewater is handled by the Metropolitan District Commission sewage plant service <i>(http://www.themdc.com)</i> .

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Storm Water	1	Stormwater structures were not observed on site. 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 (http://www.themdc.com). No change is anticipated as the project site was once occupied by residences and commercial entities.
Public Safety - Police	1	911 services are available throughout Hartford for public safety emergencies. Hartford Police Department headquarters, located at 253 High Street, is approximately .3 miles east of the project site. (<i>Mapquest; http://www.hartford.gov/police/contacts</i>)
- Fire	1	911 service is available throughout Hartford; the Hartford Fire Department is the first responder for medical emergencies. Fire Headquarters, located at 253 High Street, is approximately .3 miles from the site. (http://www.hartford.gov/fire/fire-house-locations)
- Emergency Medical	1	911 service is available throughout Hartford; the Hartford Fire Department Headquarters is the first responder for medical emergencies is located at 253 High Street approx .3 miles from the site. (http://www.hartford.gov/fire/fire-house-locations)
Open Space and Recreation -Open Space	1	Keney Park is located within walking distance from project site and features an area for baseball, cricket, tennis, basketball, playgrounds, spray and swimming pools (http://www.hartford.gov/parks/202-keney-park and Knowledge/Field Observation).
COMMUNITY FACILITIES AND SERVICES	CODE	SOURCE OR DOCUMENTATION
-Recreation	1	Keney Park is located within walking distance from project site and features an area for baseball, cricket, tennis, basketball, playgrounds, spray and swimming pools (http://www.hartford.gov/parks/202-keney-park and Knowledge/Field Observation).
-Cultural Facilities	1	Project site is in close proximity (walking distance/local bus) to a variety of cultural facilities such as the Charter Oak Cultural Center, Butler McCook House, Wadsworth Atheneum; Bushnell Auditorium; Hartford Civic Center; Theatreworks/Artworks Gallery; Hartford Public Library; the CT Convention Center; worship centers of many denominations (<i>Area Knowledge/Field Observation; web and directory search</i>).
Transportation	1	The project is unlikely to result in significantly more traffic than currently exists or historically existed in the project area. The Amtrak train and multi-carrier bus station are located approximately 1 mile from the project site. The site is also served by Connecticut Transit’s 50, 52, 54, 56 and 58 bus routes (www.cttransit.com).
NATURAL FEATURES	CODE	SOURCE OR DOCUMENTATION
Water Resources	1	The quality of groundwater beneath the Site is classified by the Connecticut Department of Energy and Environmental Protection (DEEP) formerly known as the Department of Environmental Protection (CTDEP) as GB (DEEP, 2010). Such

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Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;			(3) - Potentially adverse; (4) - Requires mitigation; (5) - Requires project modification
			groundwater may not be suitable for human consumption without treatment due to waste discharges, spills, leaks of chemicals, or land use impacts (DEEP, 2002). <i>(Phase I Environmental Site Assessment by Aegis, Inc. dated June 20, 2013 in Environmental Review Record)</i> The 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		No mapped inland wetlands have been identified on or proximate to the site. <i>(Phase I Environmental Site Assessment by Aegis, Inc. dated June 20, 2013 in Environmental Review Record)</i>
Unique Natural Features and Agricultural Lands	1		Project site not located in the 100-year or 500-year floodplain. <i>(ArcMap including flood plain boundaries included in Environmental Review Record).</i>
Vegetation and Wildlife	1		Project site is currently developed as urban land, and is not in the vicinity of any endangered species. <i>(ArcMap including Natural Digital Diversity Data included in Environmental Review Record).</i>
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. <i>(ArcMap including flood plain boundaries included in Environmental Review Record).</i>
Coastal Barrier Resources Act- Coastal Barrier Improvement Act [§58.6(c)]	1		Hartford is not a Coastal City. <i>(Connecticut map, included in Environmental Review Record).</i>
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. <i>(Revised HUD Tidbit #06-021 dated 7/21/06).</i>

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)]

The No Action Alternative: This alternative considers the impact of no change at the site; the building at the project site would have not been redeveloped would continue to negatively impact aesthetics, socioeconomic conditions, and public health and safety as compared to the proposed project.

CITY OF HARTFORD

DEPARTMENT OF DEVELOPMENT SERVICES-HOUSING AND PROPERTY MANAGEMENT DIVISION

HOME INVESTMENT PARTNERSHIP PROGRAM

2019-2020

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

Remedial Action Report

70 & 76 Edwards Street

Prepared by Freeman Companies – August 2018

Freeman Companies completed a Remedial Action Report (RAR) for the Subject Property, which was submitted to the Environmental Protection Agency (EPA) Region 1. The RAR was prepared for the City of Hartford using funding from EPA funded Brownfield Cleanup grant, and presents the details of remediation conducted in October 2017. Two (2) rounds of excavation with post excavation sampling were conducted on the Subject Property. The excavation area was 20' x' 20' x 2'. Final post excavation sample results indicated that total lead was below the RES DEC. Freeman stated that as the remediation was focused on compliance with RES DEC and executed an exception for GB PMC.

(PMC does not apply to fill material provided VOCs are not present above PMC, fill meets RES/I/C DEC, water supply will not be affected, public water is available within two hundred (200) feet, and the fill was not illegally placed), compliance with post remediation groundwater monitoring was not performed. Freeman stated that based on the activities discussed in the RAR, the soil remediation on the Subject Property is considered complete.

Attached Studies or Summaries

- 1) Phase I Environmental Site Assessment – 76 Edwards Street dated October 1, 2019 from Freeman Companies.
- 2) Phase I Environmental Site Assessment – 76 Edwards Street dated September 15, 2019 from Freeman Companies.
- 3) Phase I Environmental Site Assessment – 70 Edwards Street dated October 1, 2019 from Freeman Companies.
- 4) Phase I Environmental Site Assessment – 70 Edwards Street dated September 12, 2019 from Freeman Companies.
- 5) Proposal for Development of 70 and 76 Edwards Street dated June 11, 2018 from Edwards Street Housing, LLC.
- 6) The Clay Arsenal Neighborhood letter of approval dated March 3, 2020.
- 7) City of Hartford Planning and Zoning Committee letter of approval dated August 8, 2020.
- 8) City of Hartford Department of Development Services – Recommendation for Preliminary Approval of HOME Funding, dated February 18, 2020

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

- 1) City of Hartford Planning and Zoning Regulations (<http://www.hartford.gov/Development/lic-inspect/lic-build-permitapp.htm>)
- 2) City of Hartford 2010-2015 Consolidated Plan (<http://grants.hartford.gov/Pdf/Reports/ConPlan/Con%20Plan%202010-2015.pdf>)
- 3) CT Transit Bus Schedule (www.cttransit.com)
- 4) United States EPA Website (www.epa.gov)
- 5) City of Hartford Website (www.hartford.gov)
- 6) Hartford Public Schools Website (www.hartfordschools.org)
- 7) Metropolitan District Commission Website (www.themdc.com)
- 8) Mapquest (www.mapquest.com)
- 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 Assessments and all related documents submitted to the Department of Development Services Housing and Property Division.

Naek Construction, LLC shall be aware that this environmental assessment is subject to revision, should conditions change.