

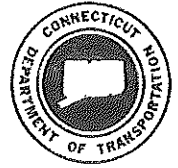
A. Project Related Correspondence

- I. Letter of Project Initiation
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i. Letter of Project Initiation



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

Phone:

September 30, 2014

Ms. Amy D. Jackson-Grove
Division Administrator
Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033

Subject: State Project No. 0063-0644
Federal Aid Project No. 0843(244)
I-84 Hartford Viaduct Environmental Study
Notification of Project Initiation per Section 6002 of SAFETEA-LU

Dear Ms. Jackson-Grove:

The Connecticut Department of Transportation (CTDOT) is initiating the environmental review process as required by the National Environmental Policy Act (NEPA) and in accordance with Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, as codified in 23 U.S.C. §139) for the proposed I-84 viaduct reconstruction project (The I-84 Hartford Project) in Hartford, CT. The proposed project is approximately two miles in length, and is located between the Flatbush Avenue Interchange (Interchange 45) on the west and the I-91 Interchange in downtown Hartford on the east (Interchange 52). A Study Area Map is enclosed for your review. In addition, CTDOT will ensure that all requirements of the Connecticut Environmental Policy Act (CEPA) will be met during the environmental review process and documentation.

Most of I-84 and its interchange ramps in Hartford are elevated on structures known as viaducts, consisting of several long, multi-span bridges high above ground level. The viaduct structures were originally designed for a 50-year service life. Now near or past their anticipated life span, many of the viaducts are classified as either "structurally deficient" or "functionally obsolete" or both. Despite continual maintenance, repairs and capital investment, the condition of the bridges will continue to worsen over time and lead to extensive rehabilitation and ultimately full replacement of many of the bridges.

This section of I-84 was designed in anticipation of 50,000 vehicles per day by the year 1975. Traffic volumes have increased to approximately 175,000 vehicles per day (inclusive of freight movement of goods). Preliminary findings reveal that the existing design does not meet modern interstate standards for current or future traffic demand and is detrimental to the freeway's optimum functionality. Complicating this reconstruction project is that the New

Haven-Hartford-Springfield Amtrak Railroad Line and the CT*fastrak* busway share the same geographic location as the I-84 corridor in downtown Hartford, with I-84 crossing the railroad line and CT*fastrak* at least twice. A study funded by the Federal Transit Administration (FTA) is underway to evaluate the feasibility and costs of relocating a portion of the railroad, which may enhance the reconstruction of I-84. The FTA study will be completed in early 2015.

The purpose of the project, as currently defined in the draft Purpose and Need statement, is to address structural deficiencies; improve traffic operations and safety; and improve mobility on and along the I-84 corridor within the project limits. It will also address pedestrian and bicycle deficiencies along and across the corridor and address other connectivity issues across the I-84 corridor. Preliminary alternatives are being developed at this time.

As the project is in the early phases of alternatives development, the significance of potential impacts in the corridor are not clearly established at this time. Therefore, CTDOT recommends that an Environmental Assessment (EA) be prepared for the proposed project, per 23 CFR §771.115(c), to determine the appropriate environmental document required. The EA will be done in accordance with the agency coordination requirements found in Section 6002 of SAFETEA-LU, which is required for Environmental Impact Statements (EIS). The requirements are being followed so that if significant impacts are identified during the environmental review process, the anticipated participating and cooperating agencies will have already been involved in the project in accordance with the law, resulting in minimal delay to the overall project schedule. If significant impacts are identified during the environmental review process, CTDOT and the Federal Highway Administration (FHWA) will take the necessary procedural steps under NEPA to prepare an EIS.

Pursuant to Section 6002 of SAFETEA-LU, FHWA must serve as the lead federal agency for this project, and CTDOT will serve as a joint lead agency. The responsibilities of the lead agencies are to:

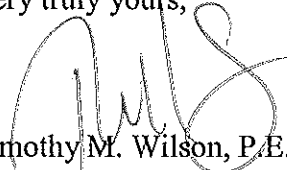
- Establish a list of potentially participating and cooperating agencies and send these agencies invitation letters to participate in the project.
- Develop an Agency Coordination Plan in compliance with Section 6002 of SAFETEA-LU.
- Provide opportunities for public and agency involvement in defining purpose and need and range of alternatives.
- Consult with participating agencies in determining methodologies and the level of detail for the analysis of alternatives.

In addition to the NEPA/CEPA environmental review process, as well as various state permits and approvals, CTDOT anticipates that this project may require Section 4(f) approval and Section 106 determinations of effect from FHWA.

At this time, CTDOT requests FHWA approval to initiate the NEPA process for The I-84 Hartford Project and requests concurrence with CTDOT's recommendation for an EA compliant with Section 6002 of SAFETEA-LU. CTDOT will be the joint lead agency with FHWA and will work with FHWA in finalizing the Agency Coordination Plan and inviting participating and cooperating agencies to be officially involved. CTDOT anticipates holding a public scoping meeting and an agency scoping meeting later this fall or early 2015 to formally introduce the NEPA process to the public and associated federal and state agencies involved with this project. At that time, CTDOT will discuss the draft Purpose and Need Statement and the initial range of alternatives.

If you have questions or would like to discuss this project, please contact Mr. Richard Armstrong, Principal Engineer, at (860) 594-3191.

Very truly yours,



Timothy M. Wilson, P.E.
Manager of Highway Design
Bureau of Engineering and Construction

Enclosure: Study Area Map

ii. Formal Comments by Agency/Organization

Agency Comments

Scoping Comments Received on the I-84 Hartford Project
from Cooperating and Participating Agencies

2/25/15

Connecticut Department of Energy & Environmental Protection



**CONNECTICUT DEPARTMENT OF
ENERGY & ENVIRONMENTAL PROTECTION
OFFICE OF ENVIRONMENTAL REVIEW
79 ELM STREET, HARTFORD, CT 06106-5127**

To: Richard Armstrong - Transportation Principal Engineer
DOT - Bureau of Engineering & Construction, 2800 Berlin Turnpike, Newington

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

Date: February 19, 2015 **E-Mail:** david.fox@ct.gov

Subject: I-84 Hartford Project

The Department of Energy & Environmental Protection (DEEP) is responding to the Notice of Scoping this project to address structural deficiencies, improve traffic operations and safety, and reduce congestion on I-84 in Hartford. The following comments are submitted for your consideration.

The Department concurs with the following statement from the SAFETEA-LU Section 6002 Agency Coordination Plan that summarizes the types of environmental impacts anticipated for this project: “Due to the nature of the project corridor and surrounding areas, the impact parameters of most importance will be those related to the built environment such as air quality, noise, vibration, contamination of soils or water from historic activities, visual resources, cultural resources, economic conditions, and construction activities.”

The Natural Resources Conservation Service’s Soil Survey depicts the entire I-84 corridor as urban land and various types of udorthents. It is highly unlikely that there are any wetlands within the immediate project corridor that would be directly impacted by construction. There are unpaved areas, such as under the Sisson Avenue interchange, where drainage from the highway may have resulted in a watercourse as defined by section 22a-38 (16) of the Connecticut General Statutes (CGS). It is recommended that a certified soil scientist perform a reconnaissance of the corridor in order to determine whether there are any areas which would be regulated as wetlands or watercourses. If the reconnaissance identifies regulated areas, they should be delineated.

As depicted on the Flood Insurance Rate Map, the eastbound I-84 lanes span the 500-year flood zone near the Flatbush Avenue entrance ramp and are adjacent to the 500-year flood zone up to the entrance of the South Branch Park River conduit. The 100-year flood zone is confined to the South Branch Park River channel through this stretch upstream of the conduit. Flood management certification pursuant to section 25-68d of the CGS would not be required unless project encroaches into the 100-year flood zone. The FIRM also contains a note that this area includes “required flood storage area below elevation 51.02 NAVD as noted in formal agreement between the Army Corps of Engineers and the City of Hartford.” The Greater Hartford Flood Control Commission should be contacted concerning potential requirements.

It is assumed that the stormwater runoff from the existing highway is directed to the collection system in the local roadways and/or the Park River conduit without pretreatment. In

either case, it would ultimately discharge to the Connecticut River. The opportunity to introduce treatment measures to the stormwater collection system during reconstruction of the highway should be explored. Constraints involved in this urban location, including soil suitability, space limitations, conflicts with existing utilities, and maintenance requirements, are recognized. However, emerging technologies may provide workable solutions. Because construction will not begin for five years, it is not expected that specific mitigation measures would be identified in the NEPA document; ConnDOT should make a commitment to further explore this issue as design proceeds.

As noted above, air quality impacts will be an important parameter of the environmental assessment for this project. Connecticut is nonattainment for the National Ambient Air Quality Standard (NAAQS) for ozone and attainment/maintenance for both fine particulate matter and carbon dioxide. Connecticut has little recourse for remediating a shortfall in emissions reductions that could be precipitated by an increase in vehicle miles traveled (VMT). As such, Connecticut should be looking for ways to get any reductions possible from projects involving mobile sources in order to meet NAAQS requirements. Measures, such as interchange improvements or providing adequate shoulders, that reduce congestion could also yield air quality benefits. The Department recommends that ConnDOT consult with the Air Planning & Standards Division in developing the modeling for air quality impacts of the projected future traffic flow within and through the corridor. The analysis should include how any additional emissions from increased VMTs will be offset.

In order to mitigate potential air quality impacts from construction activities, the Department typically recommends the following measures. Again, since construction will not begin for 5 years, it would be premature for ConnDOT to commit to a specific strategy during this NEPA review, as technology will likely evolve in the interim. These recommendations are provided for your information. It is expected that ConnDOT would commit to a strategy utilizing appropriate mitigation technology available at the time of construction. This may change during the multi-year construction period, a situation similar to the Connecticut Clean Air Initiative implemented for the I-95 New Haven Harbor Crossing Corridor Improvement Program.

For large construction projects, the Department typically encourages the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

The Department also encourages the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel

particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.

In keeping with the Department's interest in furthering the use of alternate fuels for transportation purposes, we recommend that charging/fueling stations be included at any parking lots that are rebuilt as a result of the project. Increasing the availability of public charging stations will facilitate the introduction of the alternate fuels technology into the state and serve to alleviate the present energy dependence on petroleum and improve air quality.

As construction commences, the discovery of hazardous materials, hazardous waste and/or contaminated soils would be a potential throughout the project corridor. Those alternatives that involve more excavation would obviously increase the likelihood of encountering contamination. It is assumed that ConnDOT's standard procedures, such as preparing Land Use Evaluation reports (Task 110) and Preliminary Evaluation reports (Task 120), would be employed to evaluate the potential to encounter contamination. A site-specific hazardous materials management plan should be developed prior to commencement of construction and a health and safety plan for construction workers should also be prepared. The Department's standard comments concerning construction projects in urban areas are submitted for your information:

Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, that is not hazardous waste, is considered to be special waste. The disposal of special wastes, as defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA), requires written authorization from the Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. In addition, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: [Special Waste Fact Sheet](#).

The Waste Engineering & Enforcement Division has issued a *General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer)* (DEP-SW-GP-001). It establishes a uniform set of environmentally protective management measures for stockpiling soils when they are generated during construction or utility installation projects where contaminated soils are typically managed (held temporarily during characterization procedures to determine a final disposition). Temporary storage of less than 1000 cubic yards of contaminated soils (which are not hazardous waste) at the excavation site does not require registration, provided that activities are conducted in accordance with the applicable conditions of the general permit. Registration is required for on-site storage of more than 1000 cubic yards for more than 45 days or transfer of more than 10 cubic yards off-site. A fact sheet describing the general permit, a copy of the general permit and registration forms are available on-line at: [Soil Management GP](#).

The DEEP Office of Environmental Justice is aware that previous extensive construction projects in urban environments have resulted in displacement of rodents that result in problem infestations in neighboring areas. Prior to construction, a comprehensive survey of the project area should be conducted to identify rodent nesting/feeding areas. An extermination plan should be developed in coordination with municipal health officials to be implemented before construction activities commence. The project site and surrounding areas should be monitored to confirm the success of the extermination efforts and investigate any reports of rodents. Additional extermination efforts should be implemented, as necessary.

The Natural Diversity Data Base has no records of extant species of species listed by the State, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern, that occur within the project corridor. The Natural Diversity Data Base response includes all information regarding critical biological resources available at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Thank you for the opportunity to review this proposal. I look forward to continued involvement in the NEPA process, with DEEP's role as a participating agency. If you have any questions concerning these comments, please contact me.

cc: Jeff Caiola, DEEP/IWRD
Robert Gilmore, DEEP/IWRD
Robert Hannon, DEEP/OPPD

Chris Malik, DEEP/WPSD
Edith Pestana, DEEP/OEJ
Ellen Pierce, DEEP/APSD

U.S. Environmental Protection Agency

Region 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MA 02109-3912

OFFICE OF THE
REGIONAL ADMINISTRATOR

February 20, 2015

Richard Armstrong, Principal Engineer
State of Connecticut Department of Transportation
PO Box 317546
Newington, CT 06131-7546

RE: I-84 Hartford Project, Hartford, CT, Project Scoping Comments

Dear Mr. Armstrong:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we submit the following comments as part of the NEPA scoping process for the Federal Highway Administration (FHWA), Connecticut Department of Transportation (CTDOT) proposed I-84 Hartford Project in Connecticut.

Our comments are based on information from FHWA and CTDOT from a number of sources including a Scoping Initiation Packet, an Agency Coordination Plan, a January 20, 2015 Scoping meeting and conversations with staff at FHWA. According to this information, the objective of the I-84 Hartford Project is to "address the structural deficiencies of the existing highway, improve traffic operations and safety conditions, and reduce congestion on the I-84 mainline in Hartford and its interchanges...." The project information also highlights proposed enhancements to "access, safety and mobility for vehicular traffic, bicycles and pedestrians within the project area." The need for the project is not in question as the bridge spans over the two mile stretch of I-84 in the project area have deteriorated to the point that they require replacement. The state of the roadway infrastructure in combination with the heavy daily vehicle use (the highest of any highway in Connecticut), its location in the heart of Hartford adjacent to environmental justice communities, and the presence of existing rail and CTfastrak corridors makes the project challenging. It also presents a great opportunity, already recognized by both FHWA and CTDOT, to not only improve the functional capacity of I-84, but also to better integrate the highway into the urban environment.

The construction and operation of the I-84 Project could result in a wide range of direct, indirect (secondary) and cumulative impacts to resources that are within EPA's areas of jurisdiction and expertise. Based on our review of available information, we believe the scoping materials identified many of the major environmental concerns that should be fully examined during the NEPA process. The potential for community level impacts from construction and operation of the proposed project is great. In recognition of this, FHWA and CTDOT have embarked on an outreach program to attempt to engage the local community in discussions about the project. EPA believes these efforts will be important throughout the life of the project.

EPA acknowledges the importance of the I-84 project and how a well-designed project could benefit regional transportation and the local community. Development of the project will need to be done in a manner that addresses the environmental concerns articulated in the scoping package and other parts of this letter, and in a manner that complies with any applicable state and federal permits necessary for the project.

Environmental Review Process

The scoping initiation package for the project notes that the significance of potential impacts in the project corridor has not been determined and that an Environmental Assessment (EA) will be prepared to determine whether or not project impacts are significant. If significant impacts are identified, an Environmental Impact Statement (EIS) will be prepared.

Based on project information provided in the scoping package, a recent interagency meeting, and a project area tour hosted by FHWA, we believe that consideration of a number of project factors collectively suggests an EIS as an appropriate NEPA vehicle for the environmental review of the proposed project. EPA does not question the need for the project and, like FHWA and CTDOT, recognizes that likely remedies for the failing infrastructure will be complicated to design, review and implement. In our view, the major factors that signal the need for an EIS include the local and regional importance of this stretch of I-84; implementing a build alternative for a roadway that currently carries 175,000 cars a day without causing significant negative impacts to the local and regional transportation network; project complexity and design challenges/constraints presented by existing rail and busway facilities in the project corridor; and the likelihood of significant impacts on the human environment along the entire two-mile corridor. The project will certainly affect the lives of persons living or working there, including a significant environmental justice population. The scope of interest in the project from local citizens and the business community in the Hartford area may well end up being one of the strongest reasons to prepare an EIS. EPA looks forward to ongoing conversations with FHWA and CTDOT on this issue as the scoping comments are analyzed and preliminary environmental analysis of impacts begins. We appreciate the opportunity to offer scoping comments and preliminary process recommendations early to help the project avoid delays.

Alternatives

Project Alternatives

The Scoping Initiation Packet developed by FHWA and CTDOT identifies the No-Build alternative and three build alternatives focused on rebuilding I-84 through Hartford while also addressing the existing railroad that runs through the project corridor. The No Build alternative will serve as a benchmark against which the impacts of the other build alternatives will be compared. The build alternatives include an Elevated Highway with the railroad on the current alignment; a Lowered Highway with the railroad relocated north of I-84; and, the Tunneled

Highway with the railroad relocated north of I-84. All of the build alternatives would reduce the number of interchanges within the two mile corridor (from a total of 8) with the exact number and locations to be determined. All of the projects are complicated to design and construct and all of the preliminary designs have the potential for significant impacts to residents of the city and the regional transportation network during construction.

EPA supports the preliminary list of alternatives and that each alternative will need to be developed in a collaborative fashion to make sure that the future I-84 alignment works in harmony with the rail and busway through the corridor. EPA also suggests that each alternative be considered in conjunction with other measures to reduce congestion on I-84 and to serve the Hartford area such as mass transit options to remove cars from the roads in the project area and Transportation System Management options (high-occupancy vehicle lanes, ridesharing, etc.). As the alternatives are developed and more is learned about the potential for impacts, it may be advantageous to consider hybrid alternatives. EPA also believes that FHWA and CTDOT should design each alternative with a focus not only on transportation and safety, but also on increased community connections across I-84 and whatever other major goals local citizens establish for the project. Finally, EPA supports elimination of the bypass concept from consideration, since it would not address the project purpose and need, and would provide little traffic relief given that the majority of peak hour trips begin or end in Hartford.

Construction Period Alternatives

Because the construction and staging of the project will be complicated and is likely to cause significant disruption, we suggest that the EIS also contain a comprehensive discussion of Construction Period Alternatives. That analysis should explain how the project will be implemented and measures that can be taken to address potentially significant local impacts and the amount of time the regional transportation network will be compromised. The EIS should draw upon the experience and lessons learned by the FHWA and other DOTs from other major infrastructure replacement projects.

EPA requests the opportunity to remain actively involved in the development, screening and evaluation of alternatives for the project.

I-84 and Adjacent Communities

EPA strongly supports the project goal of better integrating the I-84 project corridor with the urban environment, particularly given the significant environmental justice populations living in close proximity. As noted in our Environmental Justice comments below, we encourage FHWA and CT DOT to explore methods to most effectively involve local residents who may not respond to usual public outreach methods such as newsletters, public meetings, and neighborhood organizations. Much experience has been gained in non-traditional outreach by entities that received HUD Sustainable Communities Regional Planning or Community Challenge Grants, and we suggest consulting with HUD's Connecticut Field Office and the

Capitol Region Council of Governments for suggestions on approaches that have been effective in the region. These extra efforts are important and can help ensure that project input is representative of the populations that will be most affected by the project.

The environmental analysis should address the potential for impacts to adjacent communities and the environment through a comparison of the proposed design and construction alternatives to the No Build. In addition, the analysis should discuss how best to take advantage of opportunities presented by the project to: reduce the physical separation I-84 represents between communities; reconnect neighborhoods; and, reduce noise, air (including particulate pollution), visual and aesthetic impacts.

Successful community outreach and engagement will likely require extensive public meetings and design charrettes to allow the public and business community to identify important issues. FHWA and CTDOT have already begun this process in earnest and a sustained effort will be essential over the course of the project. As part of this process, EPA recommends exploration of opportunities to create “green and complete” street networks in and adjacent to the I-84 corridor as part of the project design. A green and complete street is defined as a street that is safe for all users including pedestrians and bicyclists that also incorporates green infrastructure strategies to manage and treat polluted stormwater runoff. Successful street design can positively impact neighborhoods and promote, rather than hinder, private investment. We also recommend that the alternatives be evaluated for their effectiveness in supporting urban development in the corridor, rather than more suburban growth patterns such as extensive surface parking lots, which currently occupy a significant amount of land area in the corridor.

Green Infrastructure

We encourage FHWA to take advantage of national experience with Green Infrastructure to fully consider opportunities to design the project with underlying Green Infrastructure principles in mind. The analysis should discuss opportunities to improve upon the existing I-84 stormwater management infrastructure with a focus on opportunities for water quality improvement. We recommend that approaches to ‘greening’ the project not stop with stormwater, but extend to use of construction materials or operations and maintenance practices that produce less waste or consume less energy in production. Use of FHWA’s INVEST Sustainable Highways Self-Evaluation Tool could help guide these analyses. Extensive information on Green Infrastructure is also available on EPA’s homepage.

Stormwater Management

Hartford is under a Federal Consent Decree and a State Consent Order for addressing discharges from Combined Sewer Overflows to the Connecticut River. These sanitary sewer overflows are caused by excess stormwater entering the combined stormwater/sewer system. The environmental analysis should address combined sewer overflows and whether the project design

can reduce stormwater flows from the entire project area. As noted above, in addition to traditional stormwater management techniques, we encourage FHWA and CTDOT to explore whether portions of the project, especially improvements at the community and street level associated with the project, can utilize Green Infrastructure and recently developed storm-water best management practices, including structural and nonstructural approaches.

Wetlands and Other Aquatic Resources

The EIS should provide a comprehensive discussion of how the project could affect rivers and streams that traverse the project corridor underground and how the project will be designed to avoid and minimize impacts to these resources. The analysis should also discuss whether opportunities exist for daylighting and restoration of culverted water resources in the project area. Close coordination with the U.S. Army Corps of Engineers will be essential for the portions of the project that will be in proximity to the Park River conduit, a structure under the Corps' jurisdiction.

Spill Prevention

The analysis should include a description of measures to be used to avoid, minimize and address spills during construction and operation of the project. Any Spill Prevention, Containment and Countermeasure Plans (SPCC) developed for the project should include provisions for notification of emergency personnel as appropriate in the event of spills during project construction or operation.

Air Quality

Transportation Conformity

The "I-84 Hartford Project" corridor is approximately two miles in length and encompasses the interchanges and the elevated bridge sections of the highway from as far west as Hamilton Street to the I-91 Interchange in downtown Hartford to the east. This corridor is located within the "Greater Connecticut, CT" marginal ozone nonattainment area for the 2008 ozone standard, thus triggering transportation conformity requirements established at 40 CFR Part 93. A major transportation conformity requirement is that the regional emission analysis for the ozone nonattainment area [performed for the long range transportation plan and transportation improvement program, which includes the final design and scope of the I-84 Hartford Project] demonstrate that both volatile organic compounds (VOCs) emissions and nitrogen oxides (NOx) emissions are less than or equal to the motor vehicle emissions budget(s) established in the applicable implementation plan or implementation plan submission.

In addition, the project corridor falls within the "Hartford-New Britain-Middletown Area" carbon monoxide (CO) attainment area with a limited maintenance plan in place which also triggers transportation conformity requirements, including a carbon monoxide hot spot analysis

found at 40 CFR Section 93.116. We recommend that the project level carbon monoxide hot spot project analysis be completed as part of the NEPA evaluation.

Air Quality and Ventilation of Subsurface and Tunnel Roadways

Four alternatives are currently under consideration for the project: Alternative 1: No-Build; Alternative 2: Elevated Highway; Alternative 3: Lowered Highway, and Alternative 4: Tunneled Highway. The Lowered Highway alternative proposes I-84 at ground level or below grade from Park to Trumbull Street, while the Tunneled Highway tunnels I-84 between Myrtle and Laurel Streets. We point out that boat sections utilized for the Lowered Highway and tunneled roadways create challenges to ensure ambient air quality does not exceed Federal National Ambient Air Quality Standards (NAAQS), and that the air meets all applicable air quality requirements protecting public health and the environment. Drivers and passengers using boat sections, tunnel portal sections, and/or tunnel roadways can be protected by designing ventilation of the facility to meet air quality levels based on air quality standards and expected trip durations (exposure).

Ventilation of the Third Harbor Tunnel and depressed portions of the Central Artery in Boston, Massachusetts utilized full transverse ventilation and mechanical ventilation in road tunnels using jet fans. Based on our experience with that project, it is likely that the I-84 project will require extensive air quality modeling, wind tunnel analyses, and post construction air quality monitoring to ensure protective air quality in the tunnel portal areas, the actual tunnel roadway, and downwind of any roadway ventilation stack(s) associated with the Tunneled Highway. Because tunnel ventilation systems are not regulated as stationary sources subject to Prevention of Significant Deterioration (PSD) or to New Source Review (NSR) permitting requirements of the Clean Air Act (CAA), new state regulations may be required to protect air quality in the tunnel environment and downwind of vent structures. The Central Artery/Third Harbor Tunnel Project (CA/T) led Massachusetts to promulgate a new State regulation entitled "Certification of Tunnel Ventilation Systems in the Metropolitan Boston Air Pollution Control District," found at 310 CMR 7.38 for tunnel ventilation systems for highway projects in the Metropolitan Boston Air Pollution Control District. The Connecticut Department of Energy and Environment may wish to develop similar regulations to ensure protective air quality in the tunnel and downwind of any ventilation structures.

We encourage the project sponsors to explore the use of Intelligent Transportation Systems (ITS) for all of the build alternatives, especially the Tunneled Highway, to establish a network of data collection points to manage traffic and incidents, as well as such things as ventilation, lighting, security, and air quality. This data collection and closed circuit television monitoring could assess traffic speed, vehicle volume, congestion, and air quality levels to feed back to a central traffic monitoring center. This data would assist in managing tunnel ventilation system, traffic flow, and incident management to protect the public and ensure best traffic flow on I-84 in downtown Hartford.

With respect to monitoring tunnel air quality, MA DEP has devised innovative approaches of using continuously monitored traffic data as a surrogate for non-methane hydrocarbons

(NMHC), as well as using continuously monitored CO emission levels as a surrogate to predict nitrous oxide (NO) and nitrogen oxides (NO_x) concentrations. Based on the results of continuous CO, NO and NO_x monitoring in the Ted Williams Tunnel, the CA/T Project utilized a statistical approach to explore the possibility of using continuously monitored CO emission levels as a surrogate to predict NO and NO_x concentrations in the tunnel environment. The results of their correlation analysis indicate a moderate to strong correlation between CO and NO and CO and NO_x. This correlation analysis was based on data sets representing different seasons, ventilation zones, and direction of traffic. Pollutant monitoring data collected since the Ted Williams Tunnel's "early opening phase" continues to support the CO/NO_x relationship and their statistical approach to determining NO_x emissions based on measured CO concentrations. Connecticut may also wish to monitor CO in the proposed tunnel section as a surrogate to predict nitrous oxide and nitrogen oxides concentrations.

EPA's Motor Vehicle Emission Model

On October 7, 2014, (70 FR 60343), EPA published the notice of availability for the MOVES2014 (Motor Vehicle Emissions Simulator Model) for SIPs and Transportation Conformity. <http://www.gpo.gov/fdsys/pkg/FR-2014-10-07/pdf/2014-23258.pdf>. MOVES2014 is the latest state-of-the art upgrade to EPA's modeling tools for estimating emissions from cars, trucks, buses, and motorcycles, based on the latest data and regulations. Air quality modeling not substantially underway for the project should use the MOVES2014 model. There is currently a two-year transportation conformity grace period that ends on October 7, 2016, after which MOVES2014 is required to be used for new transportation conformity analyses. Additional guidance is available in "EPA's Policy Guidance on the Use of MOVES2014 and Subsequent Minor Revisions for State Implementation Plan Development, Transportation Conformity, and Other Purposes," (EPA-420-B-14-008, July 2014). <http://www.epa.gov/otaq/models/moves/documents/420b14008.pdf>. This document describes how and when to use the MOVES2014 for SIP development, transportation conformity, general conformity, and other purposes.

The recently released "MOVES2014 Technical Guidance: Using MOVES to Prepare Emission Inventories for State Implementation Plans and Transportation Conformity," (EPA-420-B-15-007, January 2015) provides guidance on appropriate input assumptions and sources of data for the use of MOVES2014 in regional emissions analyses for transportation conformity purposes. <http://www.epa.gov/otaq/models/moves/documents/420b15007.pdf>.

Construction Period Emissions

Reducing emissions from diesel engines is one of the most important public health challenges facing the country. EPA has finalized a number of clean fuel and vehicle emissions standards that will lead to dramatic emission reductions in new diesel-powered engines. Included within these rulemakings are cleaner fuel requirements, such as the use of ultra-low sulfur diesel, which will provide immediate emissions reductions in both new and older diesel engines. However, even with more stringent heavy-duty highway and nonroad engine standards set to take effect over the next decade, millions of diesel engines already in use will continue to emit excessive amounts of diesel exhaust and contribute to serious public health problems.

Potential emissions from older diesel engines include high levels of particulate matter, hydrocarbons and carbon monoxide. These emissions can be controlled through 1) strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment; and 2) the use of advanced pollution control technology such as diesel oxidation catalysts or particulate filters that can be installed on the exhaust of the diesel engine. Retrofits are cost effective and efficient means to control emissions and they have been successfully applied to many diesel engines across the country.

Retrofit technologies may include EPA verified emission control technologies and fuels and CARB-verified emission control technologies. Lists of these diesel exhaust control technologies can be accessed at <http://epa.gov/cleandiesel/verification/verif-list.htm>. In addition, the Northeast Diesel Collaborative has prepared model construction specifications to assist in developing contract specifications that would require construction equipment to be retrofitted with control devices and use clean fuels in order to reduce diesel emissions. The model construction specifications can be found on the Northeast Diesel Collaborative web site at: <http://northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>.

We encourage FHWA and CTDOT to use the environmental analysis in the EIS to discuss how a firm commitment to implementing these and other measures can help reduce and minimize the air quality impacts to the local community from construction of the proposed project. EPA is willing to assist in that effort.

Please feel free to contact Donald Cooke of EPA's Office of Ecosystem Air Quality Unit at 617-918-1668 for more information regarding the air quality analysis for the project.

Greenhouse Gas Emissions and Climate Change

On December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. The revised draft guidance supersedes the draft greenhouse gas and climate change guidance released by CEQ in February 2010. This guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.

“CEQ recognizes that many agency NEPA analyses to date have concluded that GHG emissions from an individual agency action will have small, if any, potential climate change effects. Government action occurs incrementally, program-by-program and step-by-step, and climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, including decisions made by the government. Therefore, the statement that emissions from a government action or approval represents only a small fraction of global emissions is more a statement about the nature of climate change

challenge, and is not an appropriate basis for deciding whether to consider climate impacts under NEPA. Moreover, these comparisons are not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigations.”

The revised draft guidance suggests that, if an agency determines that evaluating the effects of GHG emissions would not be useful in the decision making process and to the public in the process of distinguishing between the proposed action, alternatives and mitigations, the agency should document the rationale for that determination.

FHWA and CTDOT efforts to consider climate change should also include efforts to describe how the proposed project alternatives are designed to be resilient in the context of potential climate change related impacts in the project area. The 2014 DOT Climate Adaptation Plan commits USDOT to a series of planning and asset management actions to ensure:

“Federal transportation investment decisions address potential climate impacts in statewide and metropolitan transportation planning and project development processes as appropriate in order to protect federal investments. Through such actions, transportation systems will gradually become better prepared for future climate shifts.”

In addition, FHWA has developed an Adaptation Framework to assist with the consideration of climate change impacts during decision-making and has recently released FHWA Order 5520 titled, “Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events,” which provides further direction regarding analysis of climate change related impacts

(http://www.fhwa.dot.gov/environment/climate_change/adaptation/adaptation_framework/)
(<http://www.fhwa.dot.gov/legregs/directives/orders/5520.cfm>).

Environmental Justice

EPA New England has a strong commitment to promote the principles of environmental justice that are outlined in Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. According to the Executive Order, “Each Federal Agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by NEPA. Mitigation measures outlined or analyzed in an environmental assessment, environmental impact statement, or record of decision, whenever feasible, should address significant and adverse environmental impacts of proposed Federal actions on minority communities and low-income communities.”

Given that the project corridor goes through the heart of a number of communities with low income and minority populations, it will be important for FHWA and CTDOT to fully consider environmental justice issues as it works to prepare the EA/EIS for the project. EPA defines environmental justice to mean the fair treatment of people of all races, cultures, and incomes

with respect to the development, implementation, and enforcement of environmental laws and policies, and their meaningful involvement in the decision-making process of the government. Based on our informal coordination with FHWA since the start of project scoping, we learned that CTDOT has already initiated comprehensive outreach efforts to engage EJ communities in the project area. That work has included efforts to: make the project website bilingual; produce all newsletters, fact sheets and e-bulletins in English and Spanish; provide translator services for public information meetings/hearings; advertise meetings in a local Spanish weekly newsletter; invite local neighborhood groups and other relevant groups to project meetings and to use those groups to disseminate project information more broadly. It is our understanding that the outreach also includes provisions to make the website accessible for the visually impaired. We applaud these measures and note that the combination of these traditional and non-traditional communication techniques should help better connect the project to the impacted communities in the project corridor. We also recommend that FHWA and CTDOT consider the Council on Environmental Quality's (CEQ) "Environmental Justice Guidance under the National Environmental Policy Act" (December 1997) and consult CEQ's posting of Federal agency resources on environmental justice on its website at: http://ceq.hss.doe.gov/nepa_information/agency_resources.html.

The environmental analysis should also specifically discuss how the project will be designed to avoid, minimize and mitigate impacts to the communities bordering the I-84 project corridor during both construction and operation. Engagement with the local community will be an important part of the development of that part of the analysis.

EPA is willing to assist FHWA and CTDOT to help improve the outreach to affected EJ populations along the project alignment. Please contact Deborah Brown of EPA's Environmental Justice program at 617-918-1706 for additional assistance with this outreach.

Noise

The environmental analysis should identify traffic noise impacts to surrounding communities for each alternative and identify design and mitigation measures to address those impacts.

Children's Health Issues

Executive Order 13045 on Children's Health and Safety directs that each Federal agency shall make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and shall ensure that its policies, programs, activities, and standards address these risks.¹ Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks. Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting

¹ http://yosemite.epa.gov/ochp/ochpweb.nsf/content/whatwe_executiv.htm

their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed.

Based on current EPA policy and guidance, an analysis of impacts to children from construction and operation of the proposed project should be included in a NEPA analysis if there is a possibility of disproportionate impact on children related to the proposed action.² In this case the comparison of the project alternatives to a baseline will be helpful, as it may show opportunities for improvements to traffic flow through the city and resulting air quality benefits that could also protect the health of children. EPA views childhood as a sequence of lifestages. Therefore, exposures to children at each lifestage, as well as pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

Because children can be more susceptible to noise levels, mobile source air pollution, construction dust, and the chemicals associated with building and construction materials, we recommend that the NEPA analysis specifically address the potential direct, indirect, and cumulative impacts of the proposed project on children's health, including consideration of prenatal exposures (exposures that may be experienced by pregnant women).

The analysis should characterize and address children's exposures and susceptibilities to pollutants of concern, including the following:

- **Identification of pollutants and sources of concern**
- **Exposure Assessment:** Describe demographics of affected neighborhoods/populations/communities and focus exposure assessments on schools, recreation areas, childcare centers, parks, and residential areas in close proximity to the proposed project, and other areas of apparent frequent and/or prolonged exposure.
- **Baseline health conditions:** Consider obtaining and including available relevant health data/records for the neighborhoods/populations/communities of concern.
- **Respiratory Impacts/Asthma:** Consider data on existing asthma rates and asthma severity among children and the general community living, working, playing, and attending school and daycare near the project site. To the extent feasible, identify impacts of the project on asthma rates and severity in children near the project site and quantify associated costs.
- **Noise Impacts:** Consider impacts from noise on health and learning, especially near homes, schools and daycare centers.
- **Impacts Regarding Obesity Factors:** Consider potential impacts that could influence childhood obesity factors, such as impacts on school commutes, and on the accessibility of neighborhood parks, green spaces, and recreation areas.

²<http://www.epa.gov/compliance/resources/policies/nepa/children-health-risks-pg.pdf>

- **Impacts from Air Pollutant Emissions:** Consider exposure and impacts to children from mobile source air pollutants, including proximity to transportation corridors, transportation hubs, and ports, and project construction emissions. Combine these with other area sources/baseline air quality.
- **Impacts from Other Chemical or Physical Exposures:** Consider impacts to children from other site activities, such as pesticide application, dust caused by construction, increased exposure to contaminated soils, demolition, etc.

Please contact Kathleen Nagle of EPA New England's Children's Environmental Health Coordinator at 617-918-1985 with any questions regarding the consideration of Children's Health issues.

Analysis of Indirect and Cumulative Impacts

The Council on Environmental Quality's (CEQ) NEPA regulations require EISs to evaluate growth-inducing changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems that result from the proposed action and alternatives. The regulations define indirect (sometimes called 'secondary') effects as those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." The regulations state that impacts include ecological, aesthetic, historical, cultural, economic, social, or health impacts, whether direct, indirect, or cumulative. The CEQ NEPA regulations define cumulative impacts as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." We are willing to assist FHWA and CTDOT to develop a strategy to address the cumulative impacts of the proposed project.

Thank you for the opportunity to provide scoping comments on the I-84 Hartford Project. We would be happy to serve as a participating agency for the purposes of preparing the EA and/or EIS, and in that role review draft documents and attend coordination meetings as appropriate and as resources permit. We believe the issues we have identified can be fully addressed in the NEPA process and we are willing to work with your agency to develop a strategy to achieve that goal. Should you have any questions or wish to discuss our concerns, please contact me at 617/918-1025.

Sincerely,



Timothy L. Timmermann
Associate Director, Office of Environmental Review

Connecticut Department of Economic and Community Development
State Historic Preservation Office



Department of Economic and
Community Development

Connecticut
still revolutionary

January 8, 2015

Mr. Richard B. Armstrong
Bureau of Engineering and Construction
Department of Transportation
2800 Berlin Turnpike
P.O. Box 317546
Newington, CT 06131-7546

Subject: State Project No. 0063-0644, Federal Aid Project No. 0843(244)
I-84 Viaduct Reconstruction Project
Hartford, Connecticut

Dear Mr. Armstrong,

The State Historic Preservation Office (SHPO) has reviewed the referenced project in response to your request for our comments regarding potential effects to historic properties, dated December 12, 2014. The Connecticut Department of Transportation (CTDOT) is considering the rehabilitation, reconstruction, or replacement of Interstate 84 (I-84) through downtown Hartford. This office recognizes the purpose and need of the proposed project and we accept the invitation to be a cooperating agency during the life of the project because of the potential impacts to historic properties. SHPO understands that four preliminary design alternatives are under consideration and that public outreach has been initiated. This office appreciates the opportunity to comment on the proposed project at this early stage of planning.

The Study Area identified in the Scoping document contains at least two previously recorded archeological sites, more than 40 properties individually listed on the National Register of Historic Places (NRHP), and 18 historic districts listed on the NRHP. Because the final project plans are not known, it is not possible to determine the direct or indirect effects of the proposed project on historic properties. Of the build alternatives, SHPO considers Preliminary Alternative 2 to have the fewest foreseeable impacts to historic resources. However, Preliminary Alternatives 3 and 4 may offer expanded opportunities for building use and potential preservation. As a result, this office looks forward to additional consultation regarding this project as it moves forward.

These comments are provided in accordance with the National Environmental Policy Act, the Connecticut Environmental Policy Act, and Section 106 of the National Historic Preservation Act, as amended. For additional information, please contact Catherine Labadia, Environmental Reviewer, at (860) 256-2764 or catherine.labadia@ct.gov.

Sincerely,

Mary B. Dunne
Deputy State Historic Preservation Officer

cc: Mark Alexander, OEP

U.S. Department of Housing and Urban Development
Hartford Field Office

From: Piacentini, Suzanne [<mailto:suzanne.piacentini@hud.gov>]

Sent: Wednesday, February 18, 2015 3:42 PM

To: Herrell, Michelle (FHWA)

Cc: Rodriguez, Carmen L; Held, Beth A; Kanaan, Gregory R

Subject: HUD Comments

Michelle- we have some preliminary comments on the scoping package which are right now in two programmatic areas at HUD – Environmental and Fair Housing & Equal Opportunity. As the scope becomes more defined other program areas may be included in the review.

Environmental

- Until the specific scope/alternatives are provided including identification of impacted properties we cannot determine the level of environmental impact but will continue to comment as plans become better defined

Fair Housing & Equal Opportunity (FH &EO)

- HUD is committed to ensuring that the largely minority population of the City is not adversely affected by the project. As you may be aware, the City of Hartford is a minority-majority City, with a population of 124,000 people consisting of 29.8% White Non-Hispanic, 38.7% African American, and 43.4% Hispanic residents. The project corridor spans the entire width of the City, from East to West, and the highway itself cuts through or abuts seven low-mod income census tracts (5021, 5029, 5031, 5041, 5043, 5049, and 5246). With the exception of census tract 5021, each of the census tracts are majority-minority, comprised mostly of African-American, Hispanic, and Asian residents. That means the proposed construction could directly affect nearly 22,000 Hartford residents, most of whom are minorities.
- Because of its location, the changes to I-84 will have a much greater effect on the low-income minority populations of the City.
- HUD is concerned that the potential for the project to adversely affect the already limited affordable housing options for minorities is concerning.
- HUD's Division of FHEO will provide assistance and guidance as this project moves closer to fruition and the scope and impacted properties are determined

We look forward to working with you on this project. Please let us know if you need anything additional
- Suzanne



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

JAN 7 2015

Amy Jackson-Grove
Connecticut Division Administrator
U.S. DOT Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033

Re: Participating and Cooperating Agency Invitation for the I-84 Viaduct Reconstruction Project in Hartford, Connecticut (FHWA Reference Number HPR-CT/FAPN: 0843(244))

Dear Ms. Jackson-Grove:

Thank you for your letter dated December 11, 2014, in which the Federal Highway Administration (FHWA)-Connecticut Division invited the Federal Railroad Administration (FRA) to be a Cooperating Agency in the National Environmental Policy Act (NEPA) process and a Participating Agency pursuant to Section 6002 of SAFETEA-LU for the proposed I-84 Viaduct Reconstruction Project located in Hartford, Connecticut. By way of this letter, FRA accepts the invitation to be a Cooperating and Participating Agency.

FRA understands its Cooperating and Participating Agency responsibilities as outlined in your letter, and provides the following comments regarding the FHWA Scoping Initiation Packet for the I-84 Hartford Project (December 2014).

FRA is concerned that FHWA and Connecticut Department of Transportation (ConnDOT) give careful consideration in the development of alternatives to critical functional aspects of the rail line and station in Hartford. Any alternative that would involve relocation of the existing railroad alignment, including relocation of railroad structures such as Hartford Union Station, must address the following:

- How the relocated station will maintain connectivity with the downtown area;
- The speed(s) at which trains could operate along the new railroad alignment;
- Whether the realigned railroad and station will be constructed at-grade or as elevated structures;
- The appropriate number of new tracks and new platforms to meet future rail service needs;
- The track alignment geometry through the relocated station;
- The platform configuration that can be accommodated by the relocated station (e.g., side platforms or an island platform);
- How the appropriate platform height, length, and width can be accommodated at the relocated station;

- How sufficient transit and pedestrian access will be provided at the relocated station (e.g., passenger drop-off/pick-up, taxicab access, local bus service, sidewalks);
- How sufficient parking will be available at the relocated station; and
- How the realigned railroad and relocated station preserves the Strategic Rail Corridor Network (STRACNET) designation issued by the Department of Defense for this rail line (i.e., the requirement that the railroad be able to accommodate oversized loads); this also includes ensuring no new highway infrastructure impacts STRACNET clearance requirements along the rail line.

For any alternative in which Hartford Union Station would not be relocated, consideration must be given to how the I-84 Hartford Project will allow for the eventual replacement of the viaduct that currently supports the station, which is nearing the end of its useful life. The involvement of the National Railroad Passenger Corporation (Amtrak), as the owner of the railroad through Hartford, will be important for the project planning and decision-making process, including the development of alternatives and consideration of the disposition of the existing viaduct and station.

Finally, consideration must be given to potential impacts to historic properties pursuant to the National Historic Preservation Act. Hartford Union Station was listed on the National Register of Historic Places (NRHP) in 1975, and the Connecticut portion of the New Haven-Hartford-Springfield rail corridor, including numerous contributing bridges and culverts, was determined eligible for listing on the NRHP as a linear historic district in 2012 as part of the New Haven-Hartford-Springfield High-Speed Intercity Passenger Rail Project.

Thank you for the opportunity to participate in this project. Please direct any future correspondence or requests regarding this project to Laura Shick of my staff. She can be reached by email at laura.shick@dot.gov or by phone at (202) 366-0340.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Valenstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Valenstein
Division Chief, Environmental and Corridor Planning

cc: Trevor Gibson, FRA
Laura Shick, FRA
Michelle Herrell, FHWA

Narragansett Indian Tribal Historic Preservation Office

From: NITHPO Harris [<mailto:dhnithpo@gmail.com>]
Sent: Friday, February 20, 2015 12:08 AM
To: Armstrong, Richard B; david.w.nardone@dot.gov; JB -JOHN BROWN
Cc: michelle.herrell@dot.gov
Subject: I-84 Hartford Project

Greetings, Mr. Armstrong:

Please be advised that the Narragansett Indian Tribal Historic Preservation Office (NITHPO) requests consultation regarding original Tribal cultural land surfaces within this undertaking's APE. These land surfaces may lie beneath fill layers that may have been added within the past three hundred years. NITHPO looks forward to working with you and the CT-SHPO in developing protocols for addressing this concern.

Doug Harris, Preservationist for Ceremonial Landscapes / Deputy THPO
Narragansett Indian Tribal Historic Preservation Office (NITHPO)
(401) 474-5907 <dhnithpo@gmail.com>

State of Connecticut Department of Public Health

(Not a Cooperating or Participating Agency, but included for your review.)

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner



Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

February 20, 2015

Richard Armstrong
Transportation Principal Engineer
Connecticut Department of Transportation
Bureau of Engineering and Construction
PO Box 317546
Newington, CT 06131-7546

Re: Notice of Scoping for I-84 Hartford Project

Dear Mr. Armstrong:

The Department of Public Health Drinking Water Section's (DWS) Source Assessment and Protection Unit has reviewed the above Notice of Scoping. The subject project is not in a public drinking water supply source water area, but it is within the public water supply service area of The Metropolitan District Commission (MDC, PWSID #CT0640011). The Department of Transportation should consult with the MDC on the locations of water distribution mains and coordinate with the MDC on potential relocation or replacement of water distribution mains within the project area.

If you have any questions regarding these comments, please call Pat Bisacky of this office at (860)509-7333.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric McPhee", with a long horizontal flourish extending to the right.

Eric McPhee
Supervising Environmental Analyst
Drinking Water Section

Cc: Susan Negrelli, P. E. and David Banker, P.E., the MDC
Tom Chyra, P. E., DPH DWS



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