TO: Richard Miller  
Director, Office of Environmental Policy  
University of Connecticut

FROM: Benjamin Barnes, Secretary  
Office of Policy and Management

DATE: August 3, 2016

SUBJECT: Environmental Impact Evaluation (EIE) for South Campus Development, University of Connecticut, Storrs and Record of Decision (ROD)

Based on a review of the subject EIE and related documentation conducted pursuant to C.G.S. Sec. 22a-1e, I am herewith advising you of my finding that this evaluation satisfies the requirements of the Connecticut Environmental Policy Act (CEPA), subject to the contingency described below.

The EIE prepared for the South Campus Development included, ultimately, a modest addition to the School of Fine Arts building and demolition of the historic Brown Houses, once the proposed Honors Residence Hall was removed from consideration. A Memorandum of Understanding (MOU) between UConn and the State Historic Preservation Office (SHPO) was signed in June 2016, and addresses the proposed demolition of the Brown Houses. OPM agrees that SHPO is the appropriate agency to establish conditions or mitigation, relative to demolition of historic structures, and encourages UConn to make the MOU available to the public alongside the other South Campus EIE documents on UConn's website.

The MOU says "UCONN proposes to demolish the Brown Houses ... to facilitate future development" and indicates that SHPO does not object to the proposed demolition of the Brown Houses, subject to the three mitigation measures "required to off-set the historic loss." OPM accepts SHPO's judgment that those measures would be appropriate mitigation.

The removal of the proposed Honors Residence Hall from consideration in this EIE appears to have reduced some of the pressure to demolish the Brown Houses at this time. Furthermore, development of a new South Campus Commons, or open space area, at the site of the Brown Houses is not adequate justification for the demolition of those houses prior to completing mitigation measures specified in the UConn-SHPO MOU.

Therefore, OPM's approval of the subject EIE/ROD is contingent on UConn not commencing demolition of the Brown Houses until the required mitigation has been completed.
Finally, please note that the divergence between UConn’s actual construction plans and the phasing established in last year’s Campus Master Plan has complicated OPM’s review of this EIE, and likely presents an even greater challenge for members of the public. To avoid segmentation between separate environmental reviews and to ensure that future environmental review documents accurately reflect cumulative impacts, UConn should consult with OPM and DEEP to establish formal procedures for routinely documenting its progress in implementing the Campus Master Plan and any updates to information contained therein.

Please contact Bruce Wittchen (860-418-6323) if there are any questions with regard to this finding.

cc: Paul Potamianos, OPM
    Dan Morley, OPM
    Robert Klee, DEEP
    Karl Wagener, CEQ