

October 25, 2017

Andy Fesenmeyer

Project Manager

Rt. 7-15 Norwalk

CTDOT

Dear Mr. Fesenmeyer

I am writing on behalf of the Norwalk River Watershed Association, a non-profit organization that represents over 800 households and works to protect water quality and wildlife habitat in the Norwalk River watershed. We were impressed with the level of diligence and thought that has been given to this project as presented at the scoping presentation on October 17, and we wish you continued success.

We realize public scoping is the initial stage of the project, and we appreciate the chance to offer input at this point before the environmental assessment has been done. Any work in the proposed design areas will impact the Norwalk River. Our main concerns are the effects on water quality and wildlife habitat of any construction done in or near the river and wetlands and of storm water runoff both during the construction process and after. We are especially concerned about threats to water quality because this is one of several large projects planned in the watershed.

The Norwalk River is listed as a class B river, an impaired waterway, and the DOT has in the past used that classification as the starting point for claiming that no impact in water quality will result from its projects. While parts of the river are indeed impaired, it is important to understand that organizations like NRWA, Harbor Watch, Trout Unlimited and Norwalk River Watershed Initiative have been working for the last 20 years to improve water quality in the river. These groups use as a guide the Norwalk River Watershed Action Plan, which was written in 1998 and updated in 2011. Three years ago, these organizations and their volunteers were credited by the EPA with helping to remove two sections of the river from the impaired waterways list. As the EPA report stated, “the watershed approach has improved the river.”

The EPA report credits our work, citing how, “Countless volunteers have participated in efforts to monitor water quality, identify pollution problems on the river, restore streamside buffers, and enhance trails and access points.” The goal of our work has been and remains to remove more sections of the river from the Impaired Waterways list and to protect the quality of the water entering Long Island Sound. This year alone, NRWA engaged close to 200 volunteers to help improve the watershed. Harbor Watch and Trout Unlimited are larger organizations with even more employees, interns and volunteers. Harbor Watch has been testing water quality in the river consistently for almost 20 years, so our community has a wealth of data to use as a guide for our work to protect the river as a resource. Additional challenges to water quality from construction or from added storm water runoff from new highway projects in the watershed threaten to set back our community’s efforts to improve water quality.

In light of the number of projects in our area, NRWA requests that the CTDOT use a third party independent assessor to conduct its Environmental Assessment/Environmental Impact Evaluation (EA/EIE) and that it include an assessment of the cumulative effects, including increases in storm water runoff, of the multiple CTDOT projects planned for the Norwalk River Watershed. The combined effect of the current planned projects makes rigorous storm water controls for each one all the more imperative. The current Walk Bridge EA/EIE does not go far enough in assessing impact; it simply states no permanent impact on water quality. The added storm water outlets will result in increased runoff. It is hard to believe there will be no impact. The current EIE states that to manage runoff, “drainage swales may be used and closed deck approach will be used where applicable.” We hope the EIE for the Route 7/15 Interchange will include specific plans for capturing runoff as well as a detailed assessment of damage to water quality, wetlands, wildlife, wildlife habitat and aquatic life during construction and from storm water runoff.

We also request that the DOT add requirements for capturing runoff to its plans for the restoration of the Walk Bridge and the Yankee Doodle Bridge. The repair of these bridges and the Route 7 interchange alone present the CTDOT with a unique opportunity to reduce the amount of contaminated storm water runoff that enters the Norwalk River, the harbor, and the Sound. A concrete commitment to capturing runoff from bridges and highways that pass near wetlands and watercourses should be the baseline from which the CTDOT is working. Our community is owed these protections to water quality at the very least since it is bearing the brunt of the negative impact of years of construction on multiple projects. The Route 7/15 EIE should include consideration of the permanent damage that years of temporary impact from construction can cause to water quality, wetlands and aquatic life.

We ask the CTDOT to clearly specify mitigation measures and erosion and sedimentation controls for any listed construction activities in and over the water and wetlands. We would like the DOT to provide information on what best management practices will be employed and who will oversee adherence to those standards, including who will test water quality during construction and how often. NRWA asks CTDOT to consult with Harbor Watch, which currently conducts regular water quality testing in the river, about how best to monitor impact during construction and protect wildlife habitat and water quality as well as the best ways to carry out mitigation efforts during and after construction.

We hope to see very specific plans for protections to the wetlands and the river during construction. NRWA has had concerns about the effects on water quality and the severe damage to the riverbank at the site of repair work on the Perry Avenue Bridge. Protections of the riverbank vegetation and attempts to avoid compacting the soil are important to protecting the river from harmful runoff both during construction and after. Neither has been done at the Perry Avenue site.

We hope the DOT will take this opportunity to improve the methods it uses to safeguard the river and surrounding wildlife habitat during construction projects. We also hope this project will be used as an opportunity to improve the mechanisms for capturing runoff from the intersection before it enters wetlands. We were very disappointed that such improvements were not included in the plans to repair the Yankee Doodle Bridge.

Finally, NRWA fully supports the plans for including pedestrian and bike connections to the Norwalk River Valley Trail (NRVT). We see the NRVT as a vital way to connect the community to the Norwalk River and natural resources our community has to offer.

Thank you for considering NRWA’s concerns.

Sincerely,

Louise Washer, President

Norwalk River Watershed Association