

December 2, 2016

Mr. Mark W. Alexander
Transportation Assistant
Planning Director
2800 Berlin Turnpike
Newington, CT 06111

Dear Mr. Alexander,

I am writing to comment on the plans for the Walk Bridge Replacement Project on behalf of the Norwalk River Watershed Association (NRWA). Our main concern is stormwater runoff and water quality and the opportunity the DOT is missing to help protect water quality by improving the mechanisms for capturing runoff as part of this project and the Yankee Doodle Bridge repair project.

NRWA requests that the CTDOT conduct a new EA/EIE by a third party that offers a more detailed assessment of damage to water quality, wetlands, wildlife, wildlife habitat and aquatic life during construction and from stormwater runoff from the new bridge and includes more specific information regarding plans for mitigation of impact. NRWA requests that the DOT add specific plans to capture and filter all runoff from the Walk Bridge and the Yankee Doodle Bridge as part of the two projects to repair these two bridges. We also support a reconsideration of the plan to restore and repair the old Walk bridge instead of building a new movable bridge in order to minimize damage to water quality and wetlands.

Though the Norwalk River is listed as a class B river, an impaired waterway, and the DOT is using that classification as the starting point for claiming that no impact in water quality will result from this project, organizations like the NRWA and Harbor Watch have been working for the last 20 years to improve water quality. Two years ago, NRWA along with other like-minded organizations were credited by the EPA with helping to remove two sections of the river from the impaired waterways list. The goal of our work for the last two decades has been and remains to remove more sections of the river from this list and to protect the quality of the water entering Long Island Sound. We cannot tolerate additional challenges to water quality from construction or from additional stormwater runoff from a new bridge.

Any improvement to infrastructure should include a reduction in runoff entering the river. This project presents a great opportunity for making real progress, for improving the health of the river and the Sound. Our community is owed these

protections to water quality and habitat since it is bearing the brunt of the negative impacts of 4 years of construction. The current EA/EIE does not go far enough in assessing impact; it simply states no permanent impact on water quality. The added stormwater 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." NRWA requests more specific plans for capturing runoff and how they would compare to the possibility of capturing runoff with a restoration/repair option instead of a build option.

NRWA also requests that the DOT add to its plans for the restoration of the Yankee Doodle Bridge north of Walk Bridge requirements for capturing runoff. The CTDOT has a unique opportunity now to reduce the amount of contaminated stormwater runoff that enters the Norwalk River, the harbor and the Sound during the repair of these two bridges. A concrete commitment to capturing runoff from these two bridges should be the baseline from which the CTDOT is working.

NRWA requests that a third party EA consider the cumulative impact this project will have on water quality, aquatic life, wildlife and wildlife habitat in conjunction with other projects affecting the Norwalk River Watershed at the same time, including the Yankee Doodle Bridge repair project, the Danbury Plan, the Route 7/15 interchange project and all others that affect the Norwalk River Watershed. Twenty other DOT projects are going on including other large scale projects nearby.

NRWA requests a reconsideration of the option to repair and restore the existing bridge including consideration of the option to make this bridge a fixed bridge. NRWA asks CTDOT to consider that the bridge may no longer need to be movable since traffic on the upper Norwalk is down 30 percent since 2008, and the EA/EIE shows that only one sailboat business would be affected by a fixed bridge option. NRWA asks that the environmental assessment be revised to show actual use and reassess whether we really need a movable bridge. NRWA asks for an evaluation of whether the restoring and repairing of the old bridge, perhaps including welding it closed, will create the lowest environmental impact and fulfill the purpose of the project

NRWA also questions the need for the dredging of a wider navigation channel. Industrial use of the river is in decline and an appreciation of the beauty and wildlife associated with the river is growing. Again we advocate for a reconsideration of restoration and repair of the current bridge and a minimizing of dredging instead of replacement and additional dredging. If channel dredging is conducted, NRWA requests that instead of dredging when containment is not necessary from November to January, that containment be used.

If the high towers are removed by CTDOT, the EIE states that Eversource Energy will be responsible for relocating its lines and the associated environmental evaluations and permits. In order to ensure that the plans for this project are

forward-looking and that the environmental impacts are fully explored, NRWA requests that Eversource submit its EIE now for the public to consider in conjunction with the CTDOT EIE.

The NRWA believes it is vital for CTDOT to provide a third party environmental assessment of how long the construction will take. The longer the disruption, the greater the impact to wildlife, aquatic life and water quality. We ask the DOT to recommend an expedited construction process. NRWA requests a priority time frame. The new EIE should include a consideration of the permanent damage that four years of temporary impact can cause.

NRWA asks CTDOT to consult with Harbor Watch, which currently tests water quality in the river regularly, and the Maritime Aquarium about how best to monitor impact during construction and protect wildlife habitat and water quality and the best way to carry out mitigation efforts during and after construction.

We also want CTDOT to confirm that a pedestrian and bike pathway connecting of the two trails segments, the Harbor Loop and NRVT, will be included in the plans.

We ask DOT to clarify specific mitigation measures and erosion and sedimentation controls for the listed construction activities in and over the water. We would like the DOT to provide information on what best management practices will be employed and who oversees adherence to those standards, including who tests water quality during construction and how often.

Thank you for considering NRWA's requests.

Sincerely,

Louise Washer
President, Norwalk River Watershed Association