

December 6, 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 includes an assessment of the cumulative effects, including increases in stormwater runoff, of the multiple CTDOT projects planned for the Norwalk River Watershed. This EA/EIE should offer a more detailed assessment of damage to water quality, wetlands, wildlife, wildlife habitat and aquatic life during construction and from stormwater runoff from the Walk Bridge project and other projects including the the Yankee Doodle bridge project. The EA/EIE should also include more specific information regarding plans for mitigation of impact.

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, 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. Two 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.” It 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 for the last two decades 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 stormwater runoff from this new bridge and the other DOT projects in the watershed will seriously set back our community’s efforts to improve water quality in the Norwalk River.

NRWA requests that a third party EA/EIE consider the cumulative impact this project will have on stormwater runoff in conjunction with other projects underway at the same time. The Yankee Doodle Bridge repair project, the Route 7/Rt. 15 Interchange project and the close to 20 other DOT projects, some of which are large in scale, will impact the Norwalk River Watershed by increasing the amount of runoff originating from impervious surfaces. The combined effect of these projects makes stormwater 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 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. We also request that the DOT add requirements for capturing runoff to its plans for the restoration of the Yankee Doodle Bridge north of Walk Bridge. The repair of the Walk and the Yankee Doodle bridges alone present the CTDOT with a unique opportunity to reduce the amount of contaminated stormwater runoff that enters the Norwalk River, the harbor and the Sound. A concrete commitment to capturing runoff from these two bridges 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 impacts of four years of construction. The new EIE should include consideration of the permanent damage that four years of temporary impact can cause to water quality, wetlands and aquatic life.

We ask the CTDOT 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 will oversee adherence to those standards, including who will test water quality during construction and how often. NRWA asks CTDOT to consult with both Harbor Watch, which currently conducts regular water quality testing in the river, and the Maritime Aquarium 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.

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. 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 the plans for this project are forward-

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

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

Thank you for considering NRWA’s concerns.

Sincerely,

Louise Washer

President, Norwalk River Watershed Association