



PO Box 7114
Wilton, CT 06897
norwalkriver.org

To: Eric McPhee, DPH – Drinking Water Section

Date: September 23, 2022

Re: Public Scoping Meeting, Norwalk First Taxing District - Grupes Dam Rehabilitation

I am submitting these comments on behalf of the Norwalk River Watershed Association (NRWA) which represents over 2000 participants working together to protect water quality and fish and wildlife habitat in six CT towns--Norwalk, Wilton, Ridgefield, Redding, Weston, New Canaan—as well as Lewisboro, NY.

It is the position of the NRWA that an Environmental Impact Evaluation of the Grupes Dam Restoration project is necessary as part of the Department of Public Health scoping under the CT Environmental Policy Act. NRWA urges consideration of the following three points not addressed by DEEP Dam Safety in the permitting process.

1. The project as proposed requires the removal of riparian buffer vegetation and the erection of walls and earthen berms contiguously along 1500 feet of the east side of the reservoir. The effects of the loss of roughly 400 trees and scores of native shrubs were not considered during the Dam Safety permitting process, as was testified to by the First Taxing District attorneys and DEEP staff during adjudication. (See image 1 below)

2. The effects the proposed wall will potentially have on wetlands on the adjacent Land Trust property were also not considered during the permitting process, according to testimony from DEEP. DEEP staff member Danielle Missel testified that only wetlands within the building envelope were considered. The entire building envelope is on the First Taxing District property. (See image 2)

The adjacent land trust wetlands, fed by a 50-acre watershed, flow into the reservoir through two intermittent streams that cross First Taxing District property and will be walled off and diverted from the reservoir in the proposed plans. The effects of this diversion were not considered during permitting, first, because the wetlands were omitted from the permitting drawings of 2017 and then because they were added back in 2020 in a truncated form, without the intermittent streams. To illustrate how the wetlands mapping changed, see images 3-8 below.

There was a site visit in the fall of 2020 during adjudication which was during a drought, and water was not flowing out of the wetlands. When it rained again later, we submitted a video of the wetlands, but it was not allowed in as evidence because it was too late. Watch the video [here](#).

[New Canaan, Norwalk, Redding, Ridgefield, Weston, Wilton, Lewisboro NY](#)

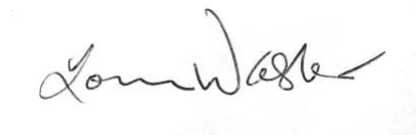
See images 9-10, images of the wetlands after rain showing the areas that were removed from the survey and that are plainly wetlands/streams.

3. It is NRWA's position that there are viable alternatives to this project which would repair the dam to safety and would be less damaging to the wetlands and the riparian buffer along the reservoir and that were not considered during the planning or permitting process. During adjudication, engineer Laura Wildman, then of Princeton Hydro and now at Save the Sound, and wetland scientist, William Kenny, of William Kenny Associates, presented ideas for alternatives, three of which are illustrated in Figures 2,3 and 4 below.

We feel that a complete evaluation of the potential environmental effects of the project as proposed is needed, and that the results then need to be weighed against those of possible alternatives.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Louise Washer", is written over a light gray rectangular background.

Louise Washer, President
Norwalk River Watershed Association

Image 1. The project as proposed requires the removal of riparian buffer vegetation and the erection of walls and berms along 1500 feet of the east side of the reservoir.

The effects of the loss of roughly 400 trees and scores of native shrubs were not considered during the permitting process, as was testified to by the First Taxing District and DEEP.

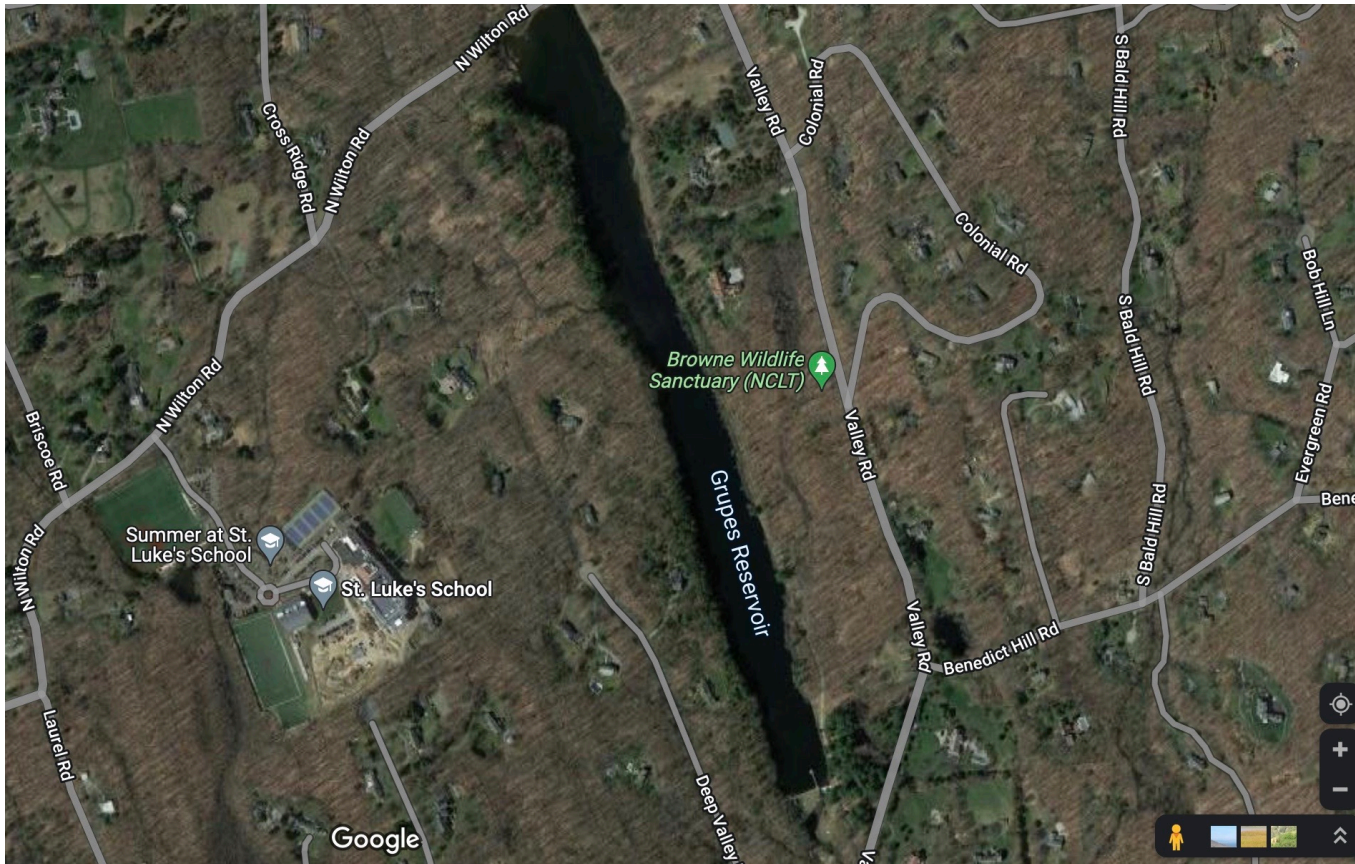


Image 2

Intermittent
streams that
drain
wetlands to
reservoir in
blue circle

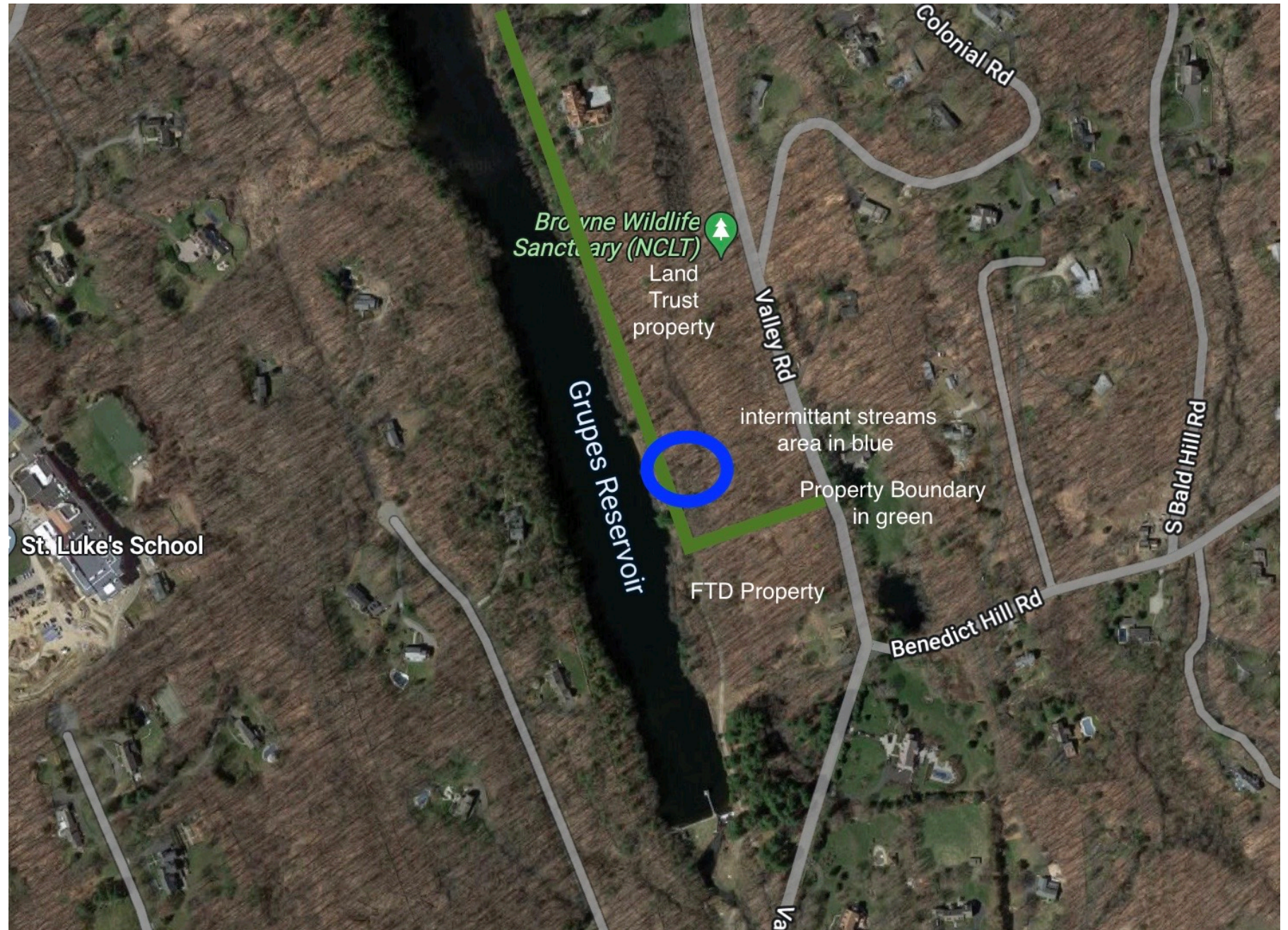


Image 3

Survey Map on File with the Town of New Canaan Shows the Land Trust Wetlands Draining to Grupes Reservoir Through Two Streams

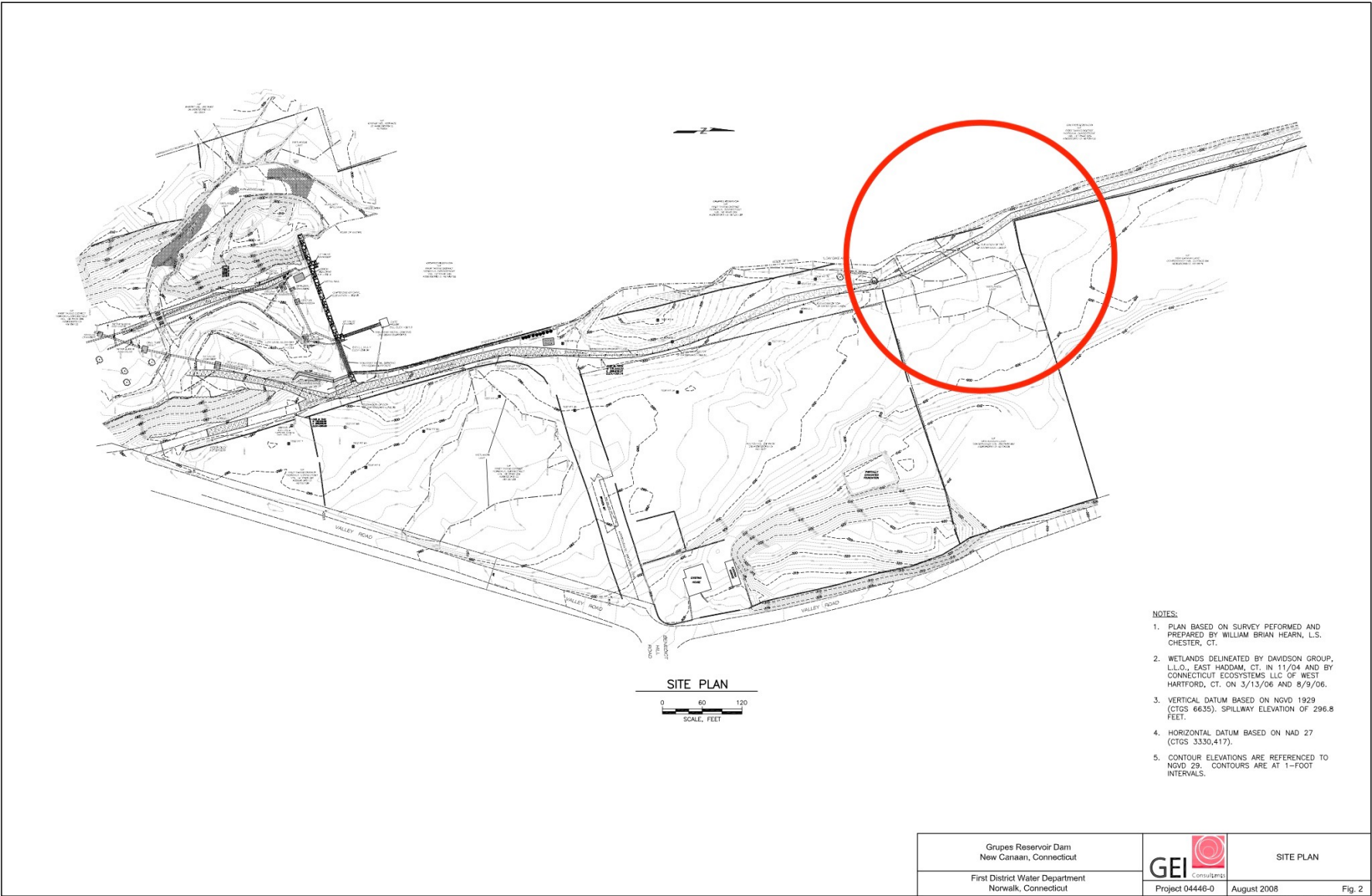
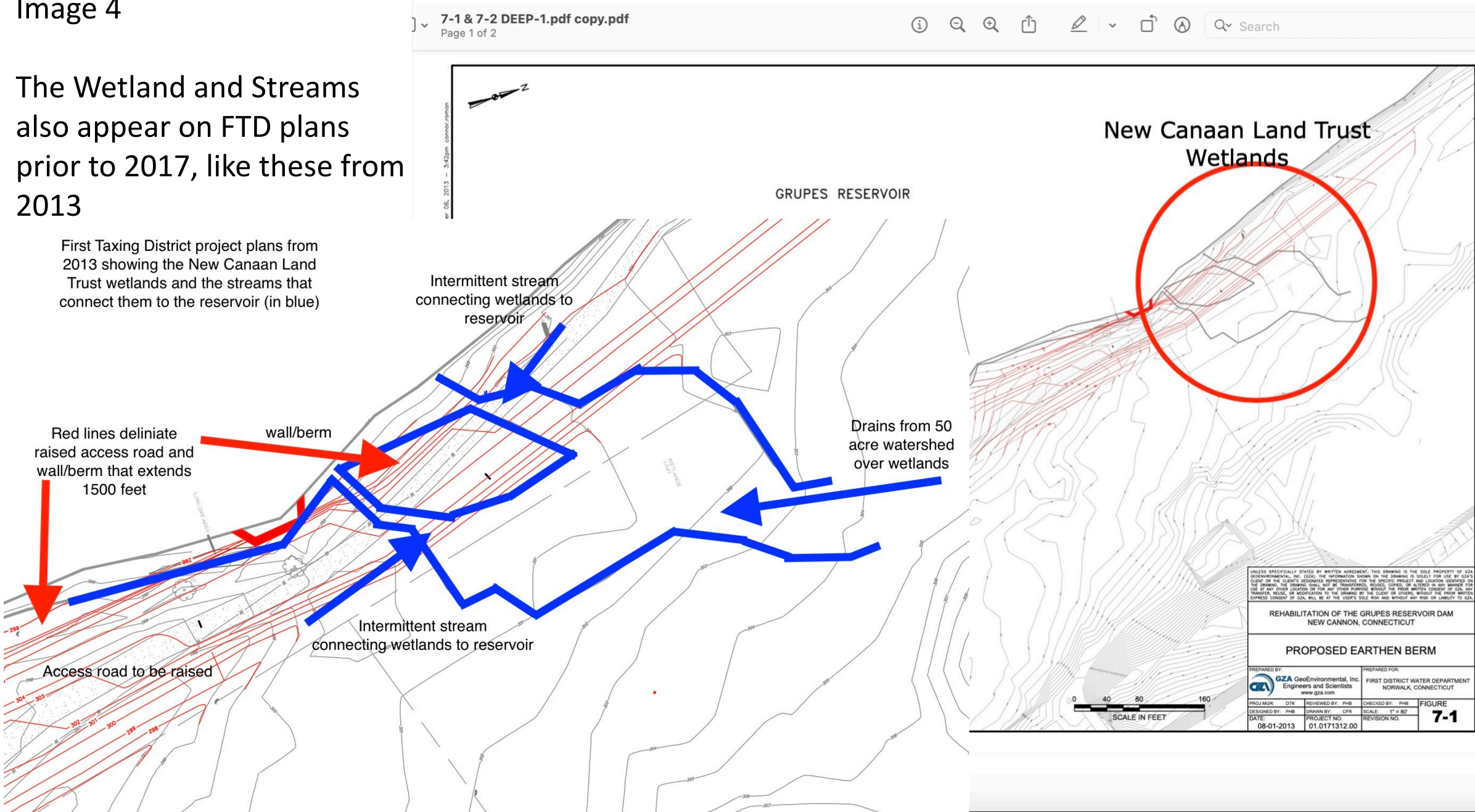


Image 4

The Wetland and Streams also appear on FTD plans prior to 2017, like these from 2013





New Canaan
Land Trust

Topo Map (2' elev. marks) Browne Preserve



0 80 160 320 480 640
Feet



Image 6

Land Trust Wetlands Not Shown on Permitting Plans, 2017, Though Other Wetlands Are Shown

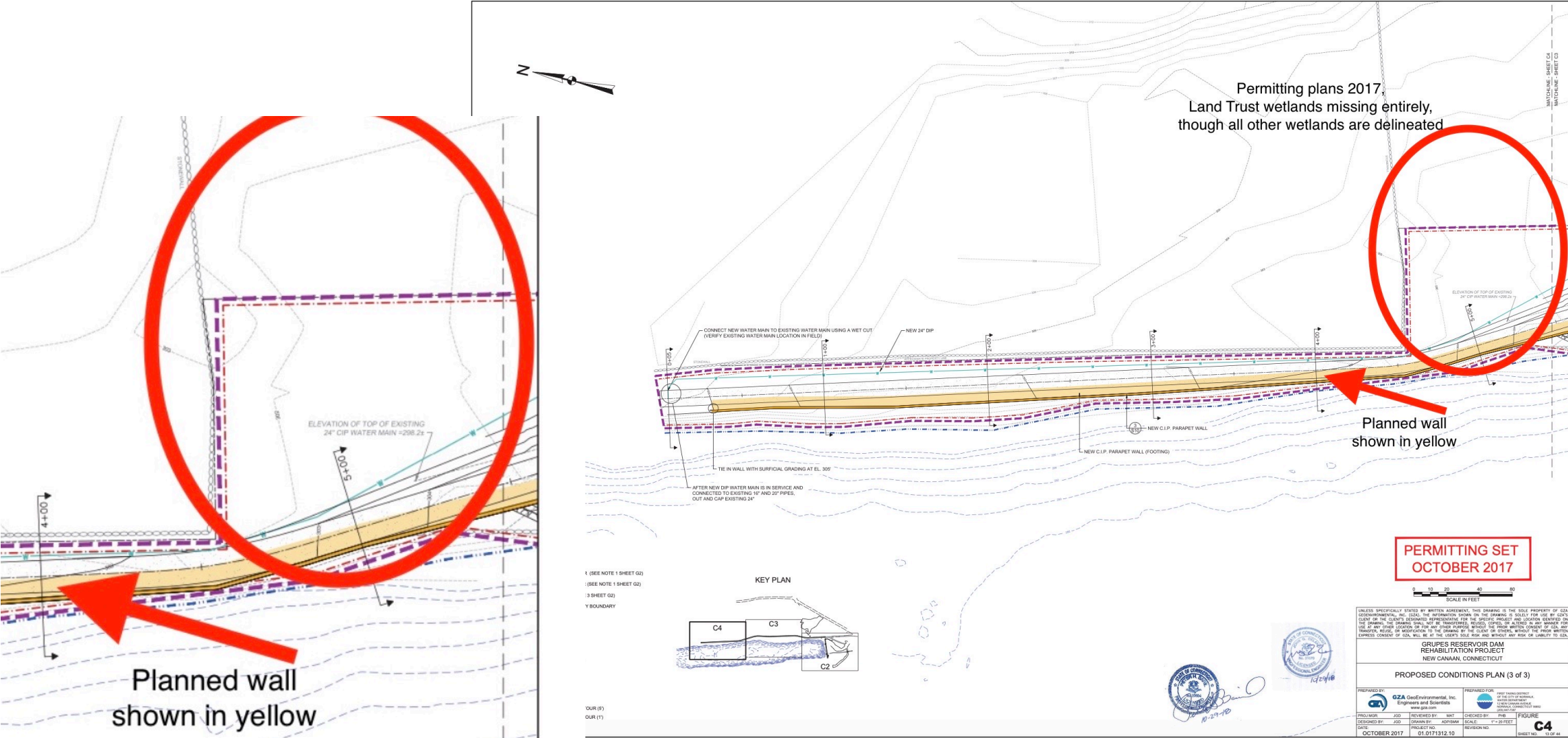


Image 7

Wetlands redrawn by FTD in 2020 during adjudication, omitting streams and showing only part of existing channel

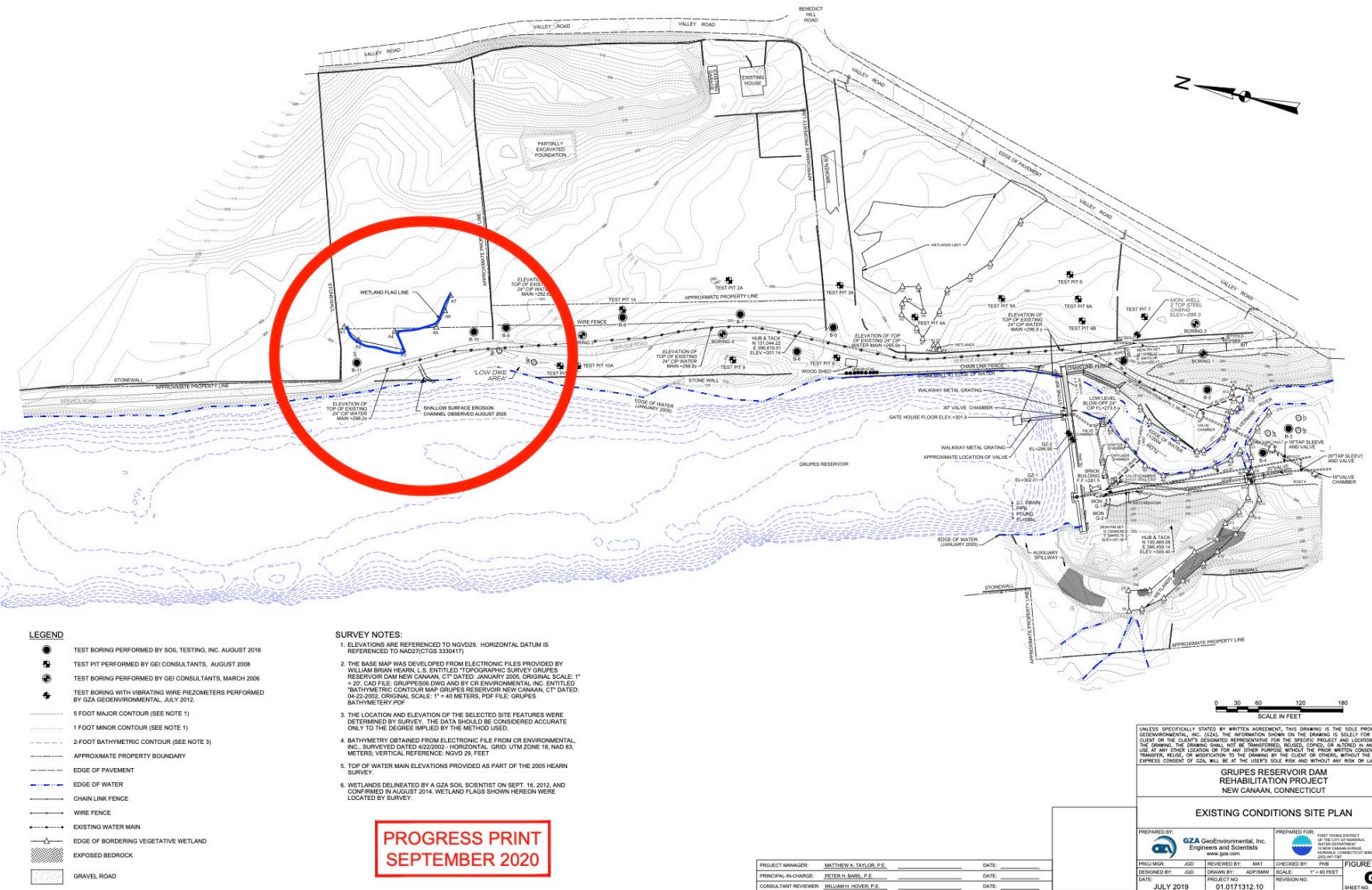


Image 8

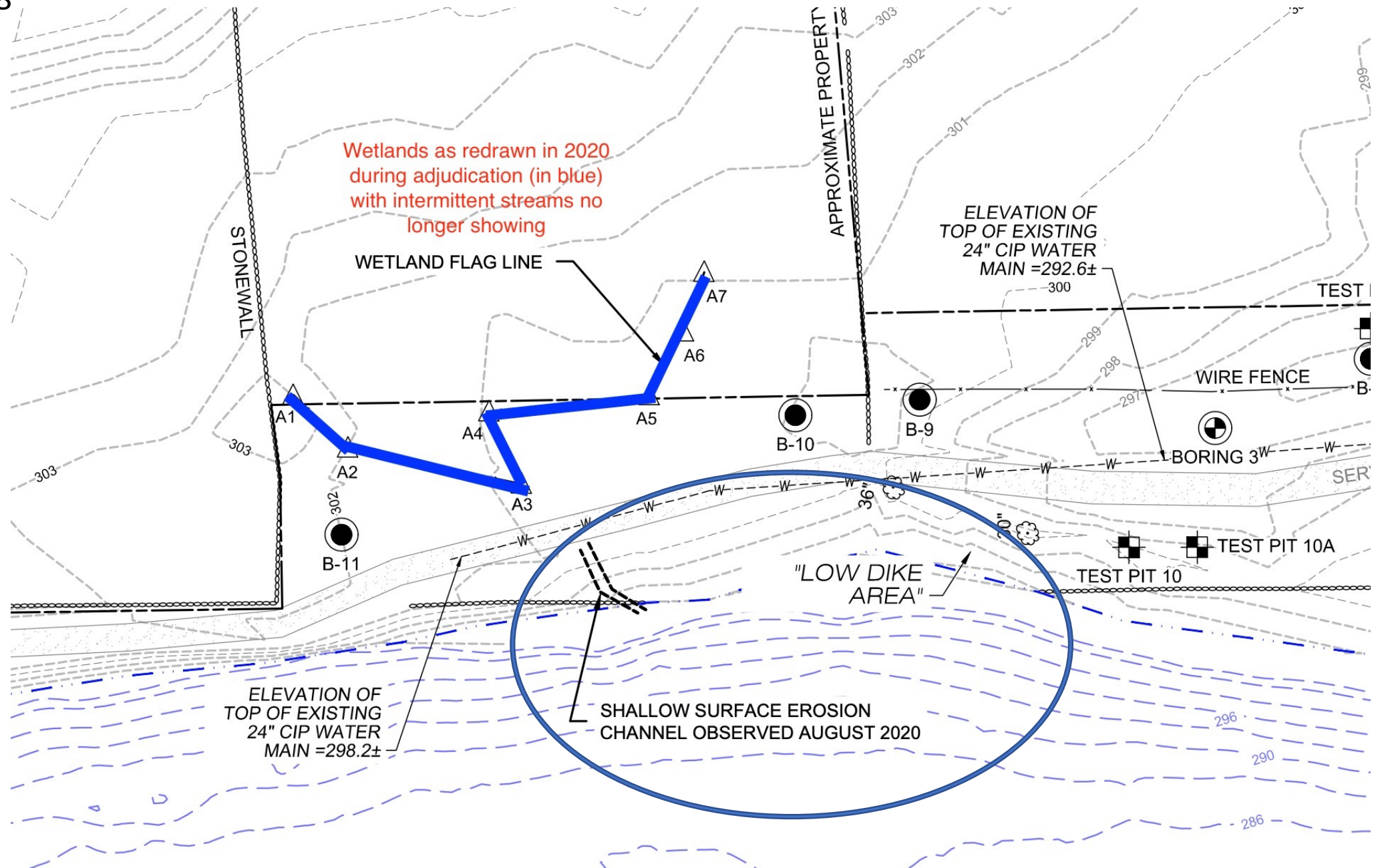


Image 9: Northern-most of the two Intermittent Streams Draining Browne Sanctuary Wetlands to Grupes Reservoir



Image 10: Southern-most of the two Intermittent Streams Draining Browne Sanctuary Wetlands to Grupes Reservoir



FIGURE 2: POTENTIAL ALTERNATIVE TO RAISE EASTERN BANK/ACCESS ROAD TO EL. 302, WITHOUT IMPACTING WETLAND
COULD BE TEAMED WITH ALTERNATIVES THAT DO NOT REQUIRE DAM RAISING

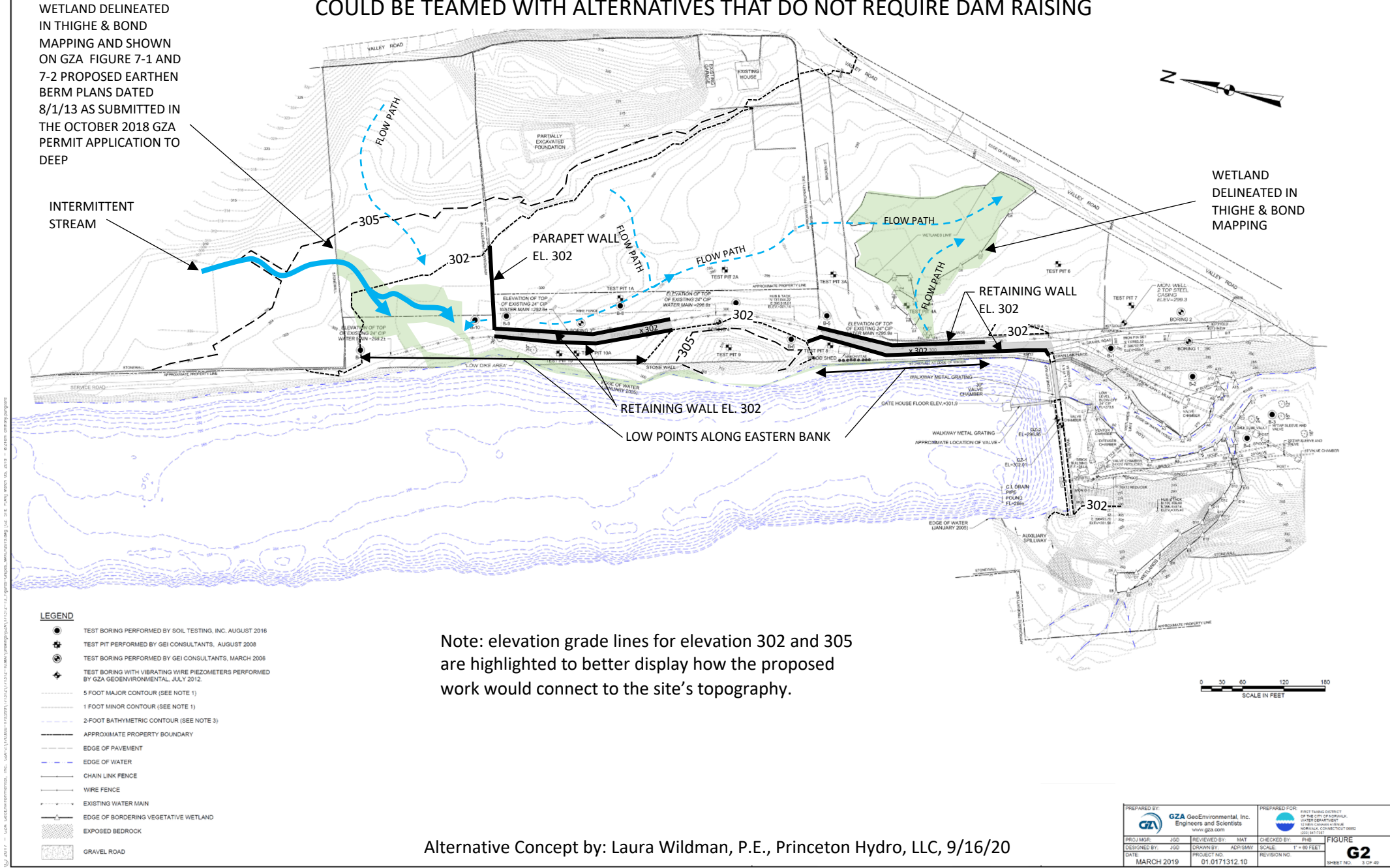


FIGURE 3: POTENTIAL ALTERNATIVE TO MODIFY THE PRINCIPAL AND/OR AUXILIARY SPILLWAY WIDTHS

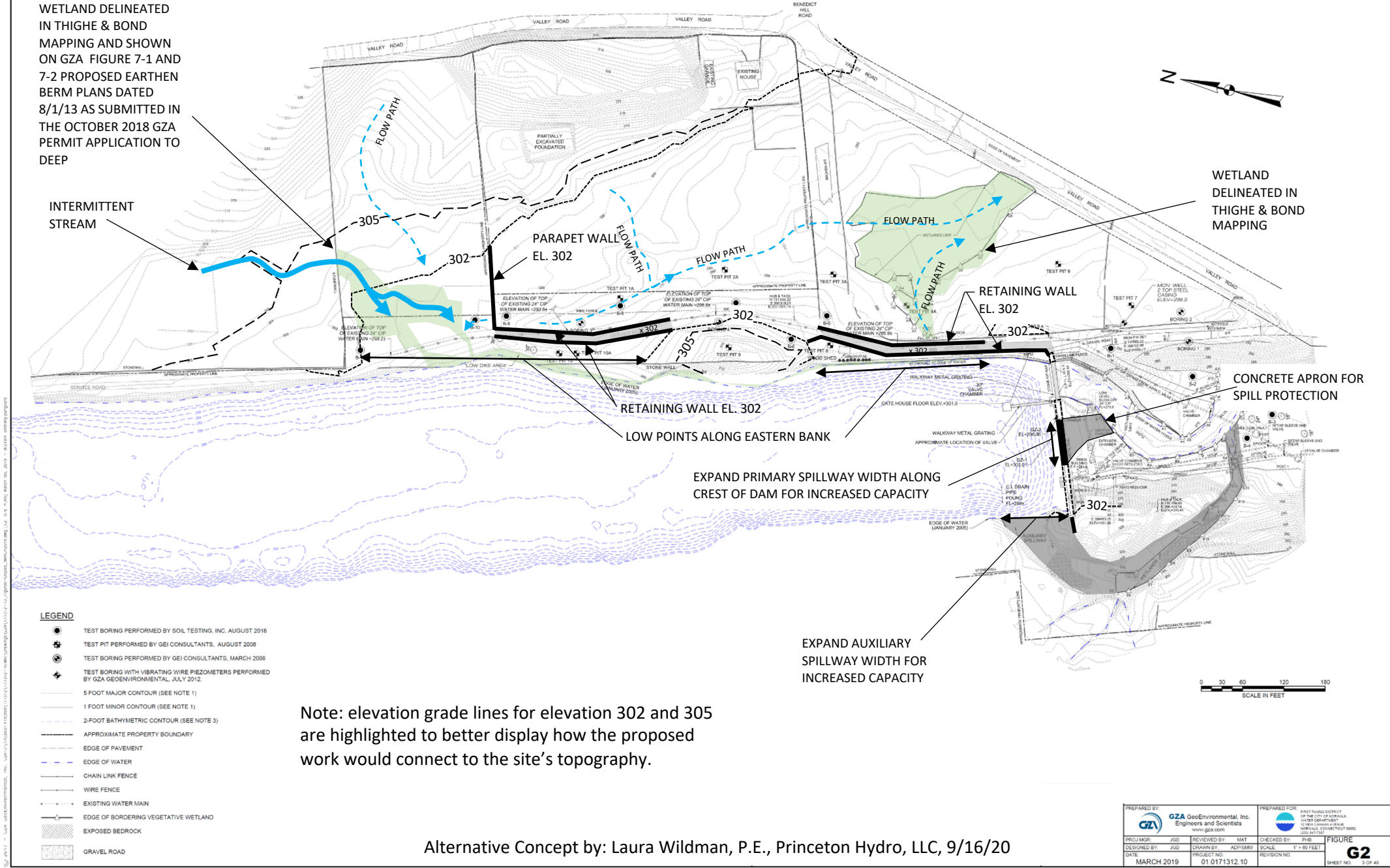


FIGURE 4: POTENTIAL ALTERNATIVE TO RAISE DAM TO EL. 305 COULD BE MODIFIED TO MINIMIZE IMPACTS TO WETLAND AND THE IMPOUNDMENT VEGETATIVE BUFFER

