

To: Matthew Pafford, OPM
450 Capitol Avenue, Hartford CT 06106

From: Linda Brunza- Environmental Analyst

Telephone: 860-424-3739

Date: 2/16/2018

Email: Linda.Brunza@ct.gov

Subject: Scoping Notice for Whiting Street Improvement Project, Winchester

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the technical design and construction of improvements to Whiting Street between Main Street and Holabird Avenue in the Town of Winchester.

The following comments are submitted for your consideration.

Flood Management

The proposed project appears to be within the 100-year flood zone on the community's Flood Insurance Rate Map. Because this is a state action, the project must be certified by the sponsoring agency as being in compliance with the flood and stormwater management standards specified in section 25-68d of the Connecticut General Statutes (CGS) and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA) and receive approval from DEEP. For further information, contact the Land and Water Resources Division at 860-424-3706. A fact sheet regarding floodplain management and the certification form can be downloaded at: [Flood Management](#).

Erosion and Sedimentation Control

In order to protect wetlands and watercourses on and adjacent to the site, strict erosion and sediment controls should be employed during construction. The *Connecticut Guidelines for Soil Erosion and Sediment Control* prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines is available online at: [Erosion Control Guidelines](#). A *Low Impact Development Appendix* to the Guidelines has been prepared to provide specific guidance on low impact development techniques. It is also available on-line at: [LID Appendix](#).

Riparian Corridors

Riparian vegetation performs a variety of functions essential to a healthy instream aquatic environment. It naturally filters sediments, nutrients and other nonpoint source pollutants from overland runoff. Vegetation maintains water temperature and stabilizes stream banks, reducing erosion and aquatic habitat degradation. The project plans should preserve existing streambank

vegetation and, where feasible, enhance it with additional plantings. Inland Fisheries Division Riparian Corridor policy recommends that every effort be made to maintain a 100-foot wide natural undisturbed riparian buffer adjacent to waterbodies. See link for a copy of the policy: [Riparian Corridor Policy](#).

Water Quality

DEEP recommends incorporating Low Impact Development (LID) techniques into the proposed Whiting Street improvement project. This could assist in addressing long-standing issues with the quality of water draining into the Still River. According to the [2016 Connecticut Integrated Water Quality Report to Congress](#), water quality in the stretch of Still River closest to the project site is “not supporting” for aquatic life and “not supporting” for recreation. For aquatic life, it is suspected that stormwater, industrial discharges, illicit discharges, landfills and groundwater all impact water quality. Impairments for recreational use are due to high bacteria counts as noted in the [Connecticut Statewide Bacteria Total Maximum Daily Load Analysis](#) (see [Appendix A, No. 29 for Still River bacteria impairments](#)). According to this evaluation, potential sources of bacteria in this segment of the Still River include: permit sources, illicit discharges, failing septic systems, stormwater runoff, wildlife, pets, and other sources. For additional information, please see the attached February 13, 2018 Memo from Susan Peterson in the Water Planning and Management Division.

Inland Wetlands and Watercourses

It is unknown whether construction will be contained along the road with no direct wetland or watercourse impacts. DEEP recommends that a certified soil scientist perform a reconnaissance of the site in order to determine whether there are any areas which would be regulated as wetlands or watercourses as defined by section 22a-38 (15) and (16) of the Connecticut General Statutes (CGS), respectively. If the reconnaissance identifies regulated areas, they should be clearly delineated. Any activity within federal regulated wetland areas or watercourses at the site may require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Further information is available on-line at [Army Corps of Engineers, New England District](#) or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. If a permit is required from the U.S. Army Corps of Engineers, a Water Quality Certificate will also be required from DEEP pursuant to section 401 of the Clean Water Act. For further information, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available on-line at [401 Certification](#).

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ Office of Planning and Program Development
Susan Peterson, DEEP/ Water Planning & Management Division
Jeff Caiola, DEEP/ Land & Water Resources Division
Bob Gilmore, DEEP/ Land & Water Resources Division



Memo

To: Linda Brunza, Environmental Review
From: Susan Peterson, BWPLR WP&M Watersheds Program
CC: Bob Hannon; Chuck Lee
Date: February 13, 2018
Re: Scoping Comments for: Winchester – Whiting Street Improvement Project (revised version)

My comments on the above referenced project are as follows:

The incorporation of Low Impact Development (LID) elements such as the proposed installation of a bio-swale into the design and construction of this anticipated Responsible Growth and Transit-Oriented Development Grant project to address existing flooding and drainage issues along Whiting Street in a manner that also improves the quality of the surface and ground waters draining to the nearby Still River are important and highly desirable considerations. Such efforts would also build on projects previously supported and/or implemented by the federal government, State, the Town of Winchester, and conservation organizations (described in more detail below) to improve and protect the stretch of the Still River which flows through this community and is an important natural resource asset.

More specifically, the following matters should be taken into account with regard to why LID features should be considered and included to the extent feasible in the design and construction of this proposed project:

- According to the 2016 *Connecticut Integrated Water Quality Report to Congress (IWQR)*, water quality in the stretch of Still River (Still River (Winsted)-03 or CT4303-00_03) closest to the project site is “not supporting” for aquatic life (due to unknown causes) and also “not supporting” for recreation (due to high bacteria levels). The 2016 IWQR can be viewed on the CT DEEP website at:
http://www.ct.gov/deep/cwp/view.asp?a=2719&q=325610&deepNav_GID=1654 .)

- Aquatic Life – Suspected sources impacting aquatic life include: stormwater, industrial discharges, illicit discharges, landfills and groundwater impacts.
- Recreation – A *Connecticut Statewide Bacteria Total Maximum Daily Load Analysis* (TMDL) with a watershed specific appendix for the Still River was developed in 2010, in response to this water quality impairment. According to this evaluation, potential sources of bacteria in this segment of the Still River include: permit sources, illicit discharges, failing septic systems, stormwater runoff, nuisance wildlife/pets and other sources.

The CT Statewide Bacteria TMDL *Core Document* and can be viewed on the CT DEEP website at:

http://www.ct.gov/deep/cwp/view.asp?a=2719&q=505808&deepNav_GID=1654 and appendix relating specifically to *Still River CT4303* bacteria impairments can be found in Appendix A, #29 at: <http://www.ct.gov/deep/lib/deep/water/tmdl/statewidebacteria/stillriver4303.pdf> .

As it plans for redevelopment of the project area, it is important that the Town of Winchester take into account these existing Still River water quality impairments and include measures that will improve surface and ground waters leaving the project site to help reduce the sources currently contributing to these recreation and aquatic life issues.

- The Still River is an important tributary to (the last 1.35 miles of) of Sandy Brook which flows into the West Branch of the Farmington River. The Connecticut portion of the West Branch comprises most of the Upper Farmington Wild & Scenic River area which was designated by Congress in 1994 for “outstandingly remarkable values” (ORVs) related to: recreation, fish and wildlife, scenery and historic resources. This federal Wild & Scenic river area is overseen by the Farmington River Coordinating Committee (FRCC). For more information, see the FRCC website at: <http://www.farmingtonriver.org/index.php> .

The Upper Farmington Wild & Scenic River area is an important regional resource to surrounding communities, including Winchester. Improving the water quality of the Still River has important, long-term consequences to the health of this Wild & Scenic River area. Recognizing this, FRCC has invested a portion of the funds it receives through the National Park Service to support water quality improvement projects in Winchester (described further below) to improve water quality in the Still River.

- Many different entities have already invested in LID projects in Winsted to help improve the water quality of the Still River. For example, CT DEEP recently provided federal Clean Water Act Section 319 Nonpoint Source Program Grant (Sec. 319 NPS grant) funds (received from U.S. EPA) to the Farmington River Watershed Association (FRWA) to work with the Northwest Conservation District (NWCD) and Northwestern Connecticut Community College (NCCC) to install an engineered bioswale adjacent to a NCCC campus parking lot to capture, cleanse and slowly release stormwater that would otherwise drain - untreated - directly to the Still River. (The Northwestern Connecticut Community Foundation and Alcoa also provided funding for this project.)

Prior to the above referenced project, the Watershed Assistance Small Grants Program (WASGP funded through Sec. 319 NPS grant), administered through Rivers Alliance of Connecticut, provided funding directly to NCCC to install two rain gardens, planted with native species, to reduce stormwater runoff and mitigate erosion to the Still River at both the north and south ends of the campus.

In addition, Rivers Alliance of Connecticut (with WASGP funding) and the FRCC (with National Park Service funding) have provided funds to FRWA to work with NWCD and the Town of Winchester to install two LID best management practices – including one on the grounds of the municipal wastewater treatment plant – to prevent bacteria and nutrients from entering the Still River. As part of this project, FRWA also hosted two stormwater education workshops, one for municipal officials and one for private landowners.

In other words, including LID practices (such as the proposed bioswale) in the design and construction of the proposed Whiting Street Improvement Project will build on previous efforts and investments at federal, state and local levels to improve and protect Still River water quality.

- In addition to the proposed bioswale, consideration and incorporation of other LID measures into the design and construction of this project is also encouraged. Other potential LID options might include creation of a riparian buffer along the river (building on the idea already presented in the general project description of removing invasive species from the project site and replacing them with native species), use of pervious pavement for sidewalk areas, etc.

Thank you for the opportunity to provide comments on this proposed Responsible Growth and Transit-Oriented Development Grant project in Winchester.