



Comments regarding the proposed Whiting Street Improvement Project

The Still River is listed on the CT 303(d) Impaired Waters List, and the section in Winsted is among the most urban areas of the watershed. Interception of polluted runoff in this area is of critical concern for the Whiting Street Improvement Project. The river in this area is flashy; the flow rises rapidly to rainfall due to stream channel geomorphology and considerable upstream impervious development resulting in chronic flooding and stormwater issues.

The proposed increase of paved surfaces with the road improvements, parking areas, and sidewalks comes at increased risk to the ecosystem and the effects of stormwater runoff in the Whiting Street Project are magnified as proposed paving and new parking area are located very close to the steep banks of the Still River. The limited amount of green space between the pavement and the river means stormwater runoff has little chance to soak into natural areas and is more likely to flow directly into the river, carrying with it toxic pollutants from the roadway and parking area such as oil, antifreeze, and bacteria. The project should implement quality best management practices (BMP's) such as bioswales, permeable pavement, and maintenance of an adequate riparian buffer. The wording in the Notice of Scooping that states: "and if feasible, installation of a bio swale" is troublesome. "If feasible" is not assurance that environmental water quality concerns will be properly addressed. Stormwater management BMP's such as permeable pavement for the roadway, the installation of bioswales, and proper erosion control and river bank management can work in concert to slow the rate of polluted stormwater to the river. This will allow for particle sedimentation and biological filtration, while protecting the roadway and downstream communities from flooding. Such implementations are critical for the health of the Still River and ultimately for the federally designated *Wild and Scenic* Farmington River downstream.

There is significant potential for erosion, especially if trees are cut along the riverbank, as existing root structures provide essential bank stabilization. Dense infestations of highly invasive Japanese knotweed along the banks of the Still River in the Whiting Street corridor have choked out native herbaceous vegetation, consequently impacting native wildlife and altering natural hydrological processes. We support the project's goal "to remove invasive plants on the river side of the road and replace with native plants", however it is imperative that existing trees remain and that new native bushes, herbaceous plants, and especially trees be planted immediately after disturbance of the soil to thwart invasive re-colonization and to limit erosion. Native New England riparian trees create strong networks of intertwining tree roots that bolster streambanks against collapse, thus limiting erosion and subsequent in-stream sedimentation and habitat degradation and impairment. Unfortunately, the shallow root system of the invasive Japanese knotweed renders streambanks more vulnerable to erosion. Additionally, large trees provide the shade that maintains cool stream temperatures essential to the native fish and





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macroinvertebrate populations of the Still River, and falling leaves are a valuable food source for many stream organisms. We cannot emphasize enough the importance of retaining and replanting large, New England native trees here, which is increasingly imperative as our regional climate becomes more volatile. There should also be a plan to keep the insidious invasive plants, like Japanese knotweed, at bay, as they will readily re-colonize via extensive upstream communities.

We recognize the need for students to have a safe walkway but do not want to see a paved path installed so close to the river. Deicing salts are becoming a huge issue in our waterways, threatening all life within. A permeable pathway that incorporates good in-ground drainage would inherently be less slippery, require minimal deicing, and would be far safer for students and the river ecosystem alike. The pathway should be located as far back from the riverbank as feasible, with plenty of vegetation between the path and the water. The installation of new lighting along the length of Whiting Street can help keep pedestrians and motorists safer but planners should also consider the major environmental effect nocturnal outdoor lighting has upon the natural world. The project should follow the recommendations of the International Dark Sky Association to use light only when and where needed, be no brighter than necessary, minimize blue light emissions, and be fully shielded (pointing downward).

A forward thinking, well planned, environmentally regenerative project can benefit the ecosystem, and help educate NCCC students and residents in the local community as well. The Farmington River Watershed Association has collaborated with the Northwestern Connecticut Community College Environmental Science program on multiple occasions over the last decade to give many students hands-on, real-life skills in sustainability. We've engaged NCCC environmental science, botany and biology classes to plan, design and implement rain gardens and riparian buffers at two on-campus locations and constructed a bioswale behind the Arts and Sciences building slightly downstream from this project site. We've worked with the students to foster their learning firsthand about watershed management, water quality, biodiversity and the importance of healthy, native ecosystems. Signage for the existing rain gardens on NCCC property will be installed and visible to students and the public this spring. The Whiting Street Improvement Project could be designed to create more publicly accessible green space. Done well, this could be a lovely spot for students and local residents to walk peacefully, rest, have lunch and view nature, native plants and the beautiful Still River.

A handwritten signature in blue ink that reads "Alisa Phillips-Griggs".

Alisa Phillips-Griggs
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