



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

To: Meg Riding - Executive Secretary
Office of Policy & Management, 450 Capitol Avenue, MS#55SEC, Hartford

From: David J. Fox - Senior Environmental Analyst **Telephone:** 860-424-4111

Date: July 19, 2012 **E-Mail:** david.fox@ct.gov

Subject: Pucker Street Bridge, Coventry & Columbia

The Department of Environmental Protection has received the Notice of Scoping for the proposed project to substantially rehabilitate the Pucker Street bridge over the Hop River between Coventry and Columbia. The following comments are submitted for your consideration.

The proposed project area is within the 100-year flood zone on the community's Flood Insurance Rate Map. Because it involves State funding, the project must be certified by the sponsoring agency as being in compliance with 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). Pursuant to a 2009 Memorandum of Understanding (MOU) between our Department and the Department of Transportation, various municipal projects, including those funded under the Local Bridge Program, are deemed to be approved under the Flood Management Act provided that the project complies with the requirements of the MOU. The procedure established by the MOU includes certification by the chief elected official of the municipality, review by the Environmental Planning Office and Drainage & Hydraulics Section of DOT and certification by DOT's Transportation Engineering Administrator.

The inland wetlands and watercourse at the site are regulated by the Coventry Inland Wetlands Agency and the Columbia Inland Wetlands & Watercourses Commission, pursuant to section 22a-42 of the CGS. The local agencies should be contacted regarding permit requirements.

In order to protect any wetlands and watercourses adjacent to the site, strict erosion and sediment controls should be employed during construction. Additionally, all silt fencing should be removed after soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted. The *Connecticut Guidelines for Soil Erosion and Sediment Control* prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines, published as DEP Bulletin 34 may be obtained at the DEP bookstore, either by telephone 860-424-3555 or online at: [DEP Bookstore](#).

Stormwater discharges from construction sites where one or more acres are to be disturbed require a permit pursuant to 40 CFR 122.26. The Permitting & Enforcement Division has issued a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEP-PERD-GP-015) that will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. For sites where more than 10 acres will be disturbed, the plan must be submitted to the Department. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing stormwater management measures. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and it adheres to the *Connecticut Guidelines for Soil Erosion and Sediment Control*. If no review is conducted by the town or written approval is not provided, the permittee must register with the Department. For further information, contact the division at 860-424-3018. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

The Natural Diversity Data Base (NDDB) has records of extant populations of two species listed by the State as species of special concern, pursuant to section 26-306 of the CGS, within the project area. These are the wood turtle (*Glyptemys insculpta*) and the Eastern hognose snake (*Heterodon platirhinos*).

Wood turtles require riparian habitats bordered by floodplain, woodland or meadows. They hibernate in the banks of the river in submerged tree roots. Their summer habitat includes pastures, old fields, woodlands, powerline cuts and railroad beds bordering or adjacent to streams and rivers. This species has been negatively impacted by the loss of suitable habitat. In an effort to protect wood turtles, the following guidelines shall be followed for the entire duration of the project:

- Silt fencing shall be installed around the work area prior to construction;
- After silt fencing is installed and prior to construction, a sweep of the work area shall be conducted to look for turtles;
- Workers shall be apprised of the possible presence of turtles and provided a description of the species (See fact sheet at: [Wood Turtle](#))
- Any turtles that are discovered shall be moved, unharmed, to an area immediately outside of the fenced area and positioned in the same direction that it was walking;
- No vehicles or heavy machinery shall be parked in any turtle habitat;
- Work conducted during early morning and evening hours shall occur with special care not to harm basking or foraging individuals; and
- All silt fencing shall be removed after work is completed and soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted.

Eastern hognose snakes are a species that has been declining due to loss of suitable habitat. They favor sandy areas with well-drained gravelly soils. The active period for these snakes is

April through November. Therefore, they will be more visible at this time and, in most cases, move out of harm's way.

The NDDB includes all information regarding critical biologic resources available at the time of the request. This information is a compilation of data collected over the years by the Department's Bureau of Natural Resources and cooperating units, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site specific field investigations. Consultations with the NDDB should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern as well as enhance existing data. Such new information is incorporated into the NDDB as it becomes available. If the project is not implemented within 12 months, then another NDDB review should be requested for up-to-date information. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Thank you for the opportunity to review this project. If there are any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD
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