



STATE OF CONNECTICUT

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August 25, 2023

Kevin F. Carifa, Transportation Planning Director
Connecticut Department of Transportation
Bureau of Policy and Planning
2800 Berlin Turnpike
Newington, CT, 06131
comments@7-15norwalk.com

Re: State Project No. 102-358, Route 7 / Route 15 Interchange

Dear Mr. Carifa,

The Council on Environmental Quality (Council) offers the following comments regarding the Environmental Impact Evaluation (EIE) for the Route 7 / Route 15 Interchange project in Norwalk.

Wetlands

The Department of Transportation's (DOT) EIE notes that alternative 21D could permanently impact approximately 3 acres of wetlands, approximately 120 linear feet (LF) of intermittent streams, and approximately 650 LF of perennial streams, while the preferred alternative 26 could permanently impact approximately 1.4 acres of wetlands, approximately 40 LF of intermittent streams, and approximately 410 LF of perennial streams. As noted in the Council's annual report, [Environmental Quality in Connecticut](#),¹ "wetlands serve many functions, one of them being their unique ability to store and sequester carbon", and wetlands "should be recognized as important to greenhouse gas (GHG) mitigation strategies and incorporated into inland wetland protection efforts in Connecticut." The Council notes that the potential permanent impacts to wetlands in the proposed project area could impact the values and functions of wetlands identified within the proposed project area. The Council questions whether the EIE should also include a review and analysis of the potential impacts to 1) carbon sequestration and storage for the potential permanent impacts to wetlands, and 2) values and functions for the remaining nearby wetlands resulting from the potential permanent impacts to wetlands within the proposed project area.

The EIE notes that "impacts to wetlands would be mitigated per state and federal requirements" and that "any mitigation needs following those avoidance measures would be identified and agreed upon in conjunction with the appropriate regulatory agencies". The Regulations of Connecticut State Agencies, Section 22a-1a-8 (f)(6)(E) states that a discussion of the potential environmental impact of the action should include "*mitigation measures to the action including: limiting the degree or magnitude of the action; rectifying the effects of such action by repairing, rehabilitating or restoring the impacted environment; reducing or eliminating the impact over time by preservation and maintenance operations; and compensating for the impact by replacing or providing substitute resources or environments.*" Consequently, the Council recommends that the DOT prioritize avoidance during the project design for reducing potential permanent impacts to wetlands. If permanent impacts to wetlands are unavoidable, the Council recommends that the DOT explore restoration and enhancement of impaired wetlands within the proposed project area or along the Route 7 and Route 15 corridor as mitigation before exploring compensatory creation

of wetlands. In all circumstances, the Council recommends that the permanent loss of wetlands be addressed by restorative or compensatory measures at a ratio greater than 1:1 for the proposed mitigation to have a net benefit to the wetland system. Additionally, the Council questions if the potential permanent impacts to wetlands within the project area should be included in the review and analysis of “Irreversible and Irrecoverable Commitments of Resources”.

Noise

The Council received a complaint from a resident of Westport in May 2022 regarding noise generated by traffic travelling along Route 15 over bridge expansion joints in the Westport area. The EIE notes that because the noise level would exceed the noise abatement criteria (NAC) within the project area, evaluation of abatement strategies is required. In sections 3.4.3 and 7 it states that “CTDOT’s final recommendation regarding noise abatement would be made during the project’s final design and public involvement process”. However, in Tables 2.4.2 and E1.1.1, for both alternative 21D and the preferred alternative 26, the EIE states that “although the NAC is approached/exceeded in 1 location, initial analysis shows noise abatement is not considered reasonable.” Consequently, the Council questions how noise generated by traffic within the project area, including noise potentially generated by vehicles travelling over the expansion joints for the four new bridges and two existing historic bridges for the preferred alternative 26², would be mitigated in the final design for nearby receptors.

Stormwater

The EIE states in sections 3.8.3 and 7 that “the Project design would be in accordance with the General Permit for the Discharge of Stormwater from CTDOT Separate Stormwater Discharge Systems (TS4) to the maximum extent practicable to mitigate any potential increases to current impairments (sedimentation/siltation) identified on the 303(d) list for the segment of the Norwalk River that traverses the Project area (ID CT7300-00_01)”. The EIE also states that the DOT will “identify specific stormwater management and monitoring practices during Project design, including practices to mitigate sedimentation or siltation to the Norwalk River”. The Council questions under what circumstances the DOT would not be able to meet the requirements of the General Permit for the Discharge of Stormwater, what potential impacts could result from failing to meet the General Permit requirements, and how could the project design eliminate and not just mitigate sedimentation or siltation of the Norwalk River, potentially resulting from the proposed project.

Thank you for your consideration of the Council’s comments.

Sincerely,



Paul Aresta
Executive Director

¹ Connecticut Council on Environmental Quality, Environmental Quality in Connecticut, May 4, 2023; <https://portal.ct.gov/CEQ/AR-22-Gold/2022-CEQ-Annual-Report-eBook/Land---Preserved-Land/Wetlands>

² The same question would apply for alternative 21D that would require the construction of eleven new bridges and the reconstruction of three existing bridges.