

**To:** Kevin Fleming, Department of Transportation  
2800 Berlin Turnpike, Newington CT

**From:** Linda Brunza- Environmental Analyst

**Telephone:** 860-424-3739

**Date:** 7/26/2021

**Email:** [Linda.Brunza@ct.gov](mailto:Linda.Brunza@ct.gov)

**Subject:** Hop River State Park Trail and new bridge over Hop River replacing former railroad bridge No. 2.53.

The proposed project reconstructs a multi-use trail with stone dust surface and the construction of a new pedestrian bridge over Hop River to replace a former railroad bridge that has failed. This will include signage, fencing, and landscaping and a possible parking lot. The following comments are submitted for your consideration.

#### **DEEP State Parks and Trails/ Hop River Trail**

Hop River State Park Trail is a popular hiking area. Please continue to work with DEEP staff from State Parks. To coordinate signage and post notices on DEEP's website, please contact Laurie Giannotti at [Laurie.Gianotti@ct.gov](mailto:Laurie.Gianotti@ct.gov).

#### **Watershed/ Water Quality**

Please review the attached comments from DEEP's Water Planning and Management Division. Of note is the mention of an undermanaged stormwater outfall discharge from Route 66 (Columbia) where stormwater runoff eroded the slope and discharges across the existing trail east from the Flanders Road crossing. Please note to continue to work with DEEP Fisheries, as there was a habitat enhancement program close to the Flanders Road tunnel. An access gate could be considered to reduce vehicle traffic that historically uses this segment of the trail. Please contact Eric Thomas at 860-424-3548 or via email at [Eric.Thomas@ct.gov](mailto:Eric.Thomas@ct.gov) with any questions.

#### **Inland Wetlands and Watercourses**

A map of this area shows that different project components could impact Hop River. Mitigation may be required for any impacts that cannot be avoided. If the reconnaissance of the site by a certified soil scientist identifies regulated areas, they should be clearly delineated. Any activity within federally 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](http://www.army.mil/newengland) 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 online at [401 Certification](http://www.deep.state.ct.us/401).

## **Inland Fisheries**

DEEP Fisheries will work with the DOT during the permit review process to ensure fisheries resources and habitats are protected. Time of year restrictions will be considered if there is direct in-stream work. Please note there were various project meetings over the years and Fisheries provided comments in 2017 regarding this project stating that any in-river pier infrastructure should be removed, and to regrade a sediment bar upstream. DEEP Inland Fisheries can be contacted at 860-295-9523.

## **Threatened and Endangered Species**

DEEP Wildlife Division maintains the Natural Diversity Database (NDDB) maps. DEEP Wildlife Division confirmed that no application was submitted by DOT at this time for this project. The following general comments are offered based on the review from the Hop River bridge replacement project:

Turtles:

- There are records of turtles just upstream from the bridge, DEEP recommends fencing in the construction area to keep turtles out.
- In-stream ground disturbance work should be done during the turtle active season, which will be discussed in more detail in the determination letter.
- Maintaining in-stream overwintering areas, such as tree roots, fallen trees, logs, crevices, can assist in protecting turtle habitat.

Freshwater mussels

- The Wildlife Division is not aware of any freshwater mussel data in this stream. If dewatering is needed and the streambed is exposed, the Wildlife Division would like the opportunity to check for fresh water mussels and salvage any that could perish. Please contact Laura Saucier ([Laura.Saucier@ct.gov](mailto:Laura.Saucier@ct.gov)) with any advanced notice if this is an option.

## **Air Quality**

DEEP Air Bureau typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications

for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

**PCBs**

When demolition occurs, debris may include materials that contain polychlorinated biphenyls (PCBs). Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to the air during replacement. Please contact Gary Trombly for more information at [Gary.Trombly@ct.gov](mailto:Gary.Trombly@ct.gov) in the Emergency Response and Spill Prevention Unit.

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/ OPPD  
Matt Goclowski  
Eric Thomas  
Laurie Giannotti  
Sharon Gustave



# Memo

To: Linda Brunza, Office of the Commissioner/ Environmental Review  
From: Eric Thomas, BWPLR/ Planning and Management Division  
CC: E. Bedan  
Date: 7/26/2021  
Re: Hop River State Park Trail Bridge Replacement Scoping Comments  
(Columbia/Coventry)

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The Hop River State Park Trail project site is located within two subregional watersheds, with the vast majority within the Hop River subregional (#3108) and the extreme eastern end within the Willimantic River subregional (#3100). The Hop River, mostly parallel to the State Park Trail, flows into the Willimantic River within the protected Hop River and the Willimantic River Water Access areas under State ownership.

Surface water quality classification for the Hop River is “A” and “B” for the Willimantic River. Ground water classification is “GA” throughout the project site. The proposed trail and bridge replacement project final design elements should be consistent with the Connecticut Water Quality Standards and Criteria for these classifications.

There are no current watershed-based plans for the lower Hop River or receiving section of the Willimantic River in the proximity of this bridge replacement and approximately 4,440-foot-long rail trail improvement project.

The Connecticut Stream Flow classification is “1” for the Hop River at the proposed new bridge crossing location, indicating a near “free flow” regime. Hydrologic stressors in the lower Hop River system are primarily from upstream dams and water diversions. There is a slow water impounded section immediately upstream of the current railroad bridge, and a noticeable riverbed gradient drop with a couple of hundred-yard long instream riffle system immediately downstream of the bridge crossing. The Flooding Class for the north (Coventry) side of the bridge site along the Hop River is Frequent, and the Flooding class for the south (Columbia) side of the bridge site along the Hop River is Occasional. Riverbanks on both sides are heavily vegetated downstream of the bridge with established large stabilizing rock placement along the north side of the riverbank that should be left in place. Immediately upstream of the bridge, the north bank is heavily vegetated and

naturally connected to upslope wetland and floodplain area within the Town of Coventry undeveloped 1.3-acre parcel. Across the river on the southern riverbank there is fairly recent property clearing and regrading to at least a few hundred yards above the elevated riverbank. Several mature canopy trees have been left at the top of the riverbank along the river but remaining mid and lower level vegetation is sparse at best. At least one riverbank slope failure is in progress. This area is outside of the DOT project site, but bank stability should be evaluated for potential impact in final design work for the Columbia side of the bridge replacement and rail trail bed.

The Watersheds program is supportive of the clear span bridge conceptual design for this bridge replacement. There have been chronic log and debris jams impinged on most if not all the instream bridge piers in recent decades, creating hazardous conditions for the bridge infrastructure as well as water recreational users in this popular springtime quick water paddling stream.

King Road in Coventry is a paved town road that intersects with the Hop River State Park trail, with an undeveloped former rail bed section leading up to the existing railroad bridge river crossing (DOT bridge No.2.53). There is no roadside curbing to intercept water off the traveling road surface at the proposed trail bed leading to the bridge. Adjacent King Road frontage experiences undesignated vehicle parking to access the improved Hop River State Park trail segment or the informal wooded path access across heavily vegetated Town of Coventry property to the Hop River. Final DOT design should incorporate an appropriate suite of stormwater runoff control and treatment best practices to minimize runoff from entering the Hop River at this new State Park Trail bridge project site. This recommendation supports good health quality of the receiving 11.87-mile-long Hop River segment (CT3108-00\_01a). The 2020 Connecticut statewide Integrated Water Quality Assessment states full supporting conditions for the designated uses of Aquatic Life and for Recreation along this Hop River segment.

I was unable to determine the location of the proposed short bridge (aka cattle crossing) as part of this project. I was unable to walk the former rail bed between the railroad bridge crossing and the Flanders Road tunnel crossing.

I have no specific comments for the proposed culvert replacement under the Flanders Road crossing in Columbia. Nor do I have specific comments for improvements along the rail trail bed, with the exception to call out the undermanaged stormwater outfall discharge from a Route 66 Columbia location. During the mid-July 2021 intense and frequent rainstorm events it had discharged significant amounts of stormwater runoff down the wooded slope, eroding a widening gully and discharging across the existing rail trail bed a hundred yards or so east from the Flanders Road crossing.

The existing rail trail bed east of the Flanders Road tunnel crossing is in close proximity to a completed habitat conservation project conducted by the Fisheries Division, Habitat Conservation and Enhancement Program several years ago. That habitat restoration site along the Hop River streambank continues to be a

sensitive area within a dynamic river corridor section. It would be important to install an access gate or other controls to reduce inappropriate vehicle traffic that have historically used this rail trail segment from nearby uncontrolled locations off Route 66.

The Watersheds program has supported better utilization of the Department's access and management of the DOT-owned/controlled, DEEP managed Hop River Water Access site in the former DOT rest stop off Route 66 west of the Route 66 bridge crossing. Internal agreements were made several years ago to open up the formerly closed rest stop area to limited vehicle parking, DEEP fish stocking and Environmental Conservation vehicles. The Department then formally supported managed water access here to the Willimantic River as part of the Willimantic River Water Trail (a federally designated National Recreation Trail) that is also an officially designated Connecticut Greenway. This site now contains an installed information kiosk provided by The Last Green Valley, Inc and managed by the Water Trails advisory committee; I am the designated Department representative to The Last Green Valley, Inc. Board of Directors. That former rest stop area also has great potential to connect users to the Hop River State Park Trail, within 1,000 feet of the eastern end of the former railroad bridge over the Willimantic River (and now open as a re-decked bridge for a very popular urban recreational trail component). This may be the location indicated in the scoping notice for a potential parking lot to support the Hop River State Park Trail. The final DOT design for this rail trail segment, elevated above the unimproved DEEP managed water access area, should provide for a future formal connection that is protective of water quality and habitat conditions within this Willimantic River Water Access parcel.

/ET