

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

From: Linda Brunza- Environmental Analyst

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Date: 2/19/2021

Email: Linda.Brunza@ct.gov

Subject: Bridge replacement project, Hop River Road, Coventry and Columbia

The following comments are submitted for your consideration.

DEEP State Parks and Trails/ Hop River use

The Hop River State Park Trail is approximately 500 feet from the bridge. During the anticipated 6-8 months of construction, the Hop River Road parking access to the state park trail will only be accessible from the north/upper side of the road, with a several mile detour through Coventry. Trail users coming through this area from above or below locations may not realize the detour situation if they have not parked there. To promote proper trail planning, DEEP recommends that DOT post temporary signage prior to and during construction at a couple of other Hop River State Park trail junction locations (e.g. Kings Road, Coventry, Parker Bridge Road, Andover) to alert through-trail users. DEEP recommends checking with the Connecticut Greenway Council to post a notice if they actively maintain a website. Hop River State Park Trail is a popular hiking area especially during current COVID pandemic. To coordinate signage and post notices on DEEP's website, please contact Laurie Giannotti at Laure.Gianotti@ct.gov.

DEEP recommends that DOT include standard DOT design for 1-2 stream crossing signs on the new bridge, identifying the Hop River. There is a history of recreational watercraft use of the Hop River that informally portage around the adjacent dam. Anecdotal evidence suggests paddler uses include both quick water times (there are some Class I and II sections at times) and slower river flow times. There is no official water trail or management along this Hop River segment. However, DOT design and outreach should consider notifying the informal paddling and fishing community that temporary construction period barriers to portage or river access at the bridge may occur. The Thames River chapter of Trout Unlimited may be an appropriate angler contact. Further, DEEP Fisheries has stocked trout [at this location](#) and should be notified for possible stocking schedule modifications.

Watershed/ Water Quality

Hop River Road in Coventry is a paved road leading up to the existing river bridge crossing, there is no curb and water sheet flows to shed water off the traveling road surface. Hop River Road in Andover is also paved leading up to the existing river bridge crossing and uses a combination of sheet flow and partial paved ditch to control direct runoff into the down gradient Hop River. Connecticut ground water classification of GA along the Andover shore of this bridge project area may not be fully meeting Connecticut water quality standards. Such is reflected in review of

historic and some current land uses in the area, and no source or cause has been specifically identified with the current bridge crossing infrastructure. 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 the new bridge project site. This recommendation supports the quality of the receiving 11.87-mile-long Hop River segment (CT3108-00_01a), which has a surface water classification of A and in recent water quality assessment cycles has fully supported designated uses of Aquatic Life and for Recreation.

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](#) 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](#).

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. DEEP Inland Fisheries can be contacted at 860-424-3474. Since this area is one of the common fish stocking sites, DOT should contact Fisheries to discuss stocking locations if this area is impacted by construction.

Threatened and Endangered Species

DEEP Wildlife Division maintains the Natural Diversity Database (NDDB) maps. DEEP Wildlife Division confirmed that an application was submitted by DOT for this project. Although the application is under review and more specific recommendations are forthcoming, the following general comments are offered:

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) 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 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