

To, Ken-Taro Plude, Project Engineer, Department of Transportation
2800 Berlin Turnpike, Newington CT

From: Linda Brunza- Environmental Analyst

Telephone: 860-424-3739

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Email: Linda.Brunza@ct.gov

Subject: Bridge replacement project, Stiles Bridge over the Scantic River, East Windsor

Staff at DEEP has reviewed the scoping notice for the replacement of Bridge No.01524 which carries Route 191 over the Scantic River in East Windsor.

The following comments are submitted for your consideration.

Fisheries Division

The Scantic River supports a diverse fish community of resident inland species including Blacknose Dace, Longnose Dace, Common Shiner, Largemouth and Smallmouth Bass, Chain Pickerel, wild Brown Trout as well as a number of diadromous species including Alewife, Blueback Herring, Sea Lamprey, and American Eel. The project site is one of the Fisheries Division's stocking locations for thousands of Brown Trout and Rainbow Trout.

In previous meetings with DOT, the recommendations below were discussed and noted. Coordination with DEEP Fisheries will continue through design/ build.

Comments/Recommendations:

1. Two municipally owned open space parcels abut the southern side of the bridge right-of-way and extend downstream, providing nearly three quarters of a mile of riverfront access. If the Town of East Windsor is amenable, there could be an opportunity to establish a formal or informal access point adjacent to the bridge to allow fisherman, hikers, etc. to enjoy this section of the Scantic River.
2. The existing crossing allows for unrestricted fish passage at this location and the proposed full bridge replacement is expected to maintain this condition. The Fisheries Division will provide additional comments when a preliminary design is available for review.
3. It is important that proper erosion and sedimentation controls be installed and maintained throughout the duration of this project. Care should be exercised so as not to increase turbidity levels. As a best management practice, any unconfined instream work within the Scantic River should be restricted to the period from July 1 to September 30, inclusive. This prohibition does not apply to the installation or removal of water control structures such as cofferdams.
4. Any water control structures used at this site should allow for the free upstream and downstream passage of fish and no more than one half of the river channel should be blocked at any given time.

5. Most of the diadromous fish species found at this site migrate primarily at night, therefore loud construction related activities should be prohibited from sunset to sunrise during the diadromous fish migration period from April 1 to June 30. Loud construction activities are defined as those with noise levels exceeding 90 decibels, as measured at the water's surface at the point closest to the source of the noise.

6. Bright lights may also interfere with diadromous fish migrations; therefore, construction lights should not be directed down on to the water's surface during the period from April 1 to June 30,

8. The Fisheries Division would also like the opportunity to review the proposed bridge design and water control plan before final approval to ensure that there will be no major impacts to fisheries resources.

Land and Water Resources Division

A map of this area shows that different project components could impact the Scantic 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](#).

Wildlife Division

DEEP's Wildlife Division confirmed that the site is within a Natural Diversity Database Area. The Wildlife Division is concerned that in-stream work could harm freshwater mussels. A mussel survey and recovery/relocation effort may be required. The applicant must submit a *Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to NDDB for further review. Additional information concerning NDDB reviews and the request form may be found on-line at [NDDB Requests](#).

Air Management

DEEP Bureau of Air Management 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.

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
Robin Blum
Laura Saucier
Bruce Williams
Matt Goclowski