

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

From: Linda Brunza- Environmental Analyst

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Date: 6/14/2021

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Subject: Bridge replacement project, West Cedar Street over the Five Mile River, Norwalk

Staff at DEEP has reviewed the scoping notice for the replacement of Bridge No. 04152 which requires a full bridge replacement. The following comments are submitted for your consideration.

Fisheries Division

Sampling by the Fisheries Division near the project site has documented the presence of typical Connecticut warmwater fish species including American Eel, Blacknose Dace, Largemouth Bass, Pumpkin Seed, and White Sucker. There is an impassible barrier downstream, the Chasmer Dam, that blocks the passage of all migratory fish species except for the American Eel. That barrier is under consideration for removal or fish ladder installation but will be intact when the Cedar Street work is being done.

The Fisheries Division recommends the following:

1. The existing channel under the bridge is passable to all fish species and is composed of natural substrate. Any work done at the site should maintain these conditions, including stream width and the position of the thalweg.
2. To protect downstream fisheries habitat, all best management practices for erosion and sedimentation control should be observed throughout the construction period. Upon completion, all disturbed areas should be stabilized and planted with native vegetation.

Coordination with DEEP Fisheries will continue through design/ build.

Land and Water Resources Division

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. Staff from the Land and Water Resources Division will be able to clarify if this project would qualify for Self-Verification or a Preconstruction Notification during the DOT's Project Management Meetings. Please note that the Army Corps of Engineering General Permit is expiring in August and requirements for each level of permitting is subject to change.

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 not within a Natural Diversity Database Area or near any Wildlife Management Areas. Additional information concerning NDDDB reviews and the request form may be found on-line at [NDDDB 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
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