

**STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL ASSESSMENT CHECKLIST**

Date: April 5, 2022

Project Name: Hop River State Park Trail / CTDOT Project Number 30-97

Municipality: Columbia and Coventry

Staff Contact: Kevin Fleming

This assessment is being conducted in conformance to the Connecticut Department of Transportation's Environmental Classification Document (ECD) to determine Connecticut Environmental Policy Act (CEPA) obligations.

Project Description:

The project is located on the existing Hop River State Park Trail, beginning at its current terminus on Kings Road in Coventry and extending easterly to the trail bridge over the Willimantic River in Columbia. The total length of the project is approximately 4,400 feet.

The project includes the construction of a multi-use trail with a 10-foot-wide stone dust surface. Also included in the project, is the construction of a new bridge over the Hop River, just east of Kings Road in Coventry, to replace a former railroad bridge (No. 2.53) that has failed, the replacement of a short bridge (referred to as a "cattle crossing") with concrete pipes, and the replacement of a culvert under Flanders Road in Columbia with a larger one. Signage, fencing, bollards, landscaping, and access control gates will be installed throughout the project limits as appropriate. The addition of a parking lot to the project is being considered north of where Route 66 passes over the Willimantic River. The bridge and the trail lie within right of way owned by the Connecticut Department of Transportation (CTDOT) and the Connecticut Department of Energy and Environmental Protection (CTDEEP).

This project was scoped in the *Environmental Monitor* on June 8, 2021 and the public comment period remained open until the close of business on July 9, 2021. CTDOT received comments from one State agency – CTDEEP. No comments were received from the public during the public scoping period. A CEPA scoping meeting was not held as no requests were received to hold one. A Public Informational Meeting was held, however, on June 25, 2019 and a link to the meeting minutes is included within the scoping notice for this project.

The proposed action is non-site specific, or encompasses multiple sites;

Current site ownership: N/A, State; Municipal, Private,
 Other: Please Explain.

Anticipated ownership upon project completion: N/A, State; Municipal, Private,
 Other: Please Explain.

Locational Guide Map Criteria:

<http://ctmaps.maps.arcgis.com/apps/webappviewer/index.html?id=ba47efccdb304e02893b7b8e8cff556a>

Priority Funding Area factors:

- Designated as a Priority Funding Area, including Balanced, or Village PFA;
- Urban Area or Urban Cluster, as designated by the most recent US Census Data;
- Public Transit, defined as being within a ½ mile buffer surrounding existing or planned mass transit;
- Existing or planned sewer service from an adopted Wastewater Facility Plan;
- Existing or planned water service from an adopted Public Drinking Water Supply Plan;
- Existing local bus service provided 7 days a week.

Conservation Area factors:

- Core Forest Area(s), defined as greater than 250 acres based on the 2006 Land Cover Dataset;
- Existing or potential drinking water supply watershed(s);
- Aquifer Protection Area(s);
- Wetland Soils greater than 25 acres;
- Undeveloped Prime, Statewide Important and/or locally important agricultural soils greater than 25 acres;
- Storm Surge Inundation Zone(s);
- 100 year Flood Zone(s);
- Critical Habitat;
- Locally Important Conservation Area(s),
- Protected Land (list type): Enter text.
- Local, State, or National Historic District(s).

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of Environmental Significance (Direct/Indirect)

1. Impact on water quality, including surface water and groundwater

Water Quality – No negative impacts are anticipated. All CTDOT projects must conform to the CTDOT Standard Specifications for Roads, Bridges, Facilities, and Incidental Construction Form 818. Section 1.10.03, Environmental Compliance, specifically deals with water pollution control and Best Management Practices (BMP). Additionally, a Water Quality Certificate will be required from CTDEEP pursuant to Section 401 of the Clean Water Act.

Surface Water – No negative impacts are anticipated. CTDEEP indicated that surface water quality classification for the Hop River is “A” and “B” for the Willimantic River and that the project final design elements should be consistent with the Connecticut Water Quality Standards and Criteria for these classifications. Coordination with CTDEEP will occur as needed.

Stormwater - No negative impacts are anticipated as Best Management Practices will be employed regarding stormwater management. Registration under *CTDEEP’s General Permit for Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* will be completed if required. Any CTDOT project that changes impervious area, stormwater drainage patterns pre to post construction shall meet the requirements of the CTDEEP’s General Permit for the Discharge of Stormwater from Department of Transportation Separate Storm Sewer Systems (DOT MS4 Permit) and submit a CTDOT MS4 Designer Worksheet.

Groundwater – No negative impacts are anticipated. All CTDOT projects conform to the CTDOT Standards Specifications for Roads, Bridges, Facilities and Incidental Construction Form 818. Section 1.10.03, Environmental Compliance, specifically deals with water pollution control and Best Management Practices. Groundwater classification is “GA” throughout the project site and as indicated in CTDEEP’s comments, the final design elements should be consistent with Connecticut Water Quality Standards. As design progresses, a testing plan will be developed to assess groundwater in any areas within which intrusive construction activities are proposed. Remediation measures will be put in place to mitigate potential impacts if contaminated groundwater is confirmed by the testing.

2. Effect on a public water supply system - No negative impacts are anticipated. The project is not located within a source of public drinking water.

3. Effect on flooding, in-stream flows, erosion or sedimentation:

Flooding – No negative impacts are anticipated. The project is located within a FEMA-mapped flood zone, therefore CTDEEP Flood Management Certification will be obtained.

In-stream flows – No negative impacts are anticipated.

Erosion or Sedimentation – No negative impacts are anticipated. All work will be consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.

4. Disruption or alteration of an historic, archaeological, cultural, or recreational building, object, district, site or its surroundings – In a letter dated November 24, 2020, the CT State Historic Preservation Office (CTSHPO) concurred with CTDOT’s recommendation that the project would result in an Adverse Effect to Historic Properties due to the replacement of Bridge No. 2.53 which is eligible for listing in the National Register of Historic Places (NRHP). In a letter dated April 1, 2021, CTSHPO identified the following mitigation measures to resolve the adverse effect:

- CTDOT, at its expense, shall document Bridge No. 2.53 prior to demolition. Documentation shall meet the state-level standards of the CTSHPO and, at a minimum, include indexed high-quality photographs, a site plan, and narrative text. Final documentation shall be provided to CTSHPO for permanent archiving and public

accessibility. A copy is also to be made available to the Coventry Historical Society and the Columbia Historical Society. Documentation shall be submitted and accepted by CTSHPD prior to any demolition or construction.

- CTDOT shall retain existing bridge elements to the extent possible and incorporate these elements, including existing stone, into the new bridge abutments at the discretion of CTDOT's Qualified Cultural Resources Staff/ National Register Specialists.

Subsurface archaeological testing was performed in August 2020; however, it was determined that no further archaeological testing was warranted since no intact archaeological resources were discovered. CTDOT will continue to coordinate with the CTSHPD.

- 5. Effect on natural communities and upon critical species of animal or plant and their habitat; interference with the movement of any resident or migratory fish or wildlife species** – No negative impacts are anticipated as CTDOT will employ established Best Management Practices. The project takes place within a mapped NDDDB area and coordination with CTDEEP will take place. According to CTDEEP there are record of turtles just upstream from the bridge. CTDEEP recommends fencing in the construction area to keep turtles out, and in-stream ground disturbance work should be done during the turtle active season. Maintaining in-stream overwintering areas, such as tree roots, fallen trees, and logs can assist in protecting turtle habitat. Additionally, CTDEEP is not aware of any freshwater mussel data in the stream; if dewatering is needed and the streambed exposed, CTDEEP would like the opportunity to check for freshwater mussels and salvage any that could perish. CTDEEP Fisheries will also work with CTDOT during the permit review process to ensure fisheries resources and habitats are protected. Time of year restrictions will be considered if there is in-stream work.
- 6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact** – No negative impacts are anticipated. Land use in the vicinity of the project limits and the potential for excess soil as a result of construction will be considered during project design. Should there be any sites with known contamination issues in the vicinity of the project, additional study will be performed within the project area and/or adjacent right-of-way. As design progresses, a testing plan will be developed to assess soil and groundwater in any high-risk areas within which intrusive construction activities are proposed. Remediation measures will be put in place to mitigate potential impacts if contaminated soils or groundwater is confirmed by the testing. If needed, registration under CTDEEP's *General Permit for Contaminated Soil and/or Sediment Management* (Staging & Transfer) will be obtained, and soil management will be conducted in accordance with the General Permit.
- 7. Substantial aesthetic or visual effects** – No negative impacts are anticipated. CTDOT will work with CTSHPD to implement suggested mitigation, including potential retaining existing bridge elements.
- 8. Inconsistency with (a) the policies of the State Plan of Conservation and Development developed in accordance with Section 16a-30 of the CT General Statutes, (b) other relevant state agency plans, and (c) applicable regional or municipal land use plans** – No issues - CTDOT adopted a programmatic approach for meeting the requirements of CGS Chapter 297 Section 16a-

31(a) and Chapter 297 Section 16a-35(c) and 16a-35(d) for determining consistency of proposed actions with the Statewide Plan of Conservation and Development, as indicated in a memo from CTDOT to OPM, dated March 2015. This project type (Non-Motorized User Accommodations) is exempt from the consistency requirements of CGS Sec. 16a-31(a) and therefore is considered consistent with the Statewide Plan of Conservation and Development, as indicated in said memo.

- 9. Disruption or division of an established community or inconsistency with adopted municipal and regional plans, including impacts on existing housing where sections 22a-1b(c) and 8-37t of the CGS require additional analysis** – No negative impacts are anticipated. This project is not in conflict with any municipal or regional plans.
- 10. Displacement or addition of substantial numbers of people** – No negative impacts are anticipated. This project does not involve the displacement or addition of people.
- 11. Substantial increase in congestion (traffic, recreational, other)** – No negative impacts are anticipated.
- 12. A substantial increase in the type or rate of energy use as a direct or indirect result of this action** – No negative impacts are anticipated. No new construction of any buildings is proposed. The project is not anticipated to result in any change to land use or traffic conditions that would impact energy use.
- 13. The creation of a hazard to human health or safety** – No negative impacts are anticipated. The project will be reviewed for the potential of having hazardous material constituents in existing infrastructure components. Testing will be performed on any suspect materials. Should the presence of hazardous materials be confirmed through the testing, specifications to properly handle and dispose the hazardous materials will be incorporated into the design to mitigate potential health or safety. Therefore, significant impacts associated with hazardous materials or waste sites are not anticipated.
- 14. Effect on air quality** - No negative impacts are anticipated. The project is located within the boundaries of the portion of the state that has been classified as attainment for carbon monoxide (CO), attainment for PM 2.5, non-attainment for Ozone, and attainment for PM 10. A project level Air Quality Conformity Determination is not required, nor is an analysis or discussion of Mobile Source Air Toxics, as this project is exempt under the Clean Air Act. Any potential temporary impacts during construction can be avoided or limited by proper operation of construction equipment and adherence to regulations limiting idling of engines.
- 15. Effect on ambient noise levels** - No negative impacts are anticipated. The project was reviewed by CTDOT's Office of Environmental Planning and it was determined that no noise study would be required. Any noise impacts during construction will be temporary and will be minimized to the best extent practicable by compliance with CTDOT Standard Specifications for Roads, Bridges, Facilities and Incidental Construction Form 818 regarding construction noise pollution:

"1.10.05 – Noise Pollution: The contractor shall take measures to control noise intensity caused by his construction operations and equipment, including but not limited to equipment used for drilling, pile driving, blasting, and excavating or hauling. All methods and devices employed to minimize noise shall be subject to

continuing approval of the Engineer. The maximum allowable level of noise at the nearest residence or occupied building shall be 90 decibels on the "A" weighted scale (dB(A)). Any operation that exceeds this standard will cease until a different construction methodology is developed to allow work to proceed within the 90-dB(A) limit."

- 16. Effect on existing land resources and landscapes, including coastal and inland wetlands** – No negative impacts are anticipated. Any activity within federally regulated wetland areas or watercourses may require a permit from the US Army Corps of Engineers pursuant to Section 404 of the Clean Water Act. It is anticipated that this project will require a Section 404 General Permit and therefore a Section 401 Water Quality Certification will be required from CTDEEP.
- 17. Effect on agricultural resources** – No negative impacts are anticipated.
- 18. Adequacy of existing or proposed utilities and infrastructure** – No negative impacts are anticipated.
- 19. Effect on greenhouse gas emissions as a direct or indirect result of the action** – No negative impacts are anticipated. Construction phase impacts on greenhouse gas emissions will be limited. Any potential temporary impacts during construction can be avoided or limited by adherence to regulations limiting idling of engines.
- 20. Effect of a changing climate on the action, including any resiliency measures incorporated into the action** – No negative impact is anticipated. The project is located outside of the coastal boundary and will not be exposed to climate change hazards.
- 21. Any other substantial effect on natural, cultural, recreational, or scenic resources**- No other substantial effects are anticipated.
- 22. Cumulative effects** – This project does not involve any cumulative effects that have the potential for significant effects on the environment.

Conclusion:

After examining any potential environmental impacts and reviewing all comments received, CTDOT has concluded that the preparation of an Environmental Impact Evaluation (EIE) will not be required for the Hop River State Park Trail project. Publication of this document to the *Environmental Monitor* shall satisfy the agency's responsibilities under Section 22a-1a-7 of the RCSA.

During the comment period, CTDOT received comments from one State agency (CTDEEP). No comments were received from the public. Below is a synopsis of the comments received; comments are addressed in the appropriate sections above where needed. CTDOT will continue to work with CTDEEP as the project progresses.

CTDEEP State Parks and Trails/Hop River Trail

Hop River State Park Trail is a popular hiking area, please continue to work with CTDEEP staff from State Parks Division for the project, including posting notices and for signage.

Inland Wetlands and Watercourses

A map of the 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. If a permit is required from the USACOE, a Water Quality Certificate will also be required from CTDEEP pursuant to Section 401 of the Clean Water Act.

Inland Fisheries

CTDEEP Fisheries will work with 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 that 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.

Threatened and Endangered Species

CTDEEP Wildlife Division maintains the Natural Diversity Database (NDDB) maps. No application was submitted by CTDOT at the time of scoping. The following general comments are offered based on the review of the project:

- There are records of turtles just upstream from the bridge, CTDEEP recommends fencing in the construction area to keep turtles out.
- In-stream ground disturbance work should be done during the turtle active season.
- Maintaining in-stream overwintering areas, such as tree roots, fallen trees, logs, crevices, can assist in protecting turtle habitat.
- CTDEEP is not aware of any freshwater mussel data in this stream. If dewatering is needed and the streambed is exposed, CTDEEP would like the opportunity to check for fresh-water mussels and salvage any that could perish.

Air Quality

CTDEEP typically encourages the use of newer off-road construction equipment that meets the latest (EPA) or California Air Resources Board (CARB) standards. If that 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 encourages the use of newer on-road vehicles that meet either the latest EPA or 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 RCSA limits the idling of mobile sources to three (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.

Additional Comments from CTDEEP's Water Planning and Management Division

The project site is located within two subregional watersheds, with the vast majority within the Hop River subregional and the extreme eastern end within the Willimantic River subregional.

Surface water quality classification for Hop River is "A" and "B" for the Willimantic River. Ground water classification is "GA" throughout the project site. The final design elements should be consistent with the CT 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. 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 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 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 CTDEEP Watersheds program is supportive of the clear span bridge conceptual design for this bridge replacement.

The existing rail trail bed east of the Flanders Road tunnel crossing is in close proximity to a completed habitat conservation project conducted by CTDEEP Fisheries several years ago. This continues to be a sensitive area. 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 CTDEEP'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.