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Date: January 25, 2021

To: Town of Coventry Inland Wetlands Commission
Todd Penney, Town Engineer and Wetland Agent

From: Joanna Shapiro, Executive Director *Joanna Shapiro*

Re: Wetlands Review for South Street Reconstruction and Pedestrian Improvements

District staff inspected the site on January 12, 2021. Staff reviewed a 5-sheet set of plans, "Permit Plans: South Street Reconstruction and Pedestrian Improvements," dated December 11, 2020, prepared by BL Companies for the Town of Coventry. Additionally, 2-sheet plan set, "Roadway Plan" also prepared by BL Companies and dated December 11, 2020, was later reviewed electronically. The "Wetland Evaluation and Mitigation Recommendations" report for the site, prepared by Davison Environmental, LLC for BL Companies, dated December 13, 2020, was also reviewed.

The project plans depict reconstruction and expansion of South Street, including integration of a pedestrian sidewalk. Based on the Wetland report, 5,600 square feet of wetlands would be directly impacted by the proposed activity. The Town of Coventry Inland Wetlands Agency has determined that this application constitutes a Significant Impact, warranting a public hearing, which has specific regulatory implications.

At the town's request, this review is focused on the proposed development relative to wetland resources.

Wetland Resources, Proposed Direct Impacts, and Mitigation

The District generally concurs with the findings of the Wetland report, which identifies two distinct categories of on-site wetlands, varying in terms of wetland function. The roadside drainage swale is a created wetland, used to convey stormwater, and also likely performs some sediment/pollutant attenuation. The forested wetland, which includes an intermittent watercourse that crosses under South Street, is a natural wetland system of higher function and value. The District supports the recommendations of the Davison report, to minimize disturbance within the forested wetland, which is not easily replicated on-site.

Additionally, the roadside drainage swale and forested wetland both drain north via the intermittent watercourse, ultimately feeding the Skungamaug River. Effort should be made to preserve and improve water quality to the extent that is feasible and prudent. New grass-lined swales are proposed, to replace the function that will be lost by elimination of the existing roadside drainage swale wetland. The District concurs with the recommendations of the Wetland report, to incorporate further water quality measures into the design of these swales to improve their function (check dams, dense native plantings), as well as structural measures within the roadway to treat polluted stormwater runoff (deep sump hooded catch basins and/or possibly hydrodynamic separators if project budget and town staff maintenance capabilities allow for them), to preserve and enhance water quality. All proposed measures should be accompanied by an Operation and Maintenance plan, to be followed post-construction. If designed and constructed as recommended in the Wetland report, and adequately maintained, these new swales may replace and even improve the function that will be lost by the impact to the existing roadside swales.

While mitigation is proposed for the direct impact to the roadside swale, no mitigation has been proposed for direct impacts to the forested wetland. The Wetland report states that the proposed grass swales “will largely replicate the function of these existing roadside swales”, and recommends minimizing impacts to the higher value forested wetland and watercourse, yet does not address replication of these functions, nor does it determine whether the proposed work will likely represent an adverse impact to wetlands and watercourses. The direct impact to the forested wetland should be addressed.

Indirect Impacts – Erosion and Sedimentation Control

While the project plans and Wetland report identify direct wetland impacts, indirect wetland impacts resulting from construction of the proposed roadway improvements have not been adequately addressed. An Erosion and Sedimentation Control Plan has not yet been provided. From the project plans, it appears as though the existing pipe that conveys the intermittent watercourse beneath South Street will be replaced during construction. Additionally, this pipe will either be extended (as shown on the plans), or an open-bottom culvert will be installed (as recommended in the Wetland report), to accommodate the wider road. A plan to dewater during construction (ideally during dry conditions as recommended in the Wetland report) and protect downstream resources from sedimentation should be submitted. Road work will involve filling within wetlands, and construction along approximately 190’ linear feet of forested wetland, which should be protected from sedimentation. An Erosion and Sedimentation Control Plan, in accordance with the *2002 CT Guidelines for Soil Erosion and Sedimentation Control*, should be provided.

Alternatives Analysis

An alternative assessment is a standard requirement of all wetland applications. According to Section 7, Application Requirements, of the Town of Coventry Inland Wetlands and Watercourses Regulations, all Applicants are required to present analysis of alternatives “which would cause less or no environmental impact to wetlands or watercourses” and to explain “why the alternative as set forth in the application was chosen” and further states “all such alternatives shall be diagramed on a site plan or drawing”.

Furthermore, since The Town of Coventry Inland Wetlands Agency (Agency) has determined that the proposed activity may have a significant impact on wetlands, Section 10.3 of the “Town of Coventry Inland Wetlands and Watercourses Regulations” requires the Agency to find “on the basis of the record that a feasible and prudent alternative does not exist”. The District has not received an alternatives assessment to review, yet is aware that the Town and project engineers are considering an alternative to the proposed extension of pipe to further convey the intermittent watercourse beneath the road extension. As recommended within the Wetland report, use of an open-bottom culvert would help to minimize disturbance to the higher value wetland/watercourse.

It is not clear from the submission whether possible widening of the road to the north rather than to the south was considered as an alternative to avoid significant direct wetland impacts. If use of the area north of the roadway for expansion of the roadway and construction of a sidewalk (and/or other configurations) was rejected as an alternative, the reasons should be documented for the record, and sufficient information should be provided to the Agency to determine whether a feasible and prudent alternative with less impact on wetlands and watercourses exists, as required by regulation.

Recommendations – In addition to recommendations described above (enhanced Water Quality measures, Operation and Maintenance Plan, assessment/mitigation of direct impacts to the forested wetland, Erosion and Sedimentation Control Plan, Alternatives Assessment), all measures recommended within the Wetland report should be formally incorporated into project plans, or included as conditions of approval.

Thank you for the opportunity to comment.