



**CONNECTICUT DEPARTMENT OF
ENERGY & ENVIRONMENTAL PROTECTION
OFFICE OF ENVIRONMENTAL REVIEW
79 ELM STREET, HARTFORD, CT 06106-5127**

To: Mark W. Alexander - Transportation Assistant Planning Director
DOT - Environmental Planning, 2800 Berlin Turnpike, Newington, CT 06131

From: David J. Fox - Senior Environmental Analyst **Telephone:** 860-424-4111

Date: December 23, 2011 **E-Mail:** david.fox@ct.gov

Subject: Old Farms Road Reconstruction, Avon

The Department of Energy & Environmental Protection has received the Notice of Scoping for the reconstruction, realignment or relocation of Old Farms, Scoville and Thompson Roads in Avon. The following comments are submitted for your consideration.

This project has had a long history and staff of the Inland Water Resources Division have been involved in reviewing numerous alternative alignments of Old Farms and Thompson Roads. This involvement included a field walk in December 2008 and several meetings with project stakeholders and regulatory agencies. The Notice of Scoping included only a location map depicting the existing roadways with project limits and are comments are necessarily general in nature.

The Department's recommendation for an upgrade of the roadways as close to the existing alignment as possible, expressed in the letter from Denise Ruzicka dated March 16, 2009 (attached), remains applicable. Such an alternative would maintain and protect the ecological functions and values of the Thompson Brook corridor. Various alignments to relocate the roadways that have been considered would necessitate further fragmentation of the exceptional wetlands, waters and habitat of this riparian corridor.

Upgrade alternatives in the Environmental Impact Evaluation should include thorough examination of a wide range of potential safety features that would allow pedestrian crossing(s) in order to facilitate plans of Avon Old Farms School to incorporate lands south of the roadways into their campus.

A request to the Natural Diversity Data Base (NDDB) by Environmental Planning Services regarding this project resulted in a letter dated July 22, 2011 identifying several listed species in the project area. These included: State Special Concern Species, *Passerculus sandwichensis* (Savannah sparrow); State Special Concern Species, *Sturnella magna* (Eastern meadowlark); and an historical record of State Special Concern Species, *Carex bushii* (Sedge). It does not appear that the habitat for the grassland birds, to the northeast of the school, would be impacted by the project. The historical record for the sedge was on the school campus, east of the intersection of Scoville and Old Farms Roads.

The NDDDB has subsequently received a report that the Eastern box turtle (*Terrapene carolina carolina*) had been historically found in the project area. Appropriate measures to mitigate potential impacts to turtles, both during construction and in the design of the improved roadways, should be proposed and implemented.

Thank you for the opportunity to review this proposal. If you have any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD
Robert Gilmore, DEEP/IWRD
Dawn McKay, DEEP/WD
Denise Ruzicka, DEEP/IWRD