

## **FEDERAL TRANSIT ADMINISTRATION** **ENVIRONMENTAL RE-EVALUATION CONSULTATION**

<i>For Agency Use</i>	
<i>Date Received:</i>	
<i>Recommendation by Planner or Engineer:</i> <input type="checkbox"/> <i>Accept</i> <input type="checkbox"/> <i>Return for Revisions</i> <input type="checkbox"/> <i>Not Eligible</i>	<i>Reviewed By:</i> <i>Date:</i>
<i>Comments:</i>	
<i>Concurrence by Regional Counsel:</i> <input type="checkbox"/> <i>Accept Recommendation</i> <input type="checkbox"/> <i>Return with Comments</i>	<i>Reviewed By:</i> <i>Date:</i>
<i>Comments:</i>	
<i>Concurrence by Approving Official:</i>	<i>Date:</i>

Please answer the following questions, fill out the impact chart and attach project area and site maps. Figures have been prepared for this Environmental Re-evaluation Consultation to show project revisions; the figures are numbered to correspond with similar figures presented in the EA/FONSI (e.g., Figures 2-14a and 2-14b compare with EA/FONSI Figure 2-14).

**PROJECT TITLE**

Walk Bridge Replacement Project  
Bridge No. 042884, Norwalk, Connecticut  
Connecticut State Project No. 0301-0176

**LIST CURRENT, APPROVED ENVIRONMENTAL DOCUMENTS (e.g. EIS/ROD, EA/FONSI, CE, RE-EVALUATION, etc.) If Re-evaluation, briefly describe.**

**Title:** Walk Bridge Replacement Project Environmental Assessment/Section 4(f) Evaluation and Environmental Impact Evaluation (EA/EIE)      **Date:** August 2016      **Type and Date of Last Federal Action:** Finding of No Significant Impact (EA/FONSI), July 17, 2017

<b>Title:</b>	<b>Date:</b>	<b>Type and Date of Last Federal Action</b>
<b>Title:</b>	<b>Date:</b>	<b>Type and Date of Last Federal Action</b>

**HAS THE MOST CURRENT AND OTHER PERTINENT APPROVED ENVIRONMENTAL DOCUMENTS BEEN RE-READ TO COMPARE PROPOSED PROJECT CHANGES?**

☐ **NO (STOP! The most current approved environmental document MUST be re-read prior to completing a re-evaluation.)**

☒ **YES      NAME:** Walk Bridge Replacement Project EA/EIE      **DATE:** August 2016

IS THE PROJECT CURRENTLY UNDER ☒ DESIGN OR ☐ CONSTRUCTION?

#### REASON FOR RE-EVALUATION

The design of the Walk Bridge Replacement Project has advanced since the 15% conceptual level that was analyzed in the EA/FONSI. This design advancement beyond 60% since the conceptual design has resulted in limited design modifications, while also refining the construction methodology of the Construction Manager/General Contractor (CM/GC). Additionally, since the issuance of the EA/FONSI, CTDOT has conducted multiple meetings with federal regulatory, state, and local regulatory agencies to refine project mitigation and advance permitting. These refinements in engineering design and construction methods necessitate a re-evaluation of potential environmental impacts.

#### DESCRIPTION OF PROJECT CHANGES OR NEW INFORMATION

The following presents a description of project modifications. Table 1 (page 19) presents an assessment of impacts due to the project modifications.

**Engineering Design Refinement - Walk Bridge Design.** The bridge type presented in the EA/FONSI and in the refined 60% design - two 240-foot long, side-by-side vertical lift spans across the Norwalk River – remains the same. Two of the navigation clearances of the vertical lift span have been refined since conceptual design.

The EA/FONSI indicates that the replacement bridge will have 60 feet of vertical clearance (from mean high water [MHW]) in the open position, and approximately 27 feet of vertical clearance in the closed position. A new fender system will be constructed approximately 10 feet from the new vertical lift span piers to protect them, providing 200 feet of horizontal clearance in the navigation channel. The bridge will be supported by new abutments at each end and five intermediate bridge piers, including the vertical lift bridge piers. Both piers supporting the vertical lift span towers will be placed outside the span length limits of the existing swing span, with no new foundation construction occurring in either the west or east navigation channels, as currently defined by the existing swing span. Both lift span piers will be located within the limits of the Norwalk River, with each pier consisting of a foundation comprised of four drilled shafts installed into bedrock.

In the 60% Design, the vertical and horizontal clearances of the replacement bridge are updated to reflect agency coordination, design refinement, and constructability analysis. In the 60% design, the replacement bridge still provides approximately 60 feet of vertical clearance (from MHW) in the open position and slightly less vertical clearance in the closed position - approximately 26 feet. The change in vertical clearance (movable span closed) from the EA/FONSI to 60% design is less than one foot. The proposed bridge provides less horizontal clearance - 170 feet of horizontal clearance between the limits of the pier protection system. Although this represents a 30-foot reduction from the EA/FONSI horizontal clearance, the proposed bridge's horizontal clearance does represent a substantial navigational increase from existing conditions and provides improved realignment with the Stroffolino Bridge. The design and construction of the two lift span piers, Pier 2 and Pier 3, are consistent with the EA/FONSI. The locations of the lift span piers remain unchanged from the previous arrangement and are located outside of the 170-foot navigation channel.

**Summary of Impact:** The proposed bridge plan in 60% design is consistent with the EA/FONSI and the impact of the changes in vertical and horizontal clearances is not significant. While the replacement

bridge's clearances are less than those proposed in the EA/FONSI, the proposed clearances still represent a substantial improvement from existing conditions.

**Engineering Design Refinement – Fort Point Street Bridge Relocation and Roadway Realignment.**

The EA/FONSI indicates that Fort Point Street Bridge will be replaced, including replacement of the existing superstructure and bridge abutments. The abutments could be constructed in the same general location as the existing bridge abutments or could be pulled back to accommodate a wider Fort Point Street below. Additionally, the vertical clearance of the new bridge structure could be increased. The replacement will not require parcel acquisitions but could require temporary easements. The EA/EIE states that CTDOT is refining its requirements for temporary easements.

Like the EA/FONSI design, in the 60% Design, Fort Point Street Bridge is replaced; however, the replacement bridge is located approximately 100 feet west of the existing bridge. After evaluating construction costs and risks and in response to the City of Norwalk's concerns with closing Fort Point Street during construction, CTDOT decided to replace the Fort Point Street Bridge via a realignment of the bridge and roadway. CTDOT determined that a realigned configuration of Fort Point Street improves construction staging and traffic control, reduces design and construction risks, and reduces costs. The new location for the Fort Point Street Bridge enables the existing roadway to remain in service during construction, as the new bridge and relocated Fort Point Street are constructed off-alignment while traffic is maintained on the existing Fort Point Street, with only very limited street closures and reduced impacts to the local roadway traffic network.

Just north of Van Zant Street, Fort Point Street is realigned to connect with South Smith Street to the north and existing Fort Point Street northeast of the railroad, providing a standard T-type intersection alignment which improves safety at the intersection of Fort Point Street and South Smith Street. Fort Point Street is reconstructed, and utilities and storm sewer in existing Fort Point Street are relocated to the new alignment. The existing bridge superstructure is dismantled and the area beneath the existing bridge, formerly occupied by Fort Point Street (the actual street), is backfilled. Figures 2-14a and 2-14b show the project limits per the refined 60% design, revised from EA/EIE Figure 2-14 (Attachment A). Attachment B provides a plan of the Fort Point Street Bridge relocation and roadway realignment.

Summary of Impact: The Fort Point Street Bridge relocation and roadway realignment presents new impacts; however, the impact of the changes is not significant. The realignment provides both short-term and long-term traffic improvements. During construction, the realignment reduces construction-related traffic impacts. In the long-term, the realignment improves the functionality and safety of the intersection of Fort Point Street and South Street. Realignment of Fort Point Street requires a full-parcel acquisition at 21 Fort Point Street (Parcel 3/1/11) and displaces an existing restaurant and multi-family structure, for a total displacement of one business and up to three residences in two buildings. Additionally, CTDOT requires temporary and permanent easements at 19 Fort Point Street (Parcel 3/1/27) and 15 Fort Point Street (Parcel 3/1/21), and a permanent easement at 2 South Smith Street (Parcel 3/3/1) for construction and/or operation of the relocated bridge and realigned roadway. The displacement of a business and up to three residences does not alter overall land use trends or zoning. The affected business and residences are located within a Census Tract identified as an Environmental Justice (EJ) Community of Concern. In the EA/FONSI, FTA determined that the proposed Project would not have disproportionately high and adverse effects on minority or low-income populations. The additional displacements due to the Fort Point Street Bridge and roadway realignment do not disproportionately affect EJ populations. Affected property owners will be provided with relocation assistance. CTDOT assessed the impacts of the Fort Point Street Bridge relocation and roadway realignment upon historic resources. These changes have substantially the same effect as the previous design. Mitigation of adverse effects stipulated in the project's Section 106 Memorandum of Agreement (MOA), consisting of documentation of the historic structures on the New Haven Line, including Fort Point Street Bridge, was completed in August 2018.

One other National Register of Historic Places (NRHP)-eligible property was identified in the Fort Point Street Bridge portion of the Area of Potential Effects (APE); the roadway realignment does not have adverse effects on this property. No other buildings within or adjacent to this portion of the APE were determined eligible for the NRHP. Based on the results of a Phase IA Assessment of the bridge relocation and roadway realignment, no intact archaeological resources will be impacted by the construction of the Fort Point Street Bridge relocation and roadway realignment. Further, no supplementary archaeological surveys are recommended, as they would be highly unlikely to document additional archaeological resources within the project area.

#### **Engineering Design Refinement – Additional Retaining Walls.**

The EA/FONSI indicates that west of Walk Bridge, new retaining walls will be required within the right-of-way (ROW) for 350 feet parallel to the tracks on both sides of the railroad, extending to approximately 250 feet east of the Washington Street Bridge. East of Walk Bridge, a new retaining wall will be constructed south of the railroad, parallel to the tracks, within the ROW.

In the 60% Design, the Walk Bridge approach has been further refined with the construction of new retaining walls west of Walk Bridge, as shown on Figures 2-14a and 2-14b. The area directly east of the west abutment of Walk Bridge is graded to accommodate future bridge maintenance access. Two additional walls are located under the west approach of Walk Bridge to accommodate this access; these walls (Walls 104 and 105) are located on either side of the railroad and within the ROW.

Summary of Impact: The additional retaining walls do not result in significant environmental impacts; the walls are located within the existing ROW and do not impact resources.

#### **Engineering Design Refinement – Railroad Power and Communication Signals.**

The EA/FONSI indicates that the existing Metro-North Railroad (MNR) communication utilities will require replacement and will potentially be located on the new bridge to the north or south of the movable span, transitioning to under the river at the navigation channel. Further, the EA/FONSI states that the MNR wires will be transferred to an underground duct bank and submarine cable early in construction.

Based on coordination with MNR, in the 60% Design, the routing of the traction power and communication and signals (C&S) power has been refined. In the permanent condition, the cables are located along an alignment on the south side of the bridge. Like the EA/FONSI, on the east side of the river, the existing overhead contact system (OCS) power cable transitions into a duct bank from Goldstein Place to the Norwalk River bank (at Parcel 3/1/25). It then transitions to a buried cable crossing the river via a cut and cover installation, to a duct bank on the west side of the river at 10 North Water Street (Parcel 2/19/2). CTDOT is continuing to evaluate options for temporary placement of the C&S power in coordination with MNR and the City of Norwalk.

Summary of Impact: Temporary impacts are anticipated due to the submarine crossing. An alternatives analysis was prepared to assess the installation alternative with the least amount of environmental impacts; a summary of the analysis is provided in Table 1. The U.S. Army Corps of Engineers (USACE) will review and approve the submarine crossing, including the appropriate depth below river bottom and management of dredged sediment, via the Section 10/Section 404 permit. To accommodate the duct bank at Parcel 2/19/2, CTDOT is expanding its permanent easement. The expansion of the easement does not result in significant environmental impacts.

#### **Engineering Design Refinement - Ferry and Research Vessel Dock Relocations.**

The EA/FONSI indicates that temporary relocation of the Sheffield Island Ferry and Maritime Aquarium vessel operations docks will be required. During construction, the existing docks will be temporarily closed and relocated elsewhere in Norwalk Harbor. The EA/FONSI indicates that CTDOT will coordinate



with water-dependent users, including the City of Norwalk, the Norwalk Harbor Management Commission, the Norwalk Seaport Association, and the Maritime Aquarium, to explore mitigation opportunities.

In the 60% Design, CTDOT has preliminarily identified a temporary location for the docks south of their existing location and is coordinating with the City of Norwalk and the Norwalk Harbor Management Commission to finalize their location during construction. Following bridge construction, new docks are re-constructed and vessel operations resume at their original locations. The City of Norwalk has requested that CTDOT retain one of the relocated docks as the final condition, providing a permanent water-dependent use and amenity for the public. CTDOT is finalizing the design of the vessel dock relocation, which will be included in permit applications.

Summary of Impact: Similar to the approach described in the EA/FONSI, CTDOT is coordinating the relocation of the docks in Norwalk Harbor with the City of Norwalk; the temporary location will be finalized as permitting progresses.

**Engineering Design Refinement – Revised Bridge Stormwater Design.**

The EA/FONSI indicates that Walk Bridge will include both open and closed drainage. The movable span will be open drainage, allowing runoff to fall directly into the Norwalk River untreated via the same means as the existing bridge. Drainage for both approach spans will consist of closed systems.

The Walk Bridge stormwater drainage in the 60% Design consists of open drainage for the movable span and closed systems for the approach spans. Water incorporated into the drainage systems is treated to the maximum extent practicable before discharge to the Norwalk River.

Summary of Impact: The approach to stormwater design in the 60% design is consistent with the EA/FONSI.

**Construction Methods Refinement – Revised Property Acquisitions and Development.**

The EA/FONSI indicates that Walk Bridge construction and operation will require the use of 22 parcels for temporary storage of construction equipment and supplies, contractor assembly and staging of equipment, contractor access to the Norwalk River and streets for transport of equipment and materials, contractor access to the railroad ROW, dredged/excavated sediment temporary storage and management, and access to the bridge for maintenance. The EA/EIE states that the sizes of temporary and permanent easements required for construction and maintenance of the Build Alternative will be determined and refined as design advances and in cooperation with property owners.

In the 60% Design, CTDOT will use the 22 parcels identified in the EA/FONSI for project construction. Refined construction methods have resulted in changes to three of the 22 parcels, as follows:

***68 Water Street (Parcel 2/84/19), 70 Water Street (Parcel 2/84/63), and 90 Water Street (Parcel 2/84/33).*** Parcels 2/84/63 and 2/84/33 were identified in the EA/FONSI as full-parcel temporary easements. Due to the development of the Marine Staging Yard and anticipated construction duration, CTDOT anticipates that these full-parcel temporary easements will be revised to full-parcel acquisitions. Additionally, CTDOT will construct a bulkhead waterside of 68 Water Street – 90 Water Street to provide a mooring location for barge deliveries of large assembly components and to transfer the equipment and materials from land to construction barges. When construction is complete, the bulkhead will remain in place for future use by the property owner.

**10 North Water Street (IMAX Theater) - Parcel 2/19/2.** The temporary easement for this parcel was identified in the EA/FONSI as Partial/To be Determined (TBD), and the parcel's permanent easement was identified as TBD for bridge operation and maintenance. To accommodate construction equipment and staging needs, CTDOT determined that it requires full use of this parcel as a temporary easement. CTDOT anticipates that an expanded permanent easement is needed to accommodate a duct bank for MNR power and communication signals, in addition to the previously-identified bridge operation and maintenance.

In addition to the 22 parcels identified in the EA/FONSI for construction and operation of the project, five temporary easements previously secured for advance projects are retained for the Walk Bridge Project, as follows:

**21, 23, 29, 41 North Main Street** (Parcels 2/24/3, 2/24/4, 2/24/5, and 2/24/8). The temporary easements on the North Main Street parcels, previously acquired for the Danbury Dock Yard Improvements Project, are required for Eversource transmission pole removal.

**10 Norden Place** (Parcel 3/17/40). The parking area at 10 Norden Place, previously acquired for the CP-243 Interlocking Project, is required for construction staging and track access.

Additionally, as previously cited in **Engineering Design Refinement – Fort Point Street Bridge Relocation and Roadway Realignment**, CTDOT requires a full-parcel acquisition at 21 Fort Point Street (Parcel 3/1/11); temporary and permanent easements at 19 Fort Point Street (Parcel 3/1/27) and 15 Fort Point Street (Parcel 3/1/21); and a permanent easement at 2 South Smith Street (Parcel 3/3/1) for construction and/or operation of the relocated bridge and realigned roadway.

**Summary of Impact:** The refined construction method in the 60% design results in changes to CTDOT's needs for acquisitions or easements at three of the 22 parcels identified in the EA/FONSI, as well as continued use of previously acquired construction easements. Following construction completion, temporary easements will be extinguished and CTDOT will restore the areas to preconstruction conditions. The acquired properties at 70 and 90 Water Street will be sold (as opposed to returning to pre-construction conditions). The sale of the waterfront property (90 Water Street) will give priority to water-dependent uses, as described in the EA/FONSI. The full use of Parcel 2/19/2 as a temporary easement will result in the displacement and demolition of the IMAX Theater. To mitigate impacts and compensate for the loss of the facility, CTDOT has entered into an agreement with the City of Norwalk allowing for the future development of a replacement facility. Table 1 provides additional information about the impacts of the closure and demolition of the existing facility and the construction and occupancy of the replacement facility. The expanded permanent easement on Parcel 2/19/2 may result in less available area for future development.

As noted in the EA/FONSI, as the project progresses, CTDOT may require additional, minor ROW easements for construction.

**HAVE ANY NEW OR REVISED LAWS OR REGULATIONS BEEN ISSUED SINCE APPROVAL OF THE LAST ENVIRONMENTAL DOCUMENT THAT AFFECTS THIS PROJECT? If yes, please explain.**

☐ NO  
☒ YES

Executive Order (EO) 13690, Establishing a Federal Flood Risk Management Standard and amending EO 11988, was revoked on August 15, 2017. EO 13690 required that the mechanical system of the bridge (defined as a critical action) be designed at least to 3 feet above the FEMA 100-year flood elevation [12

feet (NAVD88)]. EO 11988, Floodplain Management, requires that CTDOT assess the impacts of the bridge upon the 100-year flood elevation.

Connecticut Public Act No. 18-82, An Act Concerning Climate Change Planning and Resiliency, was approved by the Governor on June 6, 2018. The Act mandates the consideration of sea level change scenarios upon infrastructure planning and development. It requires the publication of a sea level change scenario for the State of Connecticut based upon the NOAA's analysis. On March 27, 2018, the Connecticut Institute for Reliance and Climate Adaptation (CIRCA) released a draft report, *Sea Level Rise in Connecticut*. The report modified the results of federal scenarios for sea level rise to include the effects of local conditions and indicates that the planning threshold for sea level rise for the Connecticut coast is 0.5 meters (approximately 2 feet). Further, Public Act No. 18-82 requires that State projects in coastal zones incorporate "flood-proofing," defined as incorporating an additional two feet of freeboard above base flood and any additional freeboard necessary to account for the most recent sea level change scenario. Freeboard is defined as a safety factor, expressed in feet above a calculated flood level, that compensates for unknown factors contributing to flood heights greater than the calculated height, including ice jams, wave actions, obstructions of bridge openings and floodways, the effects of urbanization on the hydrology of a watershed, loss of flood storage.

The following table compares the elevations of key bridge elements on the vertical lift bridge to the freeboard elevation level as required by Public Act No. 18-82. Freeboard elevation equals 14 feet NAVD 88, which is the base flood elevation (12 ft NAVD88) of the downstream face of the bridge plus an additional 2 feet, per Public Act No. 18-82. As shown in the table, the elevations of key bridge elements of the replacement bridge will be higher than the freeboard elevation mandate of Public Act No. 18-82.

Bridge Element	Elevation (+/-)	Meets Freeboard Elevation (El. 14)
Main Span Low Chord	29.14	yes
Eastern Approach Span Low Chord	24.1	yes
Western Approach Span Low Chord	23.1	yes
Control House Platform	24.0	yes
Electric Room Lowest Floor	156.0	yes
Machine Room (Drive Machinery & Motors) Lowest Floor	156.0	yes

Attachment C provides an assessment of existing and proposed Walk Bridge relative to Public Act No. 18-82. The passage of Public Act No. 18-82 does not affect the design of the replacement bridge; as currently designed, the replacement bridge complies with Public Act No. 18-82. The elevations of key bridge elements on the vertical lift bridge were compared to the freeboard elevation level and anticipated hurricane inundation levels with a 2-foot sea level rise as required by Public Act No. 18-82. The elevations of key bridge elements of the replacement bridge will be higher than the freeboard elevation mandate of Public Act No. 18-82. Compared to existing Walk Bridge, the resistance to hurricane inundation levels with a 2-foot sea level rise will be substantially improved with the replacement bridge.

**WILL THE NEW INFORMATION HAVE THE POTENTIAL TO CAUSE A CHANGE IN THE DETERMINATION OF IMPACTS FROM WHAT WAS DESCRIBED IN THE ORIGINAL ENVIRONMENTAL DOCUMENT FOR ANY OF THE AREAS LISTED BELOW?** For each impact category, please indicate whether there will be a change in impacts. For all categories with a change, continue to the table at the end of this worksheet (Table 1) and provide detailed descriptions of the impacts as initially disclosed, new impacts and a discussion of the changes. The change in impact may be beneficial or adverse.

**Transportation**

**Rail Transportation**

☐ Yes ☒ No

**Marine Transportation**

☒ Yes ☐ No

**Traffic, Transit and Parking**

☒ Yes ☐ No

**Land Use and Economics**

**Land Use and Zoning**

☒ Yes ☐ No

**Socioeconomics**

☒ Yes ☐ No

**Acquisitions, Displacements, & Relocations**

☒ Yes ☐ No

**Neighborhoods & Populations (Social)**

**Title VI and Environmental Justice**

☒ Yes ☐ No

**Visual Resources & Aesthetics**

☒ Yes ☐ No

**Air Quality**

☐ Yes ☒ No

**Noise & Vibration**

☐ Yes ☒ No

**Ecosystems (Vegetation & Wildlife)**

☐ Yes ☒ No

**Water Resources**

**Water Quality/Stormwater**

☒ Yes ☐ No

**Aquatic Resources, Species, Critical Habitats**

☒ Yes ☐ No

**Energy & Natural Resources**

☐ Yes ☒ No

**Geology & Soils**

☐ Yes ☒ No

**Hazardous Materials**

☒ Yes ☐ No

**Public Services**

☐ Yes ☒ No

**Utilities**

☐ Yes ☒ No

**Historic, Cultural & Archaeological Resources**

☒ Yes ☐ No

**Parklands & Recreation and Community Facilities**

☐ Yes ☒ No

**Construction**

☒ Yes ☐ No

**Secondary and Cumulative**

☒ Yes ☐ No

**Will the changed conditions or new information result in revised documentation or determination under the following federal regulations?**

Endangered Species Act	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Explanation included
Magnuson-Stevens Act	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Explanation included
Farmland Preservation Act	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Section 404-Clean Water Act	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Floodplain Management Act	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Explanation included
Hazardous Materials	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Section 106 National Historic Preservation Act	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Uniform Relocation Act	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Section 4(f) Lands	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Explanation included
Section 6(f) Lands	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Wild & Scenic Rivers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Coastal Barriers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Coastal Zone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Sole Source Aquifer	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
National Scenic Byways	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Other EO12898 – Environmental Justice	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Explanation included

**If you checked yes to any of these, describe how the changes impact compliance and any actions needed to ensure compliance of the new project:**

**Section 106 of the National Historic Preservation Act.** Investigations were conducted to determine if the Fort Point Street Bridge relocation and roadway realignment would impact above-ground historic resources or archaeological resources. New Areas of Potential Effects (APEs) were delineated for the proposed bridge and roadway realignment. Attachment D includes the supplemental cultural resource reports documenting these findings, which are summarized as follows:

The APE for above-ground resources includes the railroad ROW between the existing Fort Point Street Bridge and the location of the new bridge, the area where the realigned Fort Point Street will be constructed, and all associated street improvements to Fort Point Street and South Smith Street. Properties within or adjacent to the APE were evaluated for NRHP eligibility and for possible adverse effects. The only adverse effects on above-ground historic properties result from the loss of the historic bridge itself and the introduction of a modern element (the replacement bridge) within the historic rail line. These effects were considered in the Walk Bridge Project's previous Section 106 consultation and mitigation of the effects was included in the project's MOA. No buildings within or adjacent to the APE of the roadway realignment, including 21 Fort Street, are determined to be eligible for the National Register of Historic Places (NRHP). One property which is close to Fort Point Street (25 Van Zant Street) is eligible for the NRHP; however, the realignment will not adversely impact this property. None of the buildings within or adjacent to the APE that are less than 50 years old appears to have any "exceptional importance" that would make it eligible for the NRHP.

The APE for archaeological resources includes the railroad ROW between the existing Fort Point Street Bridge and the location of the new bridge, the area where the re-aligned Fort Point Street will be constructed, and all associated street improvements. A Phase IA survey was conducted to assess the potential for the proposed actions in the APE to affect undisturbed archaeological resources. Based on the results of the Phase IA Assessment, no intact archaeological resources will be impacted by the Fort Point Street Bridge relocation and roadway realignment. The only potential archaeological resources are

located at least 10 feet below the existing ground surface, are outside of the APE, and protected by 10 feet of disturbed overlying soil sequences.

**Uniform Relocation Act.** Modifications to design and construction methods will result in additional displacements. Due to the realignment of Fort Point Street, the project will require the acquisition of 21 Fort Point Street and displacement of a business and up to three residences. The full-parcel use of 10 North Water Street (Parcel 2/19/2) and 70 Water Street for project construction will displace/demolish the IMAX Theatre and a vacant warehouse, respectively. As described in the EA/FONSI, CTDOT will provide monetary and other relocation assistance to displaced property owners in accordance with the procedures outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Connecticut's Uniform Relocation Assistance Act. Relocation assistance could include relocation advisory services, moving payments, replacement housing payments, other payments related to commercial and residential moving costs and displacement, and assistance regarding availability and rental costs of comparable dwellings and suitable business replacement properties. Regarding the residential and business displacements at 21 Fort Point Street and the displaced use at 70 Water Street, it is anticipated that suitable relocation sites are available in the project vicinity.

To mitigate for the displacement of the IMAX Theatre, CTDOT has entered into an agreement with the City of Norwalk and is providing State funding for the future development of a replacement facility. In coordination with the City of Norwalk, the Maritime Aquarium of Norwalk is responsible for constructing the functional replacement facility. The replacement facility, a new 4D Theatre, will be built on the existing Maritime Aquarium Complex (10 North Water Street, Parcel 2/19/3). The Maritime Aquarium is progressing the development of the replacement facility, including conducting environmental evaluations and preparing permit applications. The new 4D Theatre is scheduled to be constructed and ready for occupancy by mid-December 2020; per CTDOT's agreement with the City, the existing IMAX Theatre will be vacated by December 31, 2020. CTDOT will continue to work with the Maritime Aquarium and the City to coordinate the schedules of the new facility construction and existing facility vacancy and demolition. Table 1 provides additional information on the functional replacement project.

#### **Additional Explanation for Regulations checked No:**

**Endangered Species Act, Magnuson-Stevens Act, Section 404-Clean Water Act.** Consultation with the National Oceanic and Atmospheric Administration/ National Marine Fisheries Service (NOAA/NMFS) and USACE is ongoing and will continue through design. Directives of the agencies will be incorporated in applications for required approvals and permits, listed in Attachment E.

**Floodplain Management Act, FTA Floodplain Management Conditions.** The project complies with EO 11988, Floodplain Management. To ensure that the proposed bridge will not have an adverse impact to the 100-year design floodplain, the proposed conditions hydraulic flood model (60% design) was compared to the existing conditions flood model. The results of the models indicate that the 100-year water surface elevations will be reduced throughout the study area, except at the downstream face of Walk Bridge where water surfaces will increase by 0.01 feet. Due to the removal of the large existing pivot pier, combined with the removal of the existing rest piers and the placement of the proposed lift span piers, the 100-year flood velocities will decrease between 0.02 and 0.38 feet/second through the project area. Therefore, the project will reduce the risk to future damage including property and loss of human life. During the 500-year storm event, modeling indicates that water surface elevations in the proposed conditions are within 0.03 feet of the existing elevations. Similar to the 100-year storm event, the proposed bridge will provide over 15 feet of under clearance during the 500-year storm event.

The project complies with FTA's floodplain management conditions. Since the receipt of the FONSI in July 2017, CTDOT has continued to coordinate with USACE and the U. S. Coast Guard (USCG)

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regarding the vertical and horizontal clearances of the replacement bridge; the USACE and USCG will approve the clearances as part of their permit review and approval. The vertical clearance of the replacement bridge (from approximately 27 feet in the EA/FONSI design to approximately 26 feet in the refined [60%] design) will not affect compliance with the Floodplain Management conditions (shown in italics), as listed in Grants CT-44-X004 and CT-2017-015-00:

*11a.) The Recipient agrees to follow Executive Order (EO) 11988, as amended, Floodplain Management, and any other guidance that FTA develops or amends regarding floodplain management, except as FTA determines otherwise in writing.* The project exceeds the requirements of EO 11988; it was designed to be in compliance with EO 13690, Establishing a Federal Flood Risk Management Standard, prior to the repeal of EO 13690.

*11b.) The Recipient agrees that it will not use FTA funds for any construction activity or any permanent repairs in an area delineated as a “special flood hazard area,” or equivalent, as labeled in FEMA’s most recent and current data source, unless, prior to seeking FTA funds for such action, the Recipient designs or modifies its actions in a manner that minimizes potential harm to or within the floodplain.* The project is located in a Special Flood Hazard Area (Zone AE). In the FONSI, FTA determined that based upon the hydraulic improvements anticipated with the project, no mitigation is proposed; further, permanent beneficial impacts to the floodplain are anticipated from the project. Advanced design has not changed the overall scope of the project since seeking FTA funds and the issuance of the FONSI. In accordance with the pending environmental permit applications to the USACE, USCG, and Connecticut Department of Energy and Environmental Protection (CTDEEP), the project has been designed to minimize or avoid impacts within the floodplain.

*11c.) The Recipient agrees that it will use the “best available information” as identified by FEMA, which includes advisory data such as Advisory Base Flood Elevations (ABFE), preliminary and final Flood Insurance Rate Maps (FIRM), and Flood Insurance Studies.* The project references the latest available FEMA maps and studies (effective July 2013). No ABFE mapping or preliminary studies are available for the project area.

*11d.) If FTA and the Recipient determine that FEMA data is unavailable or insufficiently detailed, then other Federal, State, or local data may be used as the “best available information.”* Not applicable; FEMA data is available and sufficiently detailed for the project area.

*11e.) If an FTA funded project activity is located in a floodplain, then the “best available information” requires a minimum baseline standard for elevation of no less than that found in FEMA’s ABFEs, where available, plus one foot (ABFE+1), or if that is not available, then a minimum baseline standard for elevation of no less than FIRM plus one foot (FIRM+1).* The project exceeds the FIRM + 1 requirement. In the vicinity of the bridge, the FEMA FIRM Base Flood Elevation (BFE) varies from elevation 10 to 14 feet NAVD88. The low chord elevation of the main span will be 29.1 feet NAVD88 while the eastern approach span will have a low chord elevation of 24.1 and the western approach spans will have low chord elevations of 23.1 feet NAVD88. The low chord is approximately 11 feet above the FEMA BFE

**Section 4(f) Evaluation/Exception to Section 4(f) Use.** The EA/FONSI identified ten candidate wetland mitigation sites; in the 60 % design, wetland mitigation design has been advanced and refined to six sites (while still retaining the required mitigation ratios as identified in the EA/FONSI). FTA previously issued an exception to Section 4(f) use for access through local parks for wetlands restoration, all of which were described in the EA/EIE. The City of Norwalk concurred with the requirements of the Section 4(f) exception on May 31, 2017. This is still valid.

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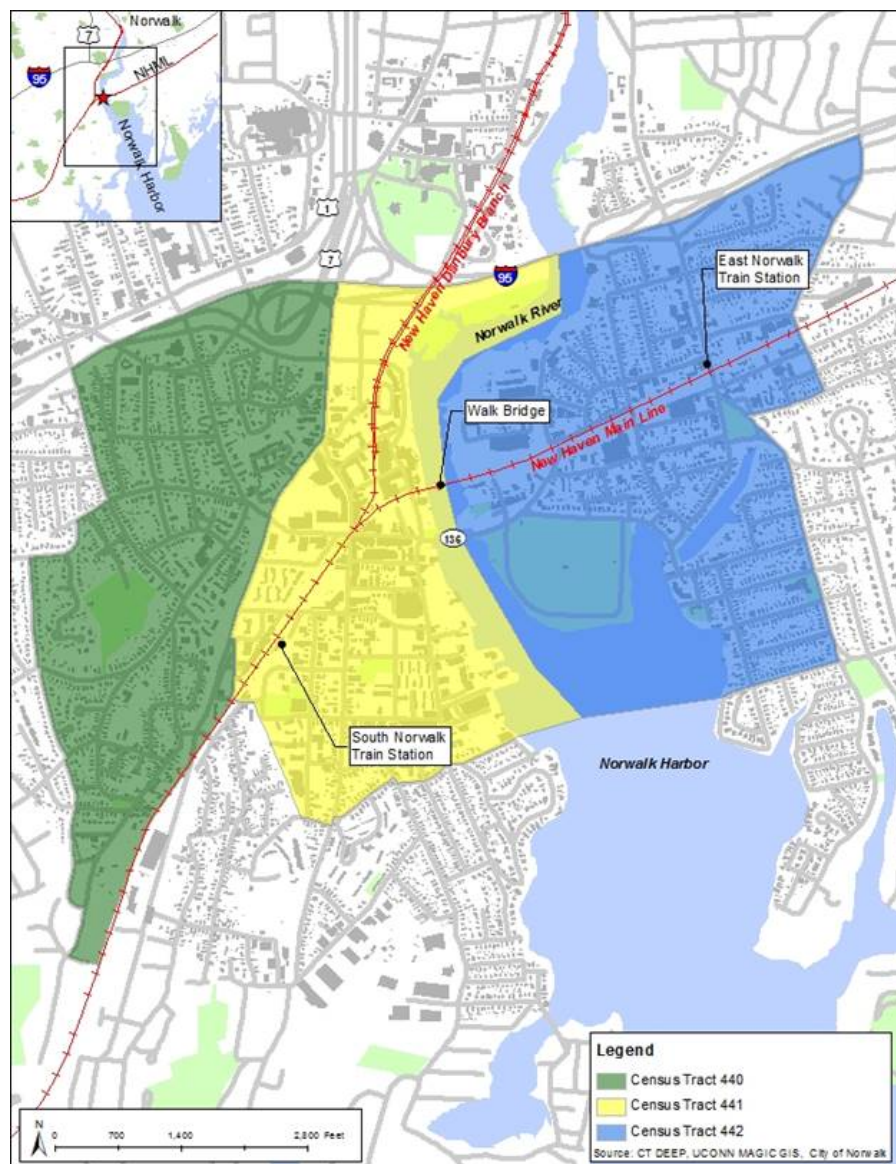
**EO 12898, Environmental Justice.** As stated in the EA/FONSI, the Walk Bridge Project area is within three U.S. census tracts – Tracts 440, 441 and 442 (Figure 1). Per the 2010 Decennial Census and 2008-2013 American Community Survey (ACS) data, the EA/FONSI identifies Census Tracts 440 and 441 as Title VI/Limited English Proficiency (LEP) areas, and the three census tracts as Environmental Justice (EJ) Communities of Concern. The following table provides updates to the ACS data; based on 2013-2017 ACS 5-Year Estimates, the three Walk Bridge area census tracts are both LEP areas and EJ Communities of Concern.

In accordance with South Western Region Metropolitan Planning Organization's (SWRMPO's) **2019-2045 Long-Range Transportation Plan (LRTP)** (Draft, March 2019), for SWRMPO planning efforts to comply with EJ mandates, characteristics of the area populations are evaluated against three criteria at the census tract level: 1) percent minority, measured by an MPO minority threshold of 33.8% of the population; 2) per capita income, measured by an MPO per capita income threshold of \$65,632; and 3) percent below poverty level, measured by an MPO below poverty level threshold of 7.2%. The criteria for a Limited English Language Proficiency (LEP) area is either 1,000 speakers or 5% of the population in an area with limited English proficiency.

<b>Characteristic</b>	<b>SWRMPO/Title VI Thresholds*</b>	<b>City of Norwalk</b>	<b>Tract 440</b>	<b>Tract 441</b>	<b>Tract 442</b>
Total Population	-----	88,537	6,380	3,350	3,997
Percent Minority	33.8 %	48.0%	77.8%	66.1%	59.4%
Per Capita Income	\$65,632	\$44,888	\$28,640	\$50,649	\$33,162
Percent Below Poverty Level	7.2%	9.2%	18.5%	18.9%	10.1%
Limited English Proficiency (LEP)	5%	16.0%	28.9%	27.8%	18.9%
*Threshold levels have increased from those identified in the EA/EIE.					



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**Figure 1 – Walk Bridge Project Census Tracts and EJ Communities of Concern**

Revisions to the Walk Bridge Project resulting from the 60% design will not create disproportionately adverse impacts to EJ Communities of Concern. As stated in the EA/FONSI, the project consists of replacing Walk Bridge and Fort Point Street Bridge on an existing rail corridor located in an EJ Community of Concern. All the properties to be acquired for the project, by parcel acquisition or easement, are therefore located within EJ Communities of Concern. The project will create a substantial benefit to New Haven Line (NHL) and Norwalk River users equally; the project represents an overall benefit to the entire community and is important to the continued economic prosperity of the region. Further, the Fort Point Street Bridge and roadway realignment will directly benefit the East Norwalk community, an EJ Community of Concern, by easing Walk Bridge Project construction impacts and by improving the functionality of the Fort Point Street/South Street interchange.

Eligible displaced owner-occupants and tenants are entitled to receive relocation benefits as outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. At this time, specific relocation benefits have not been determined. Should CTDOT proceed with the

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acquisition, the Division of ROW will conduct relocation surveys with all displaced individuals to fully assess their potential relocation benefits.

The Walk Bridge Program Communications Management Plan includes an EJ Outreach Plan. The three city-wide public information meetings held since the FONSI were advertised in minority language publications and translation services were offered for the meetings. CTDOT translates the project factsheets and annual Walk Bridge Program brochure into both Spanish and Haitian Creole (which are available at the public meetings and Welcome Center), and the project website is ADA-accessible and includes a Google translate feature for over 50 languages. Additionally, all program notices have been updated to include the following statements (provided in English, Spanish and Haitian/French Creole): *“The Walk Bridge Program offers translation services for all Spanish and French Creole speakers. Please contact the Program’s Public Information Office for more information by sending us an email at info@walkbridge.com, or calling (833) 462-9255 (GO2-WALK).”*

In anticipation of Walk Bridge construction, CTDOT is partnering with local community organizations that can provide insight on EJ communities in Norwalk. The following coordination meetings have been held in 2019:

- o Norwalk Hispanic Chamber of Commerce – March 20
- o Norwalk Transit District – March 29
- o Norwalk Housing Authority – April 12
- o Norwalk Human Relations Commission – April 18

**Will these changes or new information likely result in substantial public controversy?**

☐ Yes ☒ No

**Comments:** The design changes with the potential to result in public controversy focus on the Fort Point Street Bridge and roadway realignment and the additional use of parcels during construction, including the loss of the IMAX Theater. However, neither design change appeared to generate public controversy over the course of CTDOT’s extensive public outreach efforts.

The Fort Point Street Bridge relocation and roadway realignment introduces new impacts not previously identified; however, the design refinements will facilitate Walk Bridge project construction by reducing costs and impacts, and displaced property owners will be compensated. Further, the realignment of Fort Point Street will provide long-term transportation infrastructure and traffic improvements in East Norwalk. CTDOT incorporated City Engineering design requirements and requests into the bridge and roadway realignment, including modifying the roadway design to better accommodate trucks and improving pedestrian movements through South Smith/Fort Point Streets.

At the time of the EA/FONSI publication, CTDOT had not determined that its construction requirements at 10 North Water Street (Parcel 2/19/2) would be full-parcel use, resulting in displacement and demolition of the IMAX Theater. To mitigate for the loss of the IMAX Theater, CTDOT has entered into an agreement with the City of Norwalk allowing for the future development of a replacement facility. Both the City of Norwalk and the Maritime Aquarium of Norwalk have responded favorably to CTDOT’s agreement to provide funds for a new IMAX theater. Per CTDOT’s agreement with the City of Norwalk, the existing IMAX Theatre will be vacated to correspond with the occupancy of its functional replacement. CTDOT will continue to coordinate with the Maritime Aquarium and the City of Norwalk as the new 4D Theater is designed and constructed to sync project construction schedules. Additionally, CTDOT had not determined that full-parcel acquisition of 70 and 90 Water Street would be needed. CTDOT will provide monetary and other relocation assistance to displaced property owners as required. Following project completion, there are opportunities for the parcels to be redeveloped with water-

dependent uses, a priority use of waterfront parcels per the Norwalk Harbor Plan and the Connecticut Coastal Management Act.

Since the issuance of the FONSI in July 2017, CTDOT has conducted ongoing meetings with the City of Norwalk and community stakeholders to discuss project design refinement and receive input, as shown in the following table. The 60% design changes, including the proposed realignment of Fort Point Street bridge and roadway, were specifically addressed in public meetings held on June 5, 2018, November 28, 2018, December 8, 2018 and April 15, 2019. The removal of the IMAX Theater (and potential redevelopment of 10 North Water Street by the City) and proposed construction staging were discussed through public questions at the September 27, 2017 and June 5, 2018 public meetings, and more specifically addressed in the November 28, 2018 and December 8, 2018 meetings.

The Walk Bridge Program ([www.walkbridgect.com](http://www.walkbridgect.com)) received no written inquiries regarding the Fort Point Street bridge and roadway realignment. At stakeholder and public meetings, questions were asked about whether the landscaping business at 19 Fort Point Street would be acquired. There will be a small construction easement and a small permanent acquisition of this parcel required for the roadway realignment, however, the landscaping business will remain. Recent outreach meetings with EJ stakeholder groups and key stakeholders such as the Norwalk Transit District have been met with positive reactions regarding the Fort Point Street bridge and roadway realignment, with comments about how the realignment will improve safety in this area.

In 2016, the Program received two written inquiries opposing the removal of the IMAX Theater. The demolition of the IMAX was a common question at public meetings and community events in 2017 and 2018. Once Program staff explained that the Theater's replacement will be constructed on the Maritime Aquarium complex to the north, in coordination with the Maritime Aquarium, the public had no further comment. In 2019, no inquiries about the IMAX Theater removal have been received.

CTDOT has committed to working with the City and stakeholders throughout the project design and construction process. Presentations and meeting materials from public and stakeholder meetings are posted on the project website immediately following the meetings. CTDOT exhibits at local community-wide events annually to present updated project information and answer questions, including the Norwalk STEM Expo, Norwalk International Cultural Exchange Festival, the SoNo Arts Festival, and the Norwalk Oyster Festival. The project website provides updated information on design refinement details (such as the Fort Point Street bridge and roadway re-alignment), proposed staging activities, and community benefits (such as the IMAX Theater replacement). As part of the Business Coordination Plan, CTDOT is implementing door-to-door outreach to over 300 businesses with project brochures that include information of design elements such as the bridge design, Fort Point Street realignment and IMAX relocation. The door-to-door efforts were conducted in South and East Norwalk in April/May 2018 and Late April/Early May 2019.

On February 27, 2018, the Walk Bridge Project opened the Walk Bridge Welcome Center, a walk-in facility located in South Norwalk which allows the public to obtain current project information on an ongoing basis. Visual exhibits and marketing materials about the design updates are present in the Welcome Center. Kiosks with project factsheets and brochures are updated bi-weekly in key locations throughout Norwalk including City Hall, the Maritime Garage, SoNo Train Stations and the Maritime Aquarium/IMAX Theater.

Meeting	Date	Meeting Type
City Recreation, Parks, and Cultural Affairs Council	6/12/2019	City coordination
Norwalk Men's Group Meeting	4/16/2019	Requested stakeholder presentation

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<b>Meeting</b>	<b>Date</b>	<b>Meeting Type</b>
East Norwalk Neighborhood Association Meeting	4/15/2019	Requested public meeting
Norwalk Aquarium Coordination Meeting	4/3/2019	Stakeholder coordination
City Engineering Meeting	4/1/2019	City coordination
Norwalk Harbor Management Commission	3/27/2019	Permit coordination
Norwalk Shellfish Commission	3/7/2019	Permit coordination
Norwalk Harbor Management Commission	2/27/2019	Permit coordination
City Engineering Meeting	2/13/2019	City coordination
Norwalk Shellfish Commission	2/7/2019	Permit coordination
Shellfish Commission Meeting	1/3/2019	Permit coordination
Walk Bridge Welcome Center Open House	12/8/2018	Public open house
Shellfish Commission Meeting	12/6/2018	Permit coordination
Public Information Meeting	11/28/2018	Public meeting *
Norwalk Westport Regional TMP Progress Meeting	11/14/2018	Construction coordination
Norwalk Transit District Meeting	11/6/2018	Construction coordination
City Engineering Meeting	11/6/2018	City coordination
Shellfish Commission Meeting	11/1/2018	Permit coordination
Marine Police/Rower's Coordination Meeting	10/17/2018	Stakeholder coordination
City Engineering Meeting	10/16/2018	City coordination
Liberty Square Public	9/12/2018	Stakeholder coordination
City Engineering Meeting	7/12/2018	City coordination
City Engineering Meeting	6/12/2018	City coordination
Aquarium/IMAX Functional Replacement	6/6/2018	Stakeholder coordination
Shellfish Commission Meeting	6/7/2018	Permit coordination
Walk Bridge Construction Public Meeting	6/5/2018	Public meeting*
Maritime Aquarium Meeting	5/31/2018	Stakeholder coordination
Spinnaker Coordination Meeting	5/31/2018	Stakeholder coordination
Open House for City Council	5/31/2018	City coordination
Rower's Meeting	5/31/2018	Stakeholder coordination
Harbor Management Commission Meeting	5/23/2018	Permit coordination
Mayor Walk Bridge Update	5/10/2018	City coordination
Design Advisory Committee Meeting	5/10/2018	Stakeholder coordination
City Engineering Meeting	5/8/2018	City coordination
Construction Coordination Plan with City	4/24/2018	City coordination
City Engineering Meeting	4/3/2018	City coordination
Business Coordination Meeting	3/29/2018	Stakeholder coordination
City Engineering Meeting	3/14/2018	City coordination
Partnering Stakeholder Session	2/28/2018	Stakeholder coordination
Partnering Team Session	2/27/2018	Stakeholder coordination
Utilities Follow-up with City of Norwalk Meeting	2/20/2018	City coordination
City Engineering Meeting	2/8/2018	City coordination
Norwalk Tourism Meeting	2/6/2018	Requested stakeholder presentation
Spinnaker Meeting	1/31/2018	Stakeholder coordination
City Engineering Meeting	12/11/2017	City coordination
Design Advisory Committee Meeting	11/28/2017	Stakeholder coordination
Business Coordination Plan Update Meeting	11/28/2017	Stakeholder coordination
City Engineering Meeting	10/18/2017	City coordination

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Meeting	Date	Meeting Type
Design Advisory Committee Meeting	10/17/2017	Stakeholder coordination
Public Information Meeting	9/27/2017	Public meeting +
Aquarium Coordination Meeting	8/24/2017	Stakeholder coordination
Design Advisory Committee Meeting	8/15/2017	Stakeholder coordination
*Advertised in <i>La Voz</i> and <i>El Sol</i> publications		
+Advertised in <i>La Voz</i> , <i>El Sol</i> , and <i>The Haitian Voice</i> publications		
<p>CTDOT is participating in ongoing meetings with the Norwalk Harbor Management and Shellfish Commissions as part of pre-permit application coordination. Both Commissions have had the opportunity to provide valuable input and are up-to-date regarding construction in regulated areas; further, coordination with the Commissions will continue as the permit applications are reviewed by state and federal agencies and the conditions of the permit approvals are implemented.</p> <p>In fulfilment of Section 106 of the National Historic Preservation Act, a Memorandum of Agreement (MOA) has been executed among FTA, CTDOT, and CTSHPO. CTDOT has initiated all twelve stipulations of the project MOA, including implementing mitigation data recovery and curation at an NRHP-eligible archaeological site. In accordance with the Archaeological Treatment Plan of the MOA, and in consultation with CTSHPO and the Tribes, CTDOT has determined the limits of the archaeological site. CTDOT conducted mitigation data recovery through winter 2018 and is currently curating (processing, cleaning, cataloguing, and preserving) the excavated findings of the site. CTDOT is continuing to coordinate with FTA, CTSHPO, and the Tribes to implement the Archaeological Treatment Plan as stipulated in the MOA. Therefore, the conclusions reached in the original document remain valid.</p> <p>As stated in the EA/FONSI, CTDOT has committed to working with the City of Norwalk and the local community to develop multiple Construction Coordination Plans and other tools during final design and prior to the start of construction. These plans are living documents that are reviewed and updated as needed working in close coordination with the City of Norwalk, the business community, residents, and other affected parties. As part of its Business Coordination Plan, CTDOT is conducting a local business survey to inquire about relevant business operations that may be impacted by construction and provide businesses an opportunity to provide open ended feedback, concerns and/or suggestions to address construction impacts. Preliminary survey responses have identified the following concerns: (1) maintenance and protection of traffic, (2) building access, (3) parking, (4) river navigation, (5) transparency and (6) construction duration. Based on the results of the survey and in coordination with the City of Norwalk, CTDOT will develop mitigation measures to be implemented through construction. CTDOT will continue its community outreach through the duration of the project.</p>		

**COMMENTS:**

Federal and state permits and approvals required for the 60% design are consistent with those identified in the EA/FONSI (Attachment E), with one exception. The EA/FONSI identified an Inland Wetlands General Permit; subsequent field visits by CTDOT's Office of Environmental Planning (OEP) determined that no freshwater wetlands exist on the site, therefore a freshwater wetlands permit is not required.

Project mitigation proposed in the refined design is consistent with that presented in the EA/FONSI. The EA/FONSI identified ten candidate sites for tidal wetland restoration. Working with the Connecticut Department of Energy and Environmental Protection (CTDEEP) and USACE, CTDOT has advanced wetland mitigation design and refined the wetland mitigation sites (while still retaining the required

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mitigation ratios as identified in the EA/FONSI) and restoration program to consist of marsh restoration, Phragmites treatment, and restoration regrading. The selected mitigation sites will provide compensation at or exceeding required ratios.

**CONCLUSIONS AND RECOMMENDATIONS:**

After review of the proposed refinements in engineering design and construction methods and assessment of their potential impacts, CTDOT has concluded that these changes do not represent a significant impact to the environment. CTDOT is implementing the project mitigation measures, including ongoing coordination with federal and state agencies, in compliance with federal and state environmental regulations. CTDOT is implementing the stipulations of the project MOA in cooperation with local stakeholders and the Connecticut State Historic Preservation Office (CTSHPO). Further, CTDOT is continuing to develop construction coordination plans in cooperation with the City of Norwalk, to minimize construction impacts upon the local community. It is our recommendation that FTA determine that the project FONSI issued on July 17, 2017 remains valid.

**LIST OF ATTACHMENTS:**

- Attachment A Revised Project Limits
  - Figure 2-14a, Revised Project Limits – South Norwalk
  - Figure 2-14b, Revised Project Limits – East Norwalk
- Attachment B Plan of Fort Point Street Bridge Relocation and Roadway Realignment
- Attachment C CEPA Update for Sea Level Rise
- Attachment D Cultural Resources Supplemental Reports
- Attachment E Required Federal and State Permits and Approvals

**SUBMITTED BY:**

By signing this, I certify that to the best of my knowledge this document is complete and accurate.

Name	Date
Title	

**Table 1 – Assessment of Potential Impacts**

<b>Impact Category</b>	<b>Impacts as Disclosed in EA/FONSI</b>	<b>Impacts – 60% Design</b>	<b>Change in Impacts</b>
<b>Transportation - Marine Transportation</b>	EA/FONSI design provided a replacement bridge vertical clearance (in the closed position) of approximately 27 feet, increasing the existing vertical clearance by approximately 11 feet. The USCG determined that the EA/EIE adequately addressed bridge permit concerns regarding navigation.	Refined design provides a replacement bridge vertical clearance (in the closed position) of approximately 26 feet, increasing the existing vertical clearance by approximately 10 feet. The update reflects agency coordination, design refinement, and constructability analysis. The net change in clearance is less than one foot and is not significant.	CTDOT is updating the USCG on the bridge design on a continuous basis.  While the replacement bridge's vertical clearance in the closed position is less than that proposed in the EA/FONSI, the proposed clearance still represents a substantial improvement from existing conditions. In multiple pre-application coordination meetings, the USCG has indicated preliminary approval of the proposed vertical clearance, and that the Preliminary Navigation Determination will be provided upon receipt and review of 60% design plans. CTDOT is applying for a bridge permit from the USCG; the USCG will review and approve the vertical clearances (in the open and closed position) as part of the bridge permit approval.
	EA/FONSI design provided at least 200 feet of horizontal clearance in the navigation channel, substantially increasing the existing clearances provided by the west channel (58 feet) and the east channel (55 feet). USCG determined that the EA/EIE adequately addressed bridge permit concerns regarding navigation.	Refined design provides 170 feet of horizontal clearance in the navigation channel. The update reflects agency coordination, design refinement, and constructability analysis. While this increase is less than the horizontal clearance initially proposed, it represents a substantial navigational clearance increase from existing conditions and provides for improved vessel alignment with the Stroffolino Bridge.	While the replacement bridge's horizontal clearance is less than that proposed in the EA/FONSI, the proposed clearance still represents a substantial improvement from existing conditions. The proposed 170-foot horizontal clearance matches the existing federal navigational channel width at the bridge. The horizontal clearance will be reviewed by the USACE during its review of the Section 408 permit application.
<b>Transportation - Traffic, Transit and Parking</b>	EA/FONSI design of Fort Point Street Bridge replacement at existing location indicated no permanent impacts to traffic.	Refined design of Fort Point Street Bridge replacement realigns Fort Point Street with South Smith Street to the north and	The realignment provides both short-term and long-term traffic improvements. During construction, the realignment reduces

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
	Temporary impacts consisted of partial lane closures of Fort Point Street for about a month and occasional full street closures.	existing Fort Point Street northeast of the railroad. During construction, the realignment reduces potential construction-related traffic impacts. Rather than closing Fort Point Street Bridge for an extended period as the bridge is replaced (EA/FONSI design), in the refined design, the new bridge and Fort Point Street roadway can be constructed off-line while traffic is maintained on the existing Fort Point Street. Only very limited temporary closures are required when the traffic is shifted from the existing alignment to the new alignment. The realignment improves the functionality and safety of the intersection of Fort Point Street and South Smith Street.	construction-related traffic impacts. While Fort Point Street replacement requires temporary closures during periods when traffic is shifted from the existing Fort Point Street alignment to the proposed Fort Point Street alignment, for most of the construction duration, existing Fort Point Street remains open to traffic.  In the long-term, the Fort Point Street realignment improves the functionality and safety of the intersection of Fort Point Street and South Street and addresses a traffic improvement priority of the City of Norwalk.
<b>Land Use and Economics – Land Use and Zoning</b>	EA/FONSI design indicated no permanent impact to the land use pattern or zoning due to limited parcel-specific land use changes resulting from parcel acquisitions. Following project completion, CTDOT's Office of Rights of Way Property Management Division will be responsible for managing the properties acquired for the project, including the sale or lease of the properties. Regarding the sale of the waterfront property, upon construction completion, CTDOT will market the excess property indicating the highest priority and preference for water-dependent use of the site.	Refined design and construction methods result in three parcel-specific land use changes. The Fort Point Street Bridge relocation and roadway realignment results in a land use change at 21 Fort Point Street from mixed use to transportation. Acquisition of 70 and 90 Water Street results in a temporary land use change from commercial to transportation-support.  Displacement of the IMAX Theater does not change the existing land use designation of Institutional/ Government of the Maritime Aquarium Complex (10 North Water Street, Parcels 2/19/2 and 2/19/3).	Refined design results in three additional parcel-specific land use changes; however, these limited land use changes do not alter the land use pattern or zoning in the City of Norwalk. Following project completion, acquired parcels will be sold. The sale of the waterfront property (90 Water Street) will be consistent with the procedures described in the EA/FONSI: CTDOT will indicate the highest priority and preference for a future water-dependent use of the site.
<b>Land Use and Economics - Socioeconomics</b>	EA/FONSI design indicated loss of property tax revenue of approximately \$82,000 per year over the 4-year construction period due	Refined design of Fort Point Street Bridge requires acquisition of 21 Fort Point Street; refined construction methods requires	With the acquisitions of three additional parcels, the total loss of property tax revenue is approximately \$118,000 per year



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Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
	to (full) parcel acquisitions. The combined assessed value of these displaced properties comprised less than 0.03% of the City's net taxable Grand List for real property (total aggregate valuation of taxable real property in Norwalk), and the annual tax revenue from these affected properties comprised approximately 0.03% of the City's total annual tax revenues in 2015-2016.	acquisition of 70 and 90 Water Street. The three additional parcel acquisitions represent a loss of property tax revenue of approximately \$36,000 per year over the 4-year construction period.	over the 4-year construction period. The combined assessed value of these displaced properties comprised approximately 0.04 % of the City's net taxable Grand List for real property, and the annual tax revenue from these affected properties also comprised approximately 0.04% of the City's total annual tax revenues in 2015-2016. The 0.01% change represents a negligible impact upon total City revenues. Following construction completion, CTDOT will sell the properties, returning them to the City's Grand List.
	EA/FONSI design and construction methods resulted in adverse impacts to some facilities and operations of the Maritime Aquarium (Imax Theater, Parcel 2/19/2) due to temporary construction and permanent easements. The extent of impacts was identified as To be Determined (TBD); CTDOT would work in coordination with the City and the Maritime Aquarium to determine parcel uses.	<p>Refined construction methods require full use of Parcel 2/19/2 to facilitate construction, displacing the Imax Theater. Refined design of the MNR power and communication signals and future bridge maintenance have expanded permanent easement requirements.</p> <p>CTDOT is coordinating the closure and displacement of the IMAX Theater with the construction and occupancy of its functional replacement, a new 4D Theater. The new 4D Theatre is scheduled to be constructed and ready for occupancy by mid-December 2020; per CTDOT's agreement with the City, the existing IMAX Theatre will be vacated by December 31, 2020. CTDOT will continue to work with the City to coordinate the schedules of the new facility construction and existing facility vacancy and demolition to minimize economic impacts to the City and Maritime Aquarium.</p>	<p>To mitigate for the loss of the IMAX Theater, CTDOT has entered into an agreement with the City of Norwalk allowing for the future development of a replacement facility. The occupancy of replacement facility will be phased with the vacancy of the existing facility to avoid adverse economic impacts.</p> <p>The expanded permanent easement requirement at 10 North Water Street may impact the future development and revenue-generation of the parcel, as less of the 0.85-acre parcel may be available for future development.</p>

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
<b>Acquisitions, Displacements &amp; Relocations</b>	<p>EA/FONSI design and construction methods required the use of 22 parcels for constructing and maintaining the replacement bridge. Uses included: 2 existing CTDOT-owned parcels, expansion of 1 existing CTDOT-easement, 8 full-parcel acquisitions; 11 full-parcel and partial-parcel temporary easements for replacement bridge construction; and 3 permanent easements for access to and maintenance of the replacement bridge. Proposed use of Parcels 2/19/2 and 2/19/3 (10 North Water Street) was TBD. Further, the EA/FONSI stated that as design progresses, property impacts, including parcel acquisitions and temporary and permanent easements, will continue to be refined.</p> <p>CTDOT will provide monetary and other relocation assistance to displaced property owners in accordance with the procedures outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Connecticut's Uniform Relocation Assistance Act.</p> <p>Upon project completion, acquired parcels will be sold per CTDOT's Office of Rights of Way Property Management Division. For waterfront parcels, CTDOT will select the highest bid that best demonstrates an integrated, quality, water-dependent use, in coordination with CTDEEP.</p>	<p><u>Refined design</u> (Fort Point Street Bridge realignment) requires the following new acquisitions:  <b><i>New Parcel Acquisition</i></b> - 21 Fort Point Street (Parcel 3/1/11), displacing an existing restaurant and up to three residences in two buildings.  <b><i>New Temporary Easements:</i></b> 19 Fort Point Street (Parcel 3/1/27) and 15 Fort Point Street (Parcel 3/1/21).  <b><i>New Permanent Easements:</i></b> 19 Fort Point Street (Parcel 3/1/27), 15 Fort Point Street (Parcel 3/1/21), and 2 South Smith Street (Parcel 3/3/1).</p> <p><u>Refined construction methods</u> have resulted in changes to three parcels of the 22 parcels identified in the EA/FONSI, as follows:</p> <p><b><i>70 Water Street (Parcel 2/84/63) and 90 Water Street (Parcel 2/84/33).</i></b> These parcels were identified in the EA/FONSI as full-parcel temporary easements. Due to the development of the Marine Staging Yard and anticipated construction duration, CTDOT anticipates that these full-parcel temporary easements will be revised to full-parcel acquisitions.</p> <p><b><i>10 North Water Street - Parcel 2/19/2.</i></b> The temporary easement for this parcel was identified in the EA/FONSI as Partial/To be Determined (TBD), and the parcel's permanent easement was identified as TBD for bridge operation and</p>	<p>Upon project completion, acquired parcels will be sold. For the waterfront property (90 Water Street), CTDOT will use the same approach as described in the EA/FONSI: CTDOT will select the highest bid that best demonstrates an integrated, quality, water-dependent use, in coordination with CTDEEP.</p> <p>Eligible displaced owner-occupants and tenants are entitled to receive relocation benefits as outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. At this time, specific relocation benefits have not been determined. Should CTDOT proceed with the new parcel acquisition, the Division of ROW will conduct relocation surveys with all displaced individuals to fully assess their potential relocation benefits.</p> <p>Following project completion, temporary easements will cease, and properties will be restored to pre-construction conditions.</p>

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
		<p>maintenance. To accommodate construction equipment and staging needs, CTDOT determined that it requires full use of this parcel as a temporary easement. CTDOT anticipates that an expanded permanent easement is needed to accommodate a duct bank for MNR power and communication signals, in addition to the previously-identified bridge operation and maintenance.</p> <p>In addition to the 22 parcels identified in the EA/FONSI, five temporary easements previously secured for advance projects are retained for the Walk Bridge Project, as follows:</p> <p><b>21, 23, 29, 41 North Main Street</b> (Parcels 2/24/3, 2/24/4, 2/24/5, and 2/24/8). The temporary easements on the North Main Street parcels, previously acquired for the Danbury Dock Yard Improvements Project, are required for Eversource transmission pole removal.</p> <p><b>10 Norden Place</b> (Parcel 3/17/40). The parking area at 10 Norden Place, previously acquired for the CP-243 Interlocking Project, is required for construction staging and track access.</p> <p>As the project advances, minor additional ROW may be needed.</p>	

Connecticut Department of Transportation  
Walk Bridge Replacement Project

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
<b>Neighborhoods &amp; Populations (Social) - Title VI and Environmental Justice</b>	EA/FONSI design indicated no disproportionate temporary or permanent impacts to Environmental Justice (EJ) populations. While the three residential property displacements (including up to six residences) and four businesses affected by the project are located within a Census Tract identified as an EJ Community of Concern, the entire study area (three Census Tracts) are EJ Communities of Concern, and the permanent property displacements are in the least urbanized and least developed portions of the project site. Affected uses/landowners will be provided with relocation assistance.	The Walk Bridge Project, replacing Walk Bridge and Fort Point Street Bridge, is on an existing rail corridor and is located entirely within EJ Communities of Concern. Refined design of the Fort Point Bridge replacement results in up to four additional displacements, consisting of a restaurant, and up to three residences. Like those identified in the EA/FONSI, the additional affected business and residences are located within a Census Tract identified as an EJ Community of Concern. The Fort Point Street Bridge and roadway realignment will directly benefit the East Norwalk community, an EJ Community of Concern, by easing Walk Bridge Project construction impacts and by improving the functionality of the Fort Point Street/South Street interchange. The project will improve accessibility and reliability of the bridges and the navigational opening of the Norwalk River, providing an overall benefit to the entire community. The affected uses/landowners will be provided with relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970. For these reasons, the project does not disproportionately affect EJ populations.	Refined design indicates no disproportionate temporary or permanent impacts to EJ populations. The project is important to the continued economic prosperity of the community and the region and will benefit EJ communities, which comprise the study area as well as a substantial portion of the local community.

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
<b>Visual Resources &amp; Aesthetics</b>	EA/FONSI design indicated permanent altered visual setting due to loss of historic resources, and potential altered visual effect due to location of new bridge in an historic setting. The EA/FONSI indicated that the design has been developed to minimize aesthetic impacts to the extent possible. The design of the bridge, abutments, and other elements will be performed in coordination with the CTSHPO, the City of Norwalk's Design Review Committee, and other stakeholders. Measures such as treatments of retaining walls and abutments and landscaping will be considered to improve the appearance of the new bridge and project site.	Refined design requires displacement of the IMAX Theatre (10 North Water Street, Parcel 2/19/2) and grading of the site, resulting in an altered visual setting.	Displacement of the IMAX Theater results in an altered visual setting; however, the altered setting does not result in an adverse visual effect.
<b>Water Resources – Water Quality</b>	<p>EA/FONSI design indicated temporary impacts due to dredging and other waterway work; however, CTDOT will employ Best Management Practices (BMPs) while conducting all work within the water to minimize releases of sediment to the water. Measures could include cofferdams, sheet pile marine enclosures, or oversized pipe enclosures, or other containment measures such as turbidity curtains, sheeting, and geotextile encapsulation, per CTDEEP and USACE requirements. Attachment H provides required federal and state permits and approvals.</p> <p>EA/FONSI design indicated that drainage swales may be used in locations where drainage requires conveyance, and where applicable, the closed deck approach span sections of the bridge will include drainage</p>	<p>Refined design requires additional dredging to accommodate new docking facilities for the Maritime Aquarium and Sheffield Island ferry vessels, and to install a new sheet pile bulkhead at 68 and 90 Water Street. As indicated in the EA/FONSI, dredging will occur with BMPs per federal and state permit requirements. The additional dredging will not require additional permits.</p> <p>Refined drainage for the approach spans consists of closed systems, consistent with the EA/FONSI design. Stormwater discharged into the Norwalk River will be pre-treated per the Connecticut Stormwater Quality Manual to the extent practicable prior to discharge.</p>	<p>Using BMPs included in federal and state permit applications, CTDOT will demonstrate that dredging, including additional dredging due to refined design, will not adversely impact water quality. No additional permits are required due to the design modification.</p> <p>Refined stormwater design is consistent with the EA/FONSI design. Stormwater discharging to the Norwalk River will be pre-treated to the maximum extent practicable in accordance with the Connecticut Stormwater Quality Manual.</p>

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
	methods to direct water away from the river.		
<b>Water Quality – Aquatic Resources, Species and Critical Habitats</b>	<p>EA/FONSI design indicated a permanent loss of intertidal flat and subtidal habitat due to various new bridge footprint components and associated activity. The removal of the existing west rest-pier, existing east rest-pier, and the existing center-pivot pier resulted in the reclamation of estuarine subtidal unconsolidated channel bottom habitat.</p> <p>EA/FONSI design indicated impacts to subtidal habitat and intertidal habitat due to dredging, including conversion of intertidal habitat to subtidal habitat, and increase in depth of subtidal areas within the dredging footprint. CTDOT to provide compensatory mitigation for habitat displacement in coordination with USACE and CTDEEP.</p>	<p>Refined design requires additional foundational elements for Piers 2 and 3, resulting in increased impact to subtidal habitat. As a result, the reclamation of estuarine subtidal unconsolidated channel bottom habitat is smaller than initially disclosed. Refined design requiring additional dredging increases permanent loss of subtidal habitat and intertidal habitat and increases depth of subtidal areas within the expanded dredging footprint.</p> <p>An alternatives analysis was conducted to refine design for the MNR communication utilities cable crossing of the Norwalk River. The analysis evaluated installing the cables within two separate 42-inch diameter pipes by horizontal directional drilling (HDD) or cut and cover (CAC)</p>	<p>CTDOT will provide compensatory mitigation for habitat displacement due to the construction phase impacts to intertidal and subtidal habitats in coordination with the NMFS, USACE and CTDEEP. Attachment E identifies required federal and state approvals. No additional permits or approvals are required due to the design modifications. Coordination with federal and state agencies is ongoing.</p>

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Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
		design. HDD would use guided drill rigs to install piping underground, and CAC would place pipes at the desired elevation by excavating and removing material to create a trench, placing the pipes, and then backfilling the trench. CTDOT determined that the CAC option has lower cost and lower risk than the HDD option. While the HDD option would not disturb the river bottom or water quality of the Norwalk River habitat, the HDD could result in frac-out due to drilling complications, presenting a serious environmental concern. The temporary environmental impacts of the CAC option primarily occur in proposed dredging areas, with an additional minimal footprint of disturbance restricted to the intertidal zone (with no additional impact to mudflats or vegetated tidal wetland). Further, the impacts of the CAC option can be mitigated based on the final staging and installation method. No additional permits are required.	
<b>Hazardous Materials</b>	EA/FONSI design indicated dredging required disposal of approximately 15,100 cubic yards of dredged sediment. CTDOT will manage dredged sediments on-site, dispose of materials off-site at an approved location, and obtain approvals as required. Attachment H provides required federal and state permits and approvals.	Refined design requires disposal of additional dredged sediment. No additional permits or approvals are required due to increased dredging amount.	CTDOT will manage dredged sediments on-site, dispose of materials off-site at an approved location, and obtain approvals as required.
<b>Historic, Cultural &amp; Archaeological Resources</b>	EA/FONSI design indicated adverse effects due to the demolition of National Register-listed Walk Bridge and Fort Point Street Bridge; and historic stone abutment retaining walls, high towers, and catenary	Refined design requiring realignment of Fort Point Street does not impact above-ground historic resources or intact archaeological resources, nor does it impact the project MOA. The	Impacts of the refined design and construction methods relative to <b>Historic, Cultural &amp; Archaeological Resources</b> are consistent with the EA/FONSI and the project MOA.

Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
	support structures. No adverse effects to historic buildings and settings due to temporary construction staging/access areas or permanent access areas, provided no physical damage occurs to the historic buildings. The project MOA provides mitigation to address project impacts, including an Archaeological Treatment Plan.	realignment of Fort Point Street at the revised location has substantially the same adverse effect as the previous design. Mitigation stipulated in the project MOA, consisting of documentation of the historic structures on the New Haven Line, including Fort Point Street Bridge, was completed in August 2018.	In fulfillment of Section 106 of the National Historic Preservation Act, a Memorandum of Agreement (MOA) has been executed among FTA, CTDOT, and CTSHPO. CTDOT has initiated all twelve stipulations of the project MOA, including implementing mitigation data recovery and curation at an NRHP-eligible archaeological site. In accordance with the Archaeological Treatment Plan of the MOA, and in consultation with CTSHPO and the Tribes, CTDOT has determined the limits of the archaeological site. CTDOT conducted mitigation data recovery through winter 2018 and is currently curating (processing, cleaning, cataloguing, and preserving) the excavated findings of the site. CTDOT is continuing to coordinate with FTA, CTSHPO, and the Tribes to implement the Archaeological Treatment Plan as stipulated in the MOA. Therefore, the conclusions reached in the original document remain valid.
<b>Construction</b>	Construction methods as initially disclosed required parcel acquisitions and temporary easements, as described in <b>Acquisitions, Displacements &amp; Relocations.</b>	Refined construction method requires a different configuration of parcel use (acquisitions and easements) than initially disclosed, as described in <b>Acquisitions, Displacements &amp; Relocations.</b>	Change in impacts due to refined construction methods is described in <b>Acquisitions, Displacements &amp; Relocations.</b>
<b>Secondary and Cumulative Impacts</b>	EA/FONSI design indicated that the project will provide regional secondary economic benefits on a temporary basis due to increased construction spending. The project will provide cumulative benefits on a permanent basis through improved NHL performance and reliability, improved	As indicated in the EA/FONSI, Eversource is responsible for relocating its utility lines and is applying for federal and state permits for the relocation of its electrical power lines. independent of the Walk Bridge Replacement Project.	Secondary and cumulative impacts proposed in the refined design are consistent with those identified in the EA/FONSI design.  The Maritime Aquarium conducted environmental reviews for the proposed 4D



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Impact Category	Impacts as Disclosed in EA/FONSI	Impacts – 60% Design	Change in Impacts
	marine conditions in Norwalk Harbor, and an expanded NRVN network in Norwalk. Further, secondary impacts will occur due to relocation of the Eversource power, currently on high towers abutting the existing bridge; and cumulative impacts will occur due to loss of a tangible example of historic movable bridge technology in Connecticut, and a bridge on the NRHP-listed Movable Railroad Bridges on the Northeast Corridor in Connecticut Thematic Resource.	<p>The refined design is consistent with the secondary and cumulative impacts and benefits identified in EA/FONSI design. Additional secondary impacts will occur associated with the redevelopment of waterfront parcels, due to the demolition and displacement of the IMAX Theater at 10 North Water Street (Parcel 2/19/2) and the temporary acquisition and resale of the waterfront parcel at 90 Water Street (Parcel 2/84/33). Following project completion, there are opportunities for the parcels to be redeveloped with water-dependent uses, a priority use of waterfront parcels per the Norwalk Harbor Plan and the Connecticut Coastal Management Act. Water-dependent uses include, but are not limited to; marinas, recreational and commercial fishing and boating facilities, finfish and shellfish processing plants, waterfront dock and port facilities, shipyard and boat building facilities, and water-based recreational uses.</p> <p>An additional secondary impact will occur due to the construction of a new 4D Theater within the existing Maritime Aquarium complex, 10 North Water Street, Parcel 2/19/3. In coordination with the City of Norwalk, the Maritime Aquarium of Norwalk is responsible for constructing the functional replacement facility, including conducting associated environmental evaluations and obtaining permits.</p>	Theatre and associated renovations to the existing facility at 10 North Water Street (Parcel 2/19/3) to comply with the requirements of the City Department of Planning and Zoning. Reviews included architectural and historic, parking, traffic, stormwater drainage, floodplain, endangered species, and coastal site planning. The proposed 4D Theater will consist of an addition to the current main entrance to the facility (constructed in the 1980s) and will not result in adverse impacts to existing structures. The 4D Theater will be constructed of brick to complement existing building façades. The Maritime Aquarium obtained required approvals from the City of Norwalk for the functional replacement project.

**FEDERAL TRANSIT ADMINISTRATION**  
**ENVIRONMENTAL RE-EVALUATION CONSULTATION**

**ATTACHMENTS**

**Attachment A      Revised Project Limits**

Figure 2-13a	Elevation View of the Long-Span Vertical Lift Bridge, Refined Design
Figure 2-14a	Illustration of the Project Limits, South Norwalk, Refined Design
Figure 2-14b	Illustration of the Project Limits, East Norwalk, Refined Design

**Attachment B      Plan of Fort Point Street Bridge Relocation and Roadway  
Realignment**

**Attachment C      CEPA Update for Sea Level Rise**

**Attachment D      Cultural Resources Supplemental Reports**

- Supplementary Historic Resources Evaluation Report: Relocation of the Fort Point Street Railroad Bridge
- Supplementary Technical Memorandum, Archaeological Sensitivity Assessment, Relocation of the Fort Point Street Railroad Bridge

**Attachment E      Required Federal and State Permits and Approvals**

**Attachment A**                      **Revised Project Limits**

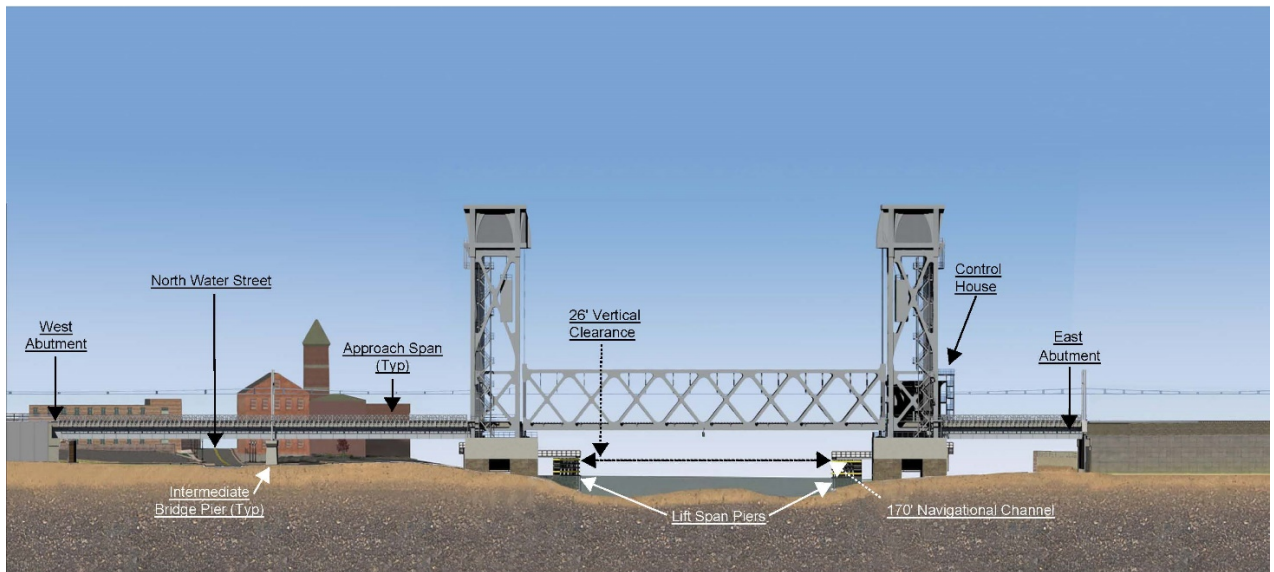


Figure 2-13a Elevation View of the Long Span Vertical Lift Bridge, Refined Design

Connecticut Department of Transportation  
Walk Bridge Replacement Project

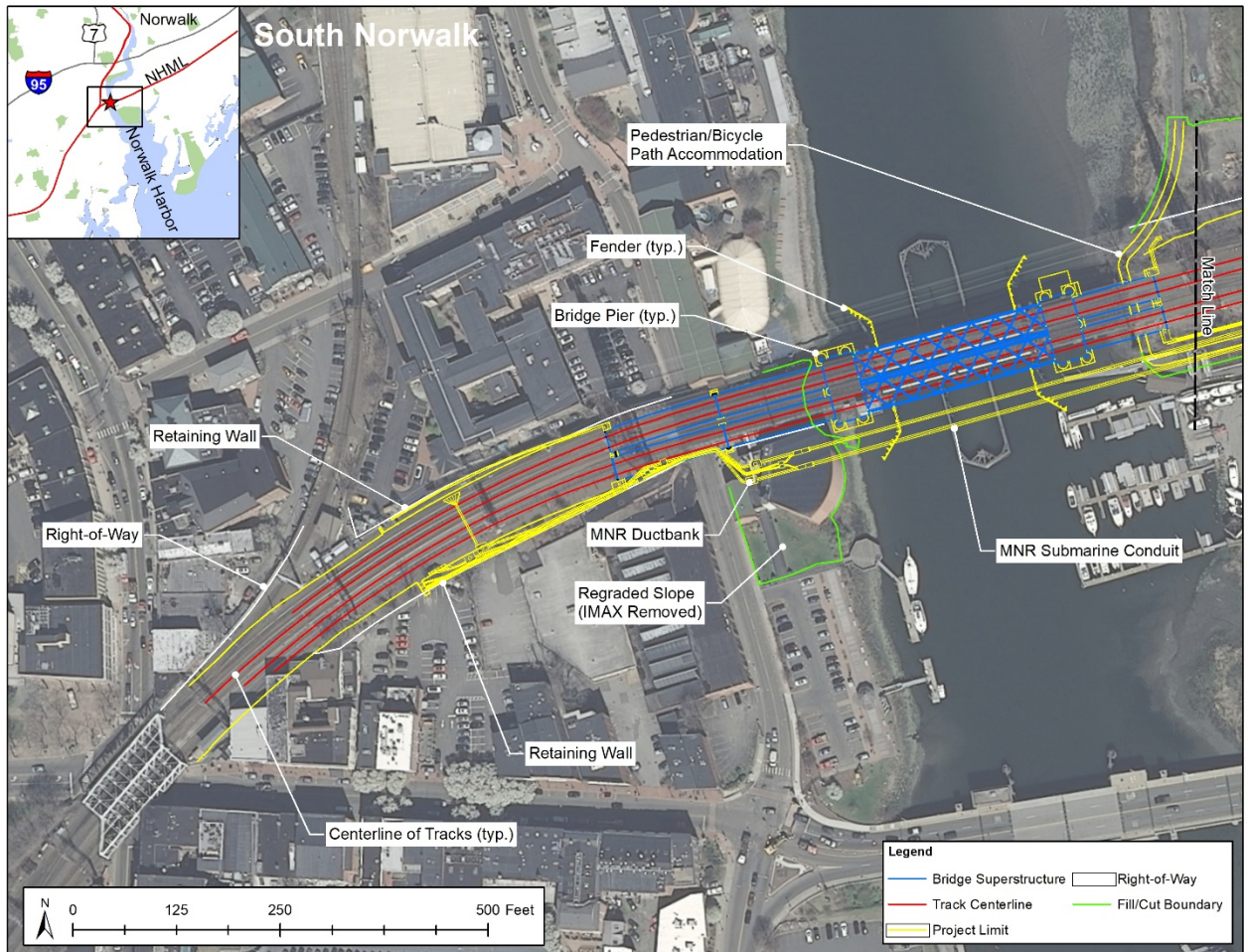
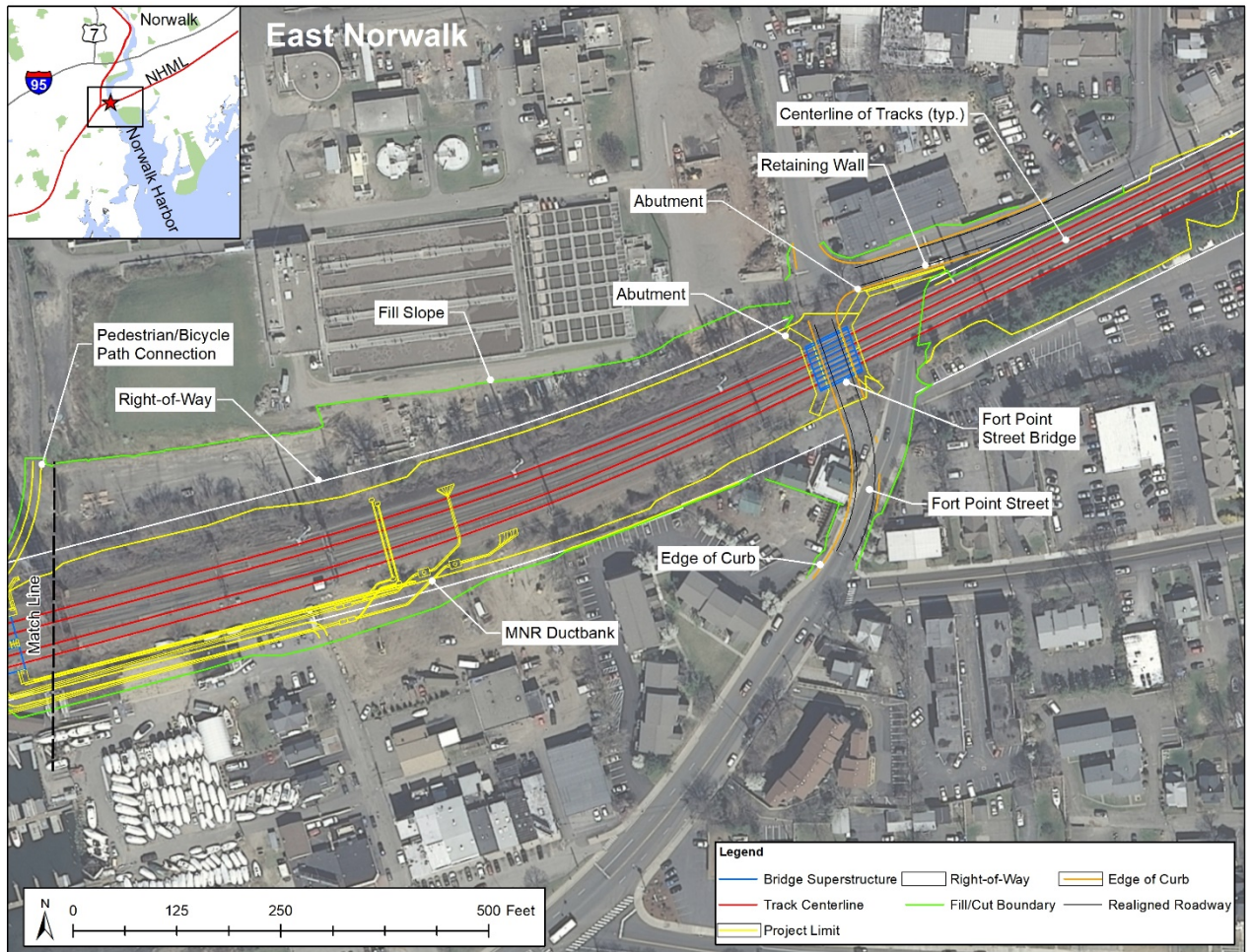


Figure 2-14a Illustration of the Project Limits, South Norwalk, Refined Design



**Connecticut Department of Transportation  
Walk Bridge Replacement Project**



**Figure 2-14b Illustration of the Project Limits, East Norwalk, Refined Design**

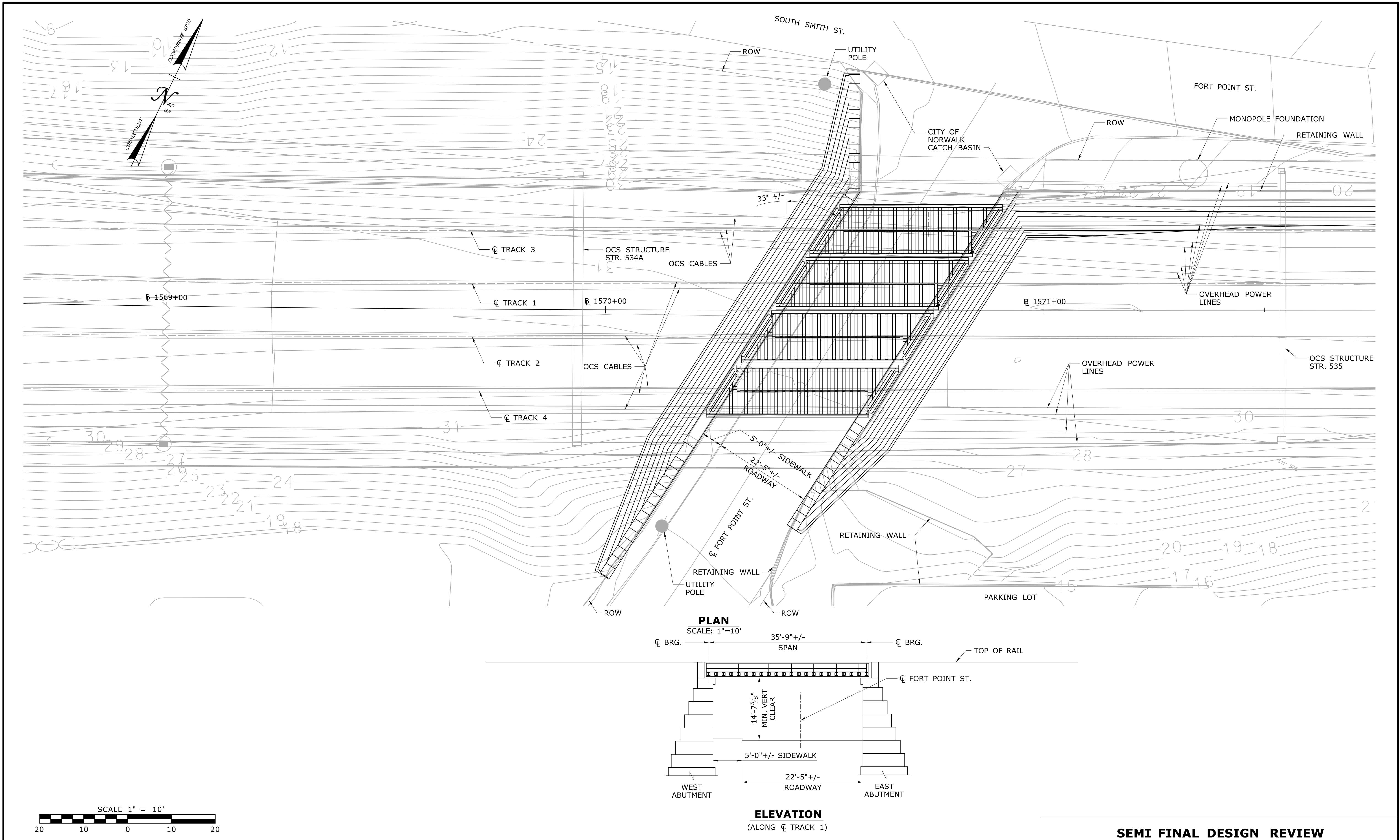
**Attachment B**

**Plan of Fort Point Street Bridge Relocation and  
Roadway Realignment**










SEMI FINAL DESIGN REVIEW

REV.	DATE	REVISION DESCRIPTION	SHEET NO.	Plotted Date: 6/13/2018

DESIGNER/DRAFTER:  
T. ADINOLFI  
CHECKED BY:  
N. WILD  
SCALE AS NOTED

 **STATE OF CONNECTICUT**  
**DEPARTMENT OF TRANSPORTATION**

Filename: ...\\STR-003\_SB\_Sheet Model.0301-0189.dgn

SIGNATURE/  
BLOCK:

**HNTB** HNTB Corporation  
Engineers Architects Planners  
55 Capital Boulevard, 4th Floor  
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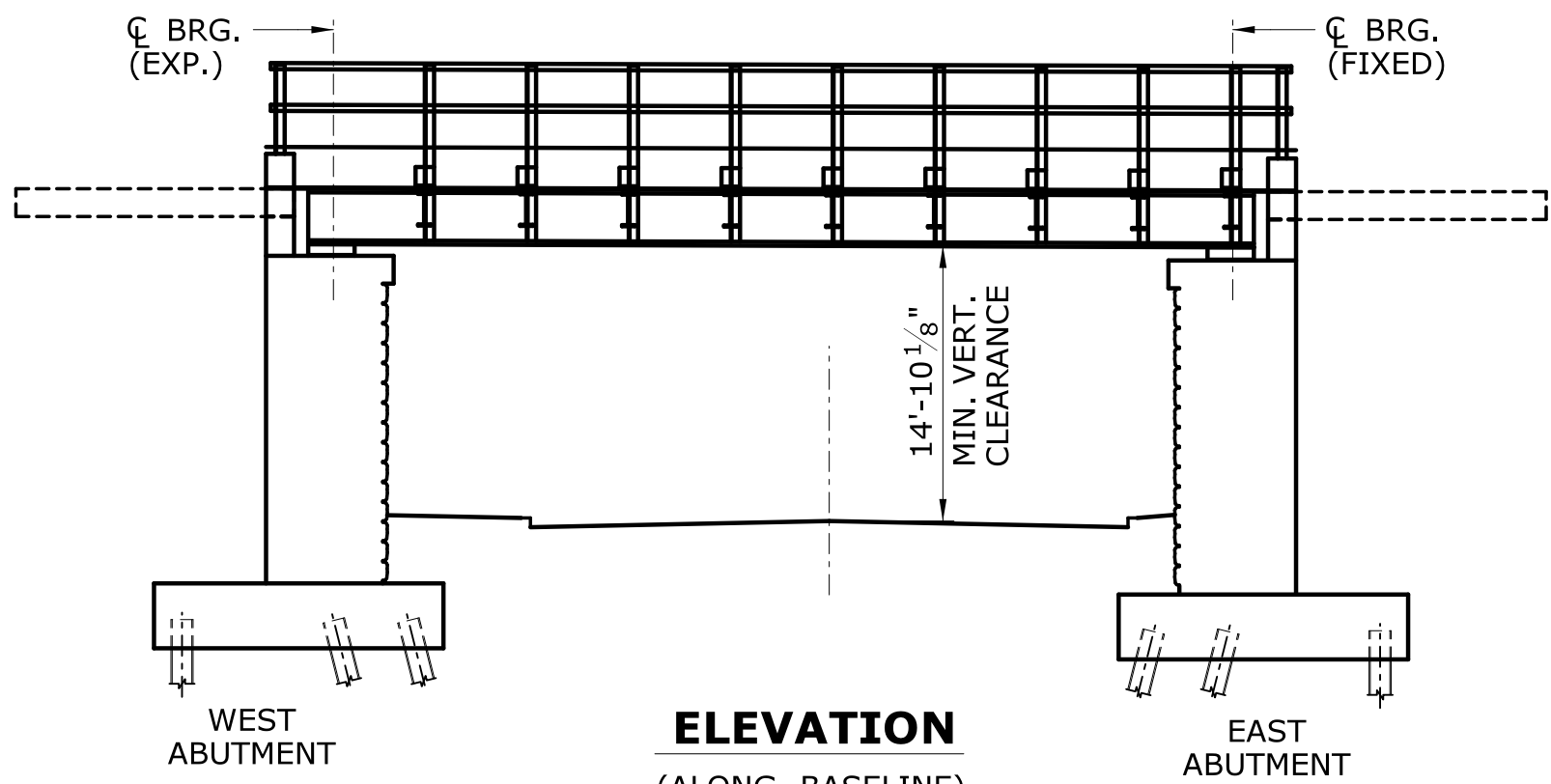
PROJECT TITLE:

**BRIDGE NO. 04131R REPLACEMENT  
METRO-NORTH RAILROAD MP 41.79  
OVER FORT POINT STREET**

TOWN:	<b>NORWALK</b>	PROJECT NO.	<b>0301-0189</b>
DRAWING TITLE:	<b>EXISTING PLAN AND ELEVATION</b>	DRAWING NO.	<b>STR-003</b>
		SHEET NO.	<b>03.04.003</b>

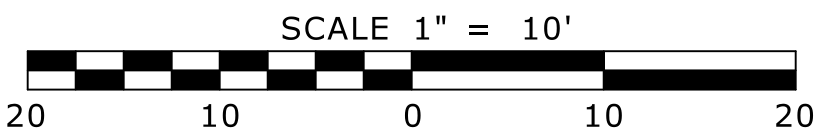


**PLAN**  
SCALE: 1"=10'



**ELEVATION**  
(ALONG BASELINE)

- NOTES:**
- FOR PROPOSED FT. POINT ST. ROADWAY DETAILS, SEE SUBSET 03.02




**SEMI FINAL DESIGN REVIEW**

REV.	DATE	REVISION DESCRIPTION	SHEET NO.

THE INFORMATION, INCLUDING ESTIMATED QUANTITIES OF WORK, SHOWN ON THESE SHEETS IS BASED ON LIMITED INVESTIGATIONS BY THE STATE AND IS IN NO WAY WARRANTED TO INDICATE THE CONDITIONS OF ACTUAL QUANTITIES OF WORK WHICH WILL BE REQUIRED.

Plotted Date: 6/13/2018

DESIGNER/DRAFTER:  
**T. ADINOLFI**  
CHECKED BY:  
**N. WILD**  
SCALE AS NOTED

**STATE OF CONNECTICUT**  
**DEPARTMENT OF TRANSPORTATION**

Filename: ...\\STR-004\_SB\_Sheet Model\_0301-0189.dgn

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PROJECT TITLE:  
**BRIDGE NO. 04131R REPLACEMENT  
METRO-NORTH RAILROAD MP 41.79  
OVER FORT POINT STREET**

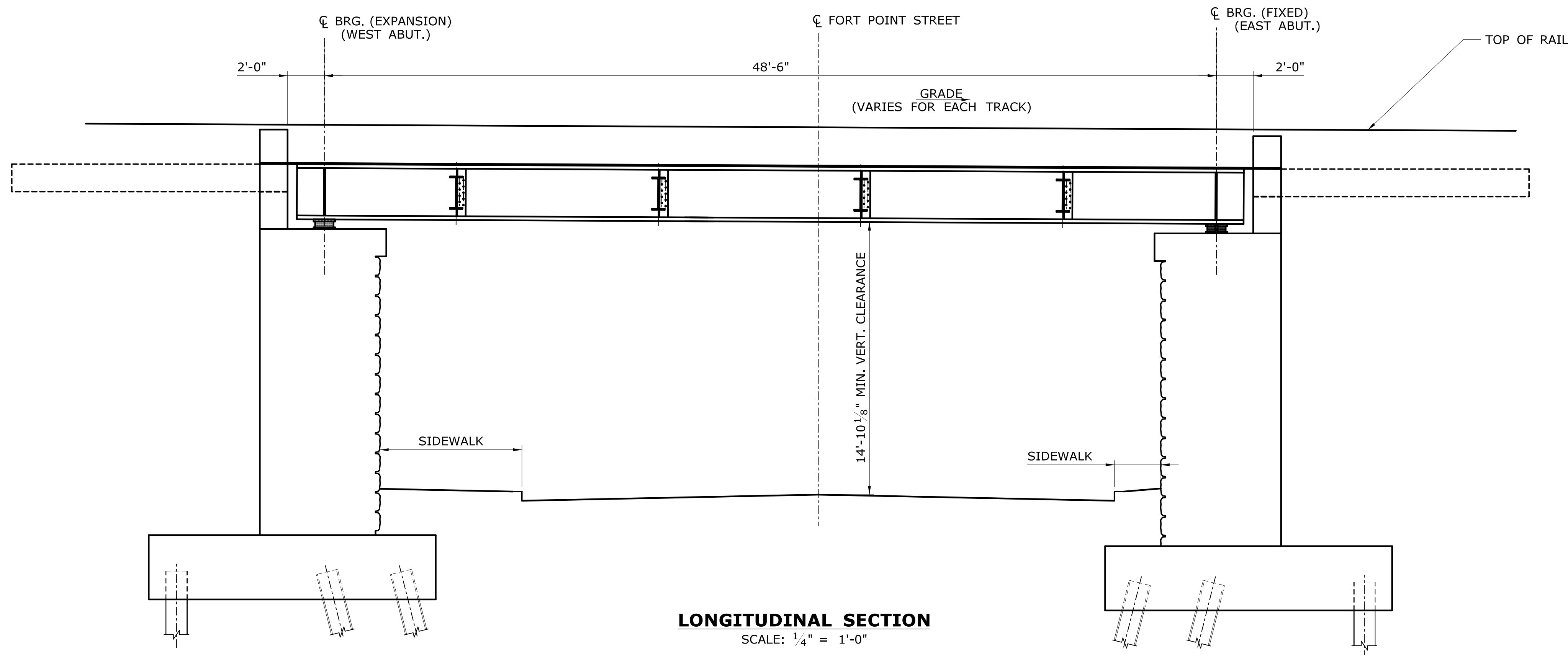
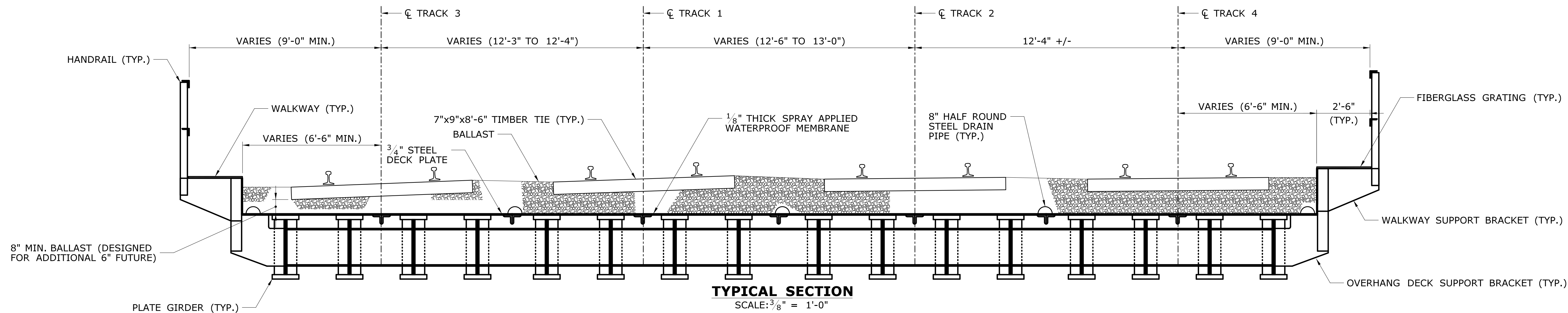
TOWN:  
**NORWALK**

DRAWING TITLE:  
**GENERAL PLAN  
AND ELEVATION**

PROJECT NO.  
**0301-0189**

DRAWING NO.  
**STR-004**

SHEET NO.  
**03.04.004**



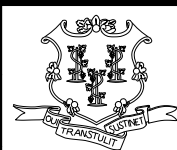
SEMI FINAL DESIGN REVIEW

REV.	DATE	REVISION DESCRIPTION	SHEET NO.

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Plotted Date: 6/18/2018

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SCALE AS NOTED



STATE OF CONNECTICUT  
DEPARTMENT OF TRANSPORTATION

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PROJECT TITLE:

**BRIDGE NO. 04131R REPLACEMENT  
METRO-NORTH RAILROAD MP 41.79  
OVER FORT POINT STREET**

TOWN:

**NORWALK**

DRAWING TITLE:

**TYPICAL  
BRIDGE SECTIONS**

PROJECT NO.

**0301-0189**

DRAWING NO.

**STR-005**

SHEET NO.

**03.04.005**

**Attachment C**

**CEPA Update for Sea Level Rise**

## CEPA Update for Sea Level Rise

Connecticut Public Act No. 18-82, *An Act Concerning Climate Change Planning and Resiliency*, was approved by the Governor on June 6, 2018. The Act mandates the consideration of sea level change scenarios upon infrastructure planning and development. It requires the publication of a sea level change scenario for the State of Connecticut based upon the NOAA's analysis. On March 27, 2018, the Connecticut Institute for Reliance and Climate Adaptation (CIRCA) released a draft report, *Sea Level Rise in Connecticut*. The report modified the results of federal scenarios for sea level rise to include the effects of local conditions and indicates that the planning threshold for sea level rise for the Connecticut coast is 0.5 meters (approximately 2 feet), the center of the range of predictions at 2050.

Table 1 presents the elevations of key bridge elements on existing Walk Bridge and their ability to withstand inundation levels of the four categories of hurricanes, based upon the peak water surface elevations of different events, and incorporating a projected 2-foot sea level rise. The bridge's mechanical equipment for the center (pivot) pier is housed within the engine (machine) room. Additional mechanical equipment for the swing span is located below the engine (machine) room, very close to the top of pivot pier.

**Table 1 — Existing Walk Bridge Structural Elevations and Hurricane Resistance, with a 2-foot Sea Level Rise**

Bridge Element	Approx. Elevation <sup>a</sup>	Resistance to Hurricane Inundation Levels <sup>a, b</sup>			
		Category 1 El. 11.2	Category 2 El. 16.1	Category 3 El. 21.0	Category 4 El. 26.4
Main Span Low Chord	19.8	yes	yes	no	no
Approach Span Low Chord	18.0	yes	yes	no	no
Control House Lowest Floor	36.0	yes	yes	yes	yes
Engine (Machine) Room Floor	19.7	yes	yes	no	no
Top of Pivot Pier	9.0	no	no	no	no

Notes:

a. Elevations shown in (NAVD88).

b. Elevation shown for peak water surface elevation (NAVD88) with incorporation of 2-foot sea level rise.

As shown in Table 1, the top of pivot pier and the mechanical equipment in its vicinity are impacted by inundation levels of all categories of hurricanes. Except for those mechanical elements located at the top of the pivot pier, the critical bridge elements can withstand inundation levels of Category 1 and Category 2 hurricanes in a 2-foot sea level rise scenario. Except for the Control House, the mechanical elements of the existing bridge would be impacted by inundations levels of Category 3 and Category 4 hurricanes in a 2-foot sea level rise scenario. While the planning and design guidelines of Public Act No. 18-82 do not apply to existing infrastructure, Table 1 shows the adverse impacts of sea level rise upon existing Walk Bridge.

Public Act No. 18-82 requires that State projects in coastal zones incorporate “flood-proofing,” defined as incorporating an additional two feet of freeboard above base flood and any additional freeboard necessary to account for the most recent sea level change scenario. Freeboard is defined as a safety factor, expressed in feet above a calculated flood level, that compensates for unknown factors

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contributing to flood heights greater than the calculated height, including ice jams, wave actions, obstructions of bridge openings and floodways, the effects of urbanization on the hydrology of a watershed, loss of flood storage.

Table 2 presents the elevations of key bridge elements on the Vertical Lift Bridge in comparison to the freeboard elevation level and hurricane inundation levels. As shown in Table 2, the elevations of key bridge elements of the replacement bridge will be higher than the freeboard elevation mandate of Public Act No. 18-82. Compared to existing Walk Bridge, the resistance to hurricane inundation levels with a 2-foot sea level rise will be substantially improved with the replacement bridge.

**Table 2 — Vertical Lift Bridge - Structural Elevations and Resiliency Measures, with a 2-foot Sea Level Rise**

Bridge Element <sup>a</sup>	Elevation (+/-)	Freeboard Elevation (El. 14) <sup>b</sup>	Resistance to Hurricane Inundation Levels <sup>c</sup>			
			Category 1 El. 11.2	Category 2 El. 16.1	Category 3 El. 21.0	Category 4 El. 26.4
Main Span Low Chord	29.14	yes	yes	yes	yes	yes
Approach Span Low Chord	22.35	yes	yes	yes	yes	no
Control House Platform	24.0	yes	yes	yes	yes	no
Electric Room Lowest Floor	156.0	yes	yes	yes	yes	yes
Machine Room (Drive Machinery & Motors) Lowest Floor	156.0	yes	yes	yes	yes	yes

Notes:

a. Elevations of the bridge elements are based on Final Design.

b. Freeboard elevation equals the base flood elevation (at 12 ft NAVD88) plus an additional 2 feet, per Public Act No. 18-82.

c. Elevation shown for peak water surface elevation (NAVD88) with incorporation of 2-foot sea level rise.

CTDOT is designing the Vertical Lift Bridge as a tower-driven bridge. In a tower-driven configuration, the machinery is mounted on top of the tower. As shown in Table 2, the elevation of the machinery will be substantially higher than the mandate of Public Act 18-82 to incorporate freeboard. All critical elements of the replacement bridge will be able to withstand Category 3 hurricane levels with a two-foot sea level rise. Except for the approach span low chord and the control house platform, the critical elements of the replacement bridge will be able to withstand Category 4 hurricane levels with a two-foot sea level rise.

**Attachment D**

**Cultural Resources Supplemental Reports**



**Supplementary Historic Resources Evaluation Report:  
Relocation of the Fort Point Street Railroad Bridge  
(State Bridge No. 04131R)**

**Walk Bridge Replacement Project  
Norwalk, Connecticut**

**State Project No. 0301-0176**

**Prepared for HNTB Corporation  
Boston, Massachusetts**

**by**

**Archaeological and Historical Services, Inc.  
Storrs, Connecticut**

**for submission to**

**The Connecticut Department of Transportation**

**Author:**

**Bruce Clouette, Ph.D.**

**February 2019**



## **ABSTRACT AND MANAGEMENT SUMMARY**

The State of Connecticut, through the Department of Transportation (CTDOT), is planning to replace the 1896 Norwalk River Railroad Bridge (State Bridge No. No. 04288R, also known as the Walk Bridge) in Norwalk, Connecticut. A report presenting the historic properties that would be affected by the project was completed in 2016 (Clouette et al. 2016) and a Memorandum of Agreement (MOA) was executed by the Federal Transit Administration (FTA), CTDOT, the Connecticut State Historic Preservation Office (CTSHPO), and other interested parties.

One of the project's components at that time was the replacement of the Fort Point Street Railroad Bridge (State Bridge No. 04131R), a 1941 steel-beam structure built on earlier stone abutments, with a new bridge at the same location. The project has now been revised to include realigning Fort Point Street north of its intersection with Van Zant Street so as to line up with South Smith Street on the north side of the railroad right-of-way (ROW), resulting in a new location for the replacement railroad bridge approximately 100' to the west. An Area of Potential Effects (APE) for the revised project was delineated to include the railroad ROW between the existing Fort Point Street Railroad Bridge and the location of the new bridge, the area where the re-aligned Fort Point Street will be constructed, and all associated street improvements.

This report presents an analysis of the impacts of the revised project on above-ground historic properties, i.e., properties within or adjacent to the APE that meet the criteria of eligibility for listing in the National Register of Historic Places (NRHP). The project's MOA identified the former New Haven Railroad rail line within the project limits as an NRHP-eligible linear historic district. The MOA provided for written and photographic documentation to CTSHPO standards as mitigation for adverse effects to contributing components of the NRHP-eligible historic rail line, including the Fort Point Street Railroad Bridge (State Bridge No. 4131R). The realignment of Fort Point Street, resulting in a new location for the replacement bridge 100' west of the current crossing, has substantially the same adverse effect as the replacement of the bridge at its current location. The mitigation stipulated in the MOA has already been completed.

One other NRHP-eligible property was identified, the former Crofut & Knapp Hat Factory at 25 Van Zant Street. Because a narrow strip of the property fronts on Fort Point Street, it was included in this analysis. However, the factory complex on the property has only minimal physical proximity and no visual relationship to the project area. The project will have no adverse effects on this property.

No other buildings more than 50 years old within or adjacent to the APE were judged to be eligible for the NRHP, primarily because extensive alterations resulted in a lack of integrity of design, materials, feeling, and association. This conclusion applies to the buildings at 21 Fort Point Street that lie in the path of the proposed realignment.

None of the buildings within or adjacent to the APE that are less than 50 years old appears to have any "exceptional importance" that would make it eligible for the NRHP.

The conclusions and recommendations herein are the opinion of the historic-preservation consultant. Actual determinations of NRHP eligibility and assessment of effects are properly part of the ongoing consultative process among FTA, CTDOT, CTSHPO and other stakeholders.

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## **I. INTRODUCTION**

### **A. Introduction**

The State of Connecticut, through the Department of Transportation (CTDOT), is planning to replace the 1896 Norwalk River Railroad Bridge (State Bridge No. 04288R, also known as the Walk Bridge) in Norwalk, Connecticut. A report presenting the historic properties that would be affected by the project was completed in 2016 (Clouette et al. 2016) and a Memorandum of Agreement (MOA) was executed by the Federal Transit Administration (FTA), the Connecticut Department of Transportation (CTDOT), the Connecticut State Historic Preservation Office (CTSHPO), and other interested parties.

One of the project's components at that time was the replacement of the Fort Point Street Railroad Bridge (State Bridge No. 04131R), a 1941 steel-beam structure built on earlier stone abutments, with a new bridge at the same location. The project has now been revised to include realigning Fort Point Street north of its intersection with Van Zant Street so as to line up with South Smith Street on the north side of the railroad right-of-way (ROW), resulting in a new location for the replacement railroad bridge approximately 100' to the west (see Figure 1, Location Map, and Figure 2, Site Plan, Appendix A). The realigned Fort Point Street will be constructed with 11-foot lanes, 5-foot bike lanes, and curb. Sidewalks are provided on the east and west sides of the roadway south of the bridge, except under the bridge where a 2-foot safety walk is provided. North of the bridge, a sidewalk is provided on the north side where Fort Point Street runs east-west. Utilities and storm sewers in the existing Fort Point Street will be relocated to the new alignment. The existing bridge will be removed and the gap between the abutments filled in to top-of-rail elevation. The pavement for the old alignment of Fort Point Street will be removed and new driveways leading to the new alignment will be constructed for the properties on the east side. The primary purpose of the realignment is to improve the functionality of the intersection of Fort Point Street and South Smith Street. In addition to the safety improvements, the Fort Point Bridge realignment will alleviate bridge construction impacts, as the new bridge and relocated Fort Point Street will be constructed off-line while traffic is maintained on the existing Fort Point Street, with only very limited street closures.

This report presents an analysis of the impacts of the revised project on above-ground historic properties; archaeological impacts are addressed in a separate memorandum. Funding will be provided in part by FTA, requiring the project to comply with the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act of 1966, as amended, and Section 4(f) of the United States Department of Transportation Act. These federal laws require consultation with CTSHPO regarding possible project-related impacts to archaeological and historical resources listed in or eligible for listing in the National Register of Historic Places (NRHP). In addition, the project will receive state funding, requiring it to comply with the Connecticut Environmental Policy Act (CEPA), which mandates consideration of possible impacts to significant historic and archaeological resources, including those listed on the NRHP and State Register of Historic Places (SRHP).

The report was prepared by Archaeological and Historical Services, Inc. (AHS), under contract to HNTB Corporation, the project's consulting engineers. AHS Senior Historian Bruce Clouette, Ph.D., and Architectural Historian Marguerite Carnell, M. Phil., inspected the project area in October 2018 and January 2019. A thorough survey of the vicinity of the project was conducted on foot, resulting in field notes and several dozen photographs of potentially impacted historic properties. The results of the historic resources evaluation will be incorporated into an Environmental Re-evaluation Consultation for FTA pursuant to NEPA and Section 4(f).

## **B. Delineation of the Area of Potential Effects (APE)**

For historic properties, the Area of Potential Effects (APE) for the Fort Point Street realignment project was delineated so as to include the railroad ROW between the existing Fort Point Street Railroad Bridge and the location of the new bridge, the area where the realigned Fort Point Street will be constructed, and all associated street improvements to Fort Point Street and South Smith Street. Properties within or adjacent to the APE were evaluated for NRHP eligibility and for possible adverse effects.

## **C. Format of the Report**

Because this report is a supplement to the Historic Resources Evaluation Report, August 2016, the Methodology and Historical Background sections are not included. The methodology, including field inspection, background research using published histories of Norwalk and historic maps, and evaluation of significance using the criteria of the NRHP and SRHP, was identical to that of the earlier survey, reference to which will provide greater detail. The entire area associated with the realignment and bridge replacement was included in the Historic Background section of the earlier report, so none of that history is repeated here. Section II of this report presents the historic properties that were identified within or adjacent to the APE; Section III evaluates the effect of the Fort Point Street realignment and bridge-relocation on NRHP-eligible properties (no properties eligible only for the SRHP were identified); Section IV presents conclusions and recommendations; and Section V includes all references.

## II. IDENTIFIED HISTORIC RESOURCES

### A. Railroad-Related Structures

The earlier report identified the railroad ROW within the Walk Bridge project area as an NRHP-eligible linear historic district significant for its role in the transportation history of Connecticut (NRHP Criterion A) and for its numerous historic engineering features (Criterion C). Among the district's contributing components that are within or adjacent to the APE for the street realignment and bridge relocation are the existing **Fort Point Street Railroad Bridge** (Photographs 1-3, Appendix B) and a section of **stone retaining wall** along the south side of Fort Point Street, north of the bridge (Photograph 4). These components of the NRHP-eligible linear historic district are described in greater detail in the earlier report and in the state-level written and photographic documentation prepared for the project (Carnell and Clouette 2018), pursuant to the Memorandum of Agreement (MOA) among FTA, CTDOT, and CTSHPO. The only catenary-related feature between the locations of the existing and relocated bridge is Catenary Bridge 534A, which is a modern structure. Catenary Bridges 534 and 535 lie outside the limits of the bridge relocation (see Figure 3).

### B. Other Historic Properties

Only one property within or adjacent to the APE was identified as potentially NRHP-eligible, the former **Crofut & Knapp Hat Factory, 25 Van Zant Street** (Photograph 5), a large four-story reinforced-concrete brick-faced factory complex built in 1923. Its NRHP eligibility is based upon the importance of the hat industry in the economic history of Norwalk (Criterion A). In 19<sup>th</sup> and early 20<sup>th</sup>-century Norwalk, hat manufacturing employed thousands of workers and accounted for a substantial share of the national market for headwear. Like other manufacturers, the hat industry started out in South Norwalk but expanded into East Norwalk in the early 20<sup>th</sup> century. This particular factory employed 1,000 people when it opened, making 15 million hats a year; employment peaked at around 3,000 workers at mid-century (Karmazinas 2015). The property, which is currently being renovated, was included in this analysis because the rear parking area extends to Fort Point Street (see Figure 3).

### C. Properties More Than 50 Years Old But Not NRHP-Eligible

Several other properties that are more than 50 years old were identified within or adjacent to the APE; none is recommended as NRHP-eligible:

- **Restaurant and house, 21 Fort Point Street** (Photographs 6-7), 2½ stories, 21'-by-27' in plan with numerous one-story additions, three-bay gable-end façade. The building has composition siding and modern replacement windows throughout. The shed-roofed front porch, brick planters, and brick facing on the lower part of the front all appear to be of relatively recent construction. The Sanborn maps show the building in use as a store in 1922 and as a restaurant in 1950 (Figures 5 and 6). Directory listings indicate the store was vacant in 1928. In the 1930s and 1940s, it was occupied by the Louis Novak tavern and later by Kenny's Bar & Grill (*Norwalk Directory* 1928, 1935, 1951).

At the rear of the property is a second two-story frame gable-roofed building (Photograph 8), measuring 28'-by-31' in plan, with a sided exterior, modern windows, a wooden exterior stairway, and an added external chimney. The only indication of its

date of construction (1900 in the Norwalk Assessor records) is the stone foundation. The building probably started out as a barn; it is shown as a garage on the 1922 Sanborn insurance map and as a dwelling on the 1950 map (Figures 5 and 6).

As simple vernacular buildings with no apparent historical significance, the two structures do not rise to the level of NRHP eligibility. Moreover, the extent of alterations on both the front building and the rear building result in a lack of integrity of design, materials, feeling, and association. The property is not recommended as NRHP-eligible.

The realignment of Fort Point Street passes through this property, requiring the demolition of both buildings on the parcel.

- **House, 35 Fort Point Street** (Photograph 9), 2½ stories, 34'-by-35' in plan, three-bay gable-end façade. The partly-enclosed front porch features square columns and a solid railing. The house has been sided and has modern one-over-one and six-over-one windows. The two-story flat-roofed portion at the southeast corner formerly accommodated a small store; directory listings in the 1920s and 1930s indicate the store as vacant (*Norwalk Directory* 1928, 1932).

As a simple vernacular house of the late 19<sup>th</sup> century with no apparent historical significance, this property does not appear to rise to the level of NRHP eligibility. Moreover, the siding, window replacement, and front-porch alterations have resulted in a loss of integrity of design, materials, feeling, and association. The property is not recommended as NRHP-eligible.

Paving improvements on Fort Point Street terminate in front of this property.

- **City of Norwalk Waste Water Treatment Plant, 15 South Smith Street** (Photograph 10). The oldest part of the plant, built in 1931, is a flat-roofed brick building, two stories tall, with its overall plan measuring 74' by 85'. The older part is embedded in later additions on three sides, obscuring it from view. The two soda-ash tanks originally associated with the building (see Figure 7) are no longer in place, superseded by more modern water-treatment facilities. The interior of the building was converted to office space in the 1990s, and no historic equipment remains (Kolb 2019).

At one time, this property may have had some claim to NRHP eligibility as a representative first-generation sewage-treatment plant. However, the extensive additions to the original building, the removal of pumps, valves, piping and other historical equipment, and changes in the associated outside treatment facilities have resulted in a lack of integrity of materials, design, setting, and association. Overall, the complex dates from the late 20<sup>th</sup> century, with only a partially visible building shell to suggest its 1930s origins. The property is not recommended as NRHP-eligible.

This property is adjacent to street improvements planned for South Smith Street.

#### **D. Properties Less than 50 Years Old**

Ordinarily, properties that have achieved significance within the past 50 years are eligible for the NRHP only if they are “of exceptional importance,” a high threshold that requires a well-developed historic context, comparison with similar properties, and a record of scholarly



analysis. The following less-than-50-year-old properties are within or adjacent to the APE but do not meet the definition of exceptional importance:

- **Seaview Apartments, 11 Fort Point Street** (Photograph 11), three three-story buildings, each approximately 36'-by-100' in plan, gable roofs, clapboard exteriors, built in 1980. Street improvements associated with the realignment of Fort Point Street begin at the northeast corner of this property.
- **Perfect Plantings, commercial garage, 19 Fort Point Street** (Photograph 12), two stories, 40'-by-50' in plan, gable roof, prefabricated metal construction, built in 2015. The realignment of Fort Point Street begins at the northeast front corner of this property.
- **Public-Works Garage (Wallace Bell Garage), 2 South Smith Street** (Photograph 13), one and two stories, 70'-by-150' in plan, flat roof, concrete block construction, built ca. 1980. This property is adjacent to street improvements planned for South Smith Street.
- **Commercial garage, 1 Van Zant Street**, two stories, 35'-by-65' in plan, gable roof, prefabricated metal construction, built in 2003 (Photograph 14). This property is adjacent to the south terminus of the project at the corner of Fort Point Street and Van Zant Street.

### III. ANTICIPATED PROJECT EFFECTS

The project's adverse effects on NRHP-eligible historic properties are limited to the demolition of the existing **Fort Point Street Railroad Bridge**, a contributing component of the rail line as an NRHP-eligible linear historic district, and the introduction of the modern replacement bridge within the historic rail line. These adverse effects were anticipated in the earlier report and were addressed in the MOA, which contained the following stipulation for mitigation:

CTDOT shall prepare written and photographic documentation of other historic structures on the New Haven Line, within the limits of the Undertaking, to the professional standards of CTSHPO. The documentation will address the high towers, stone retaining walls, interlocking tower (South Norwalk Switch Tower Museum), Fort Point Street Railroad Bridge, and any historic trackside features such as mileposts.

The state-level written and photographic documentation of historic structures, including the Fort Point Street Railroad Bridge, has been completed (Carnell and Clouette 2018).

The **stone retaining wall** east of the bridge is not expected to be impacted by the Fort Point Street realignment; in any case, it too was included in the state-level written and photographic documentation cited above.

The former **Crofut & Knapp Hat Factory**, 25 Van Zant Street, is not physically or visually related to the project area, even though a driveway for the rear parking area leads from present-day Fort Point Street. The complex's main elevation faces south toward Van Zant Street, with no part less than 400' away from Fort Point Street. The only project effect on the property is the longer driveway needed to reach the realigned street (see Figure 2). A finding of No Adverse Effect is recommended with regard to this property.

Other than the bridge itself, demolition associated with the Fort Point Street realignment is limited to the property at 21 Fort Point Street, which is not recommended as NRHP-eligible. For this project action, and for the associated street improvements along Fort Point Street and South Smith Street, a finding of No Historic Properties Affected is recommended.

#### **IV. CONCLUSIONS AND RECOMMENDATIONS**

The only adverse effects on above-ground historic properties arising from the replacement of the Fort Point Street Railroad Bridge and the realignment of Fort Point Street are the loss of the historic bridge itself and the introduction of a modern element (the replacement bridge) within the historic rail line. These effects were considered in the project's earlier Section 106 consultation and mitigation of the effects was included in the project's MOA.

Only one other NRHP-eligible property within or adjacent to the APE was identified, the former Crofut & Knapp Hat Factory, 25 Van Zant Street. The property's physical proximity and visual relationship to the project area is minimal; it was included in this analysis only because a small portion of the property, a narrow strip for a driveway leading from present-day Fort Point Street to the rear parking area, is adjacent to the APE.

None of the other buildings within or adjacent to the APE that are more than 50 years old appear to be NRHP-eligible. All have been substantially altered from their historic appearance, including the buildings at 21 Fort Point Street that lie in the path of the realignment.

None of the buildings within or adjacent to the APE that are less than 50 years old appears to have any "exceptional importance" that would make it eligible for the NRHP.

The conclusions presented in this report represent the opinions of the project's historic preservation consultants. Actual determinations of NRHP eligibility, assessment of effects, and consideration of mitigative actions are all properly part of the ongoing consultative process among FTA, CTSHPO, and CTDOT, and will be further developed as the project progresses.

## V. REFERENCES

Carnell, Marguerite, and Bruce Clouette

2018 *Written and Photographic Documentation: New York, New Haven & Hartford Railroad, South Norwalk and East Norwalk, Norwalk, Connecticut.* Storrs, CT: Archaeological and Historical Services, Inc.

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2016 *Historic Resources Evaluation Report: Walk Bridge Replacement Project, Norwalk, Connecticut, State Project No. 0301-0176.* Storrs, CT: Archaeological and Historical Services, Inc.

Fairchild Aerial Survey

1934 Aerial photographs of Connecticut. Connecticut State Library, Hartford, CT.

Karmazinas, Lucas A.

2015 “Crofut & Knapp Co., Norwalk,” Mills: Making Places, a Project of the Connecticut Trust for Historic Preservation, online at <https://connecticutmills.org/find/details/crofut-knapp-co>, retrieved January 2018.

Kolb, Ralph

2019 Personal communication with Ralph Kolb, P.E., Senior Environmental Engineer, Norwalk Water Pollution Control Authority, January 3, 2019.

Landis & Hughes

1899 *Norwalk, South Norwalk, and East Norwalk, Conn.* Bird’s-eye view. New York.

*Norwalk Directory*

1926- *Norwalk Directory.* New Haven, CT: Price & Lee Company.

Sanborn Map and Publishing Company [company name varies]

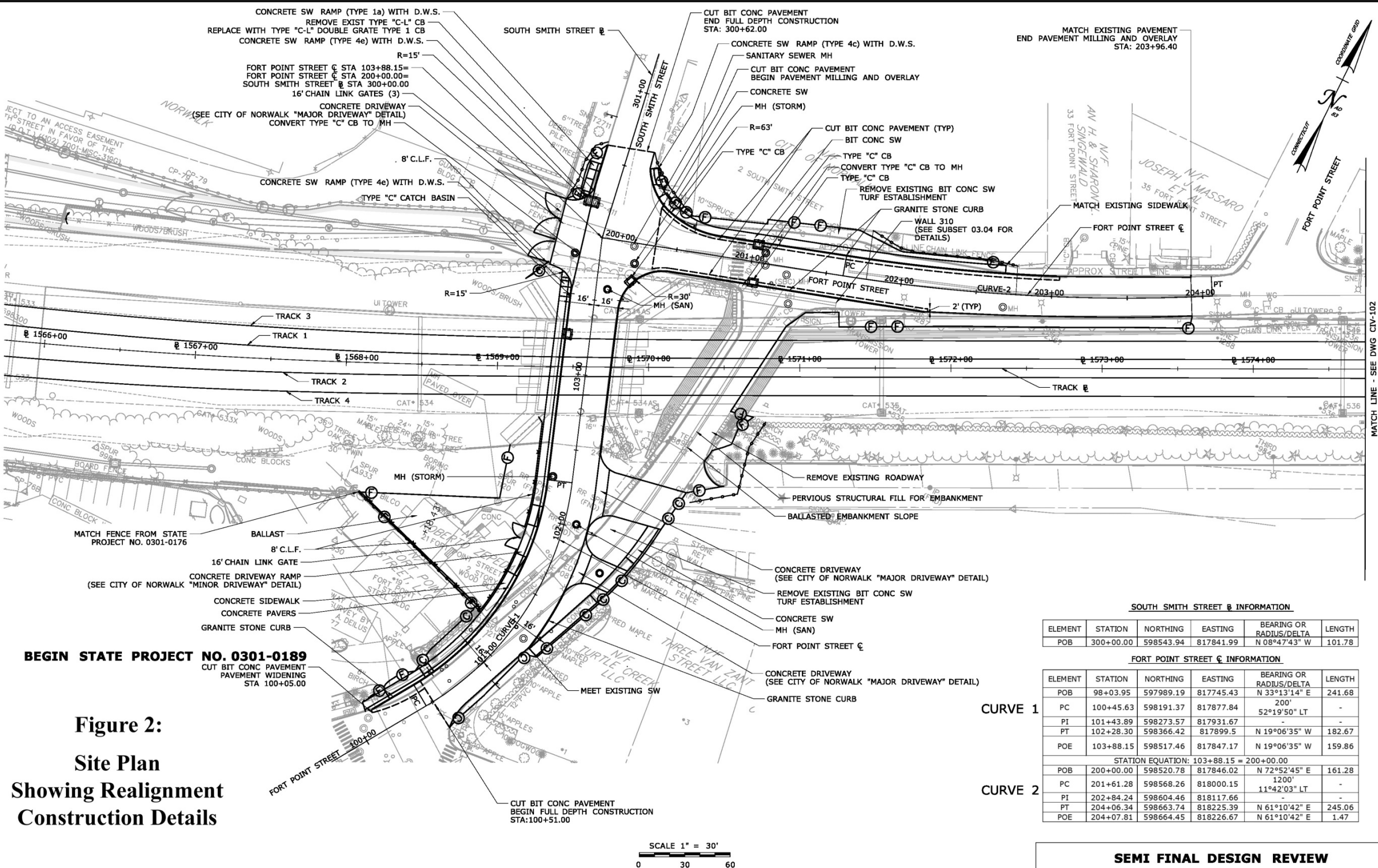
1922 - Insurance maps of Norwalk. Microfilm, Connecticut State Library, Hartford, CT.

**APPENDIX A:**  
**FIGURES**

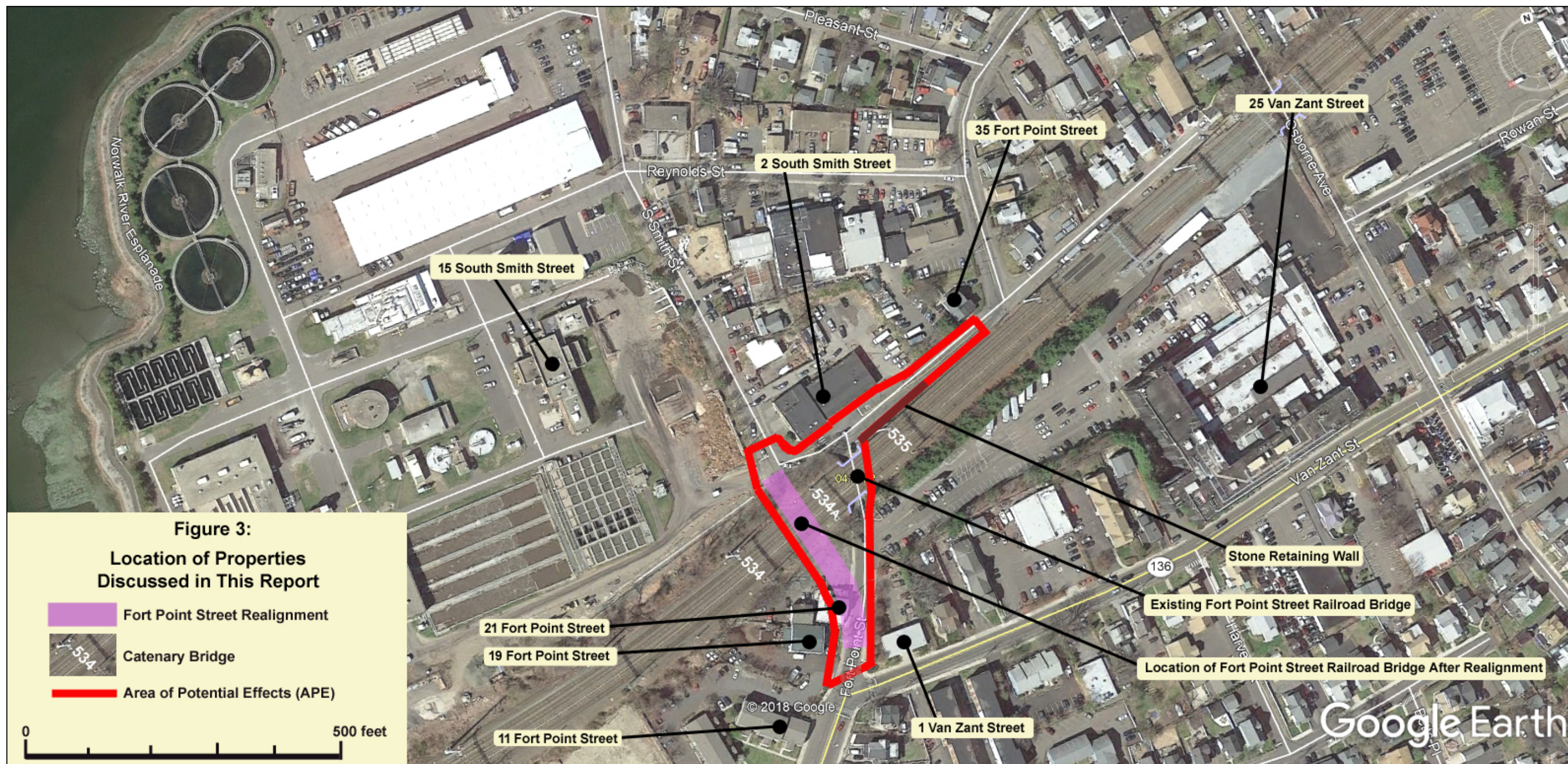


**Figure 1: Location of bridge-relocation project (shaded), shown on USGS Norwalk South Quadrangle, Scale 1:24000.**

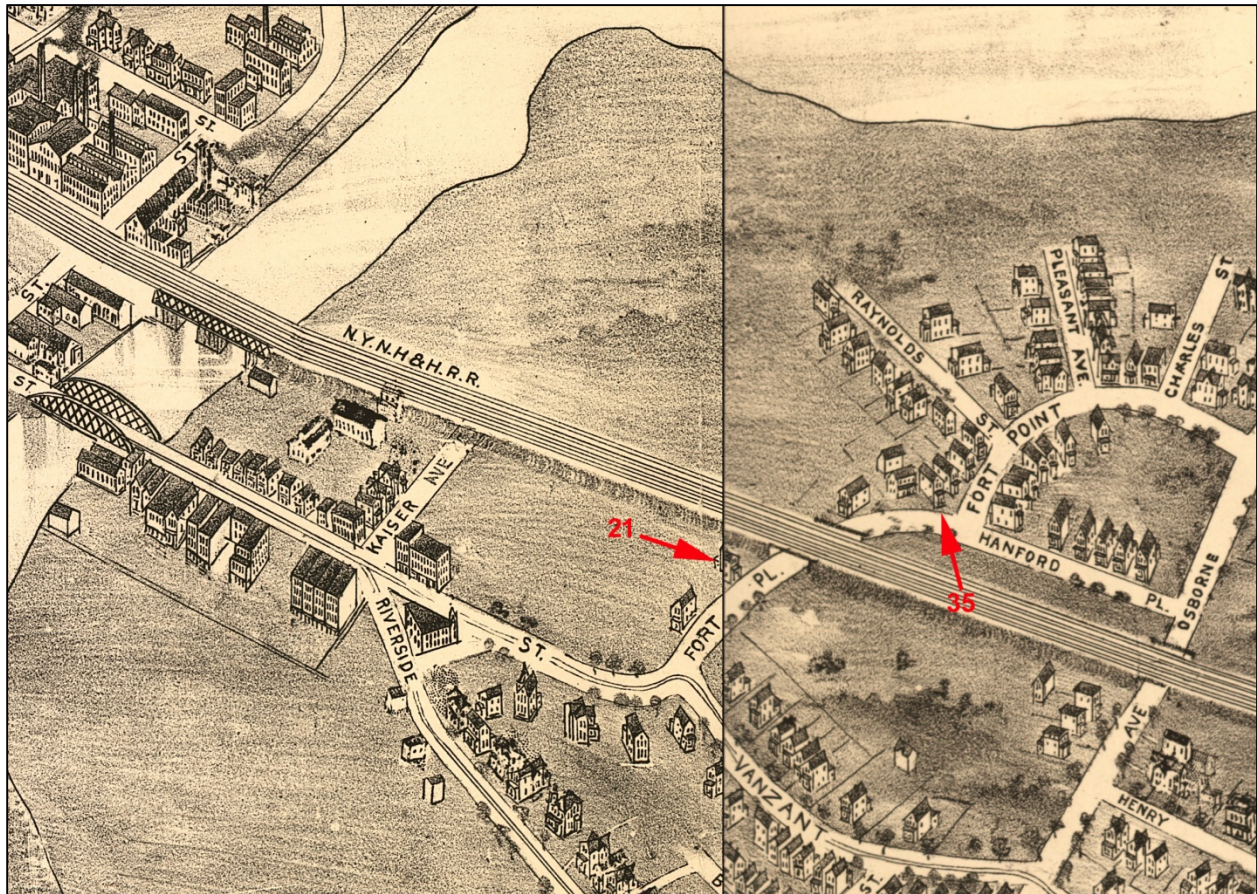




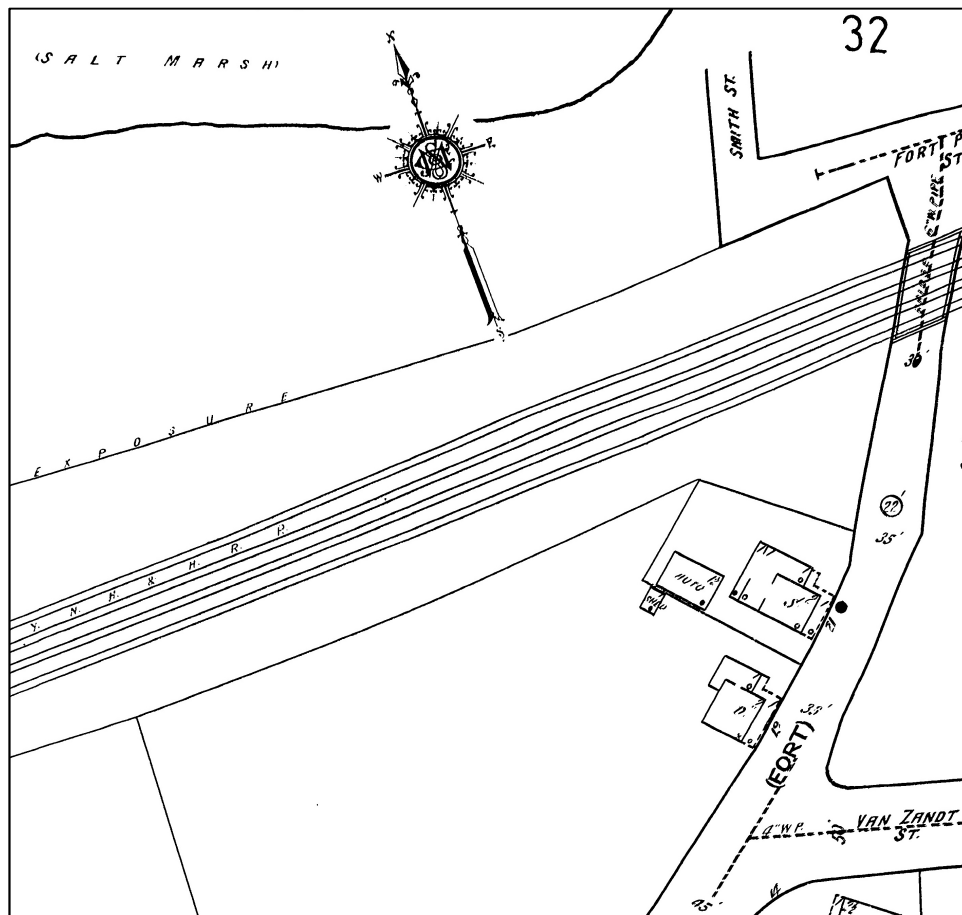




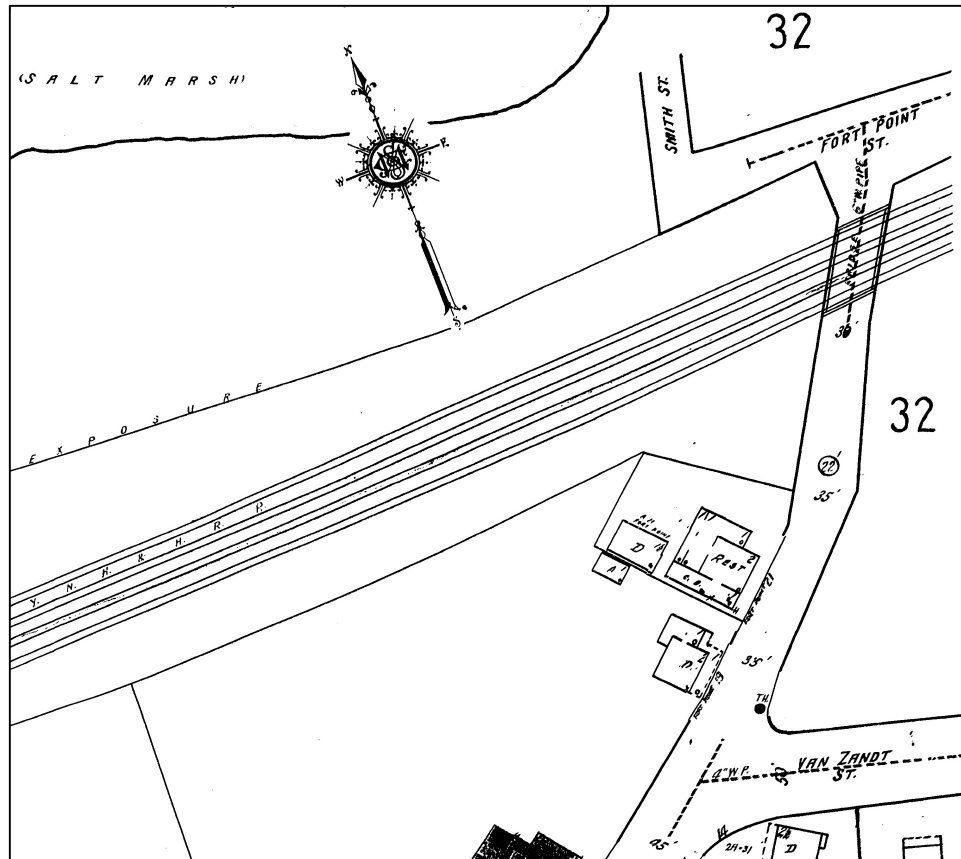




**Figure 4:** Project vicinity as shown on the 1899 Landis and Hughes bird's-eye view. The houses at 21 and 35 Fort Point Street appear to be present (arrows).



**Figure 5: Buildings at 21 Fort Point Street, as shown on the 1922 Sanborn insurance map. The rear building is in use as a garage and the front building is in use as a store.**



**Figure 6:** The buildings at 21 Fort Point Street as shown on the 1950 update of the 1922 Sanborn insurance map. The rear building is indicated as a dwelling, and the front building is in use as a restaurant.



**Figure 7:** The water treatment plant as shown on the 1934 Fairchild aerial photograph.

**APPENDIX B:**  
**PHOTOGRAPHS**





**Photograph 1: Fort Point Street Railroad Bridge (1941), south elevation, camera facing north.**



**Photograph 2:** Fort Point Street Railroad Bridge, detail of south end of east abutment, camera facing east.





**Photograph 3:** Track level view of Fort Point Street Bridge, showing historic catenary support structure from the 1914 electrification, camera facing southwest.





**Photograph 4: Retaining wall east of Fort Point Street Railroad Bridge, camera facing southwest.**



**Photograph 5: Former Crofut & Knapp Hat Factory (1923), 25 Van Zant Street (parking area at rear extends to Fort Point Street), camera facing northeast.**





**Photograph 6:** House at 21 Fort Point Street (ca. 1875), currently in use as a restaurant, camera facing northwest.



**Photograph 7: Rear of house at 21 Fort Point Street, currently in use as a restaurant, camera facing southeast.**





**Photograph 8: Building at the rear of 21 Fort Point Street (ca. 1900), camera facing southwest.**



**Photograph 9: House at 35 Fort Point Street (ca. 1880), camera facing northeast.**





**Photograph 10: Norwalk Waste-Water Treatment Plant (1931, with later additions), 60 South Smith Street, camera facing northwest.**



**Photograph 11: Seaview Apartments (1980), 11 Fort Point Street, camera facing west.**





**Photograph 12: Commercial garage (2015), 19 Fort Point Street, camera facing northwest.**



**Photograph 13: Public-Works Garage (Wallace Bell Garage, ca. 1980), 2 South Smith Street, camera facing northwest.**



**Photograph 14: Commercial garage (2003), 1 Van Zant Street, camera facing east.**

**SUPPLEMENTARY TECHNICAL MEMORANDUM**  
**ARCHAEOLOGICAL SENSITIVITY ASSESSMENT**  
**RELOCATION OF THE FORT POINT STREET RAILROAD BRIDGE**  
**(State Bridge No. 04131R)**

**WALK BRIDGE REPLACEMENT PROJECT**  
**NORWALK, CONNECTICUT**

**State Project No. 0301-0176**

**Prepared for**

**HNTB Corporation**  
**31 St. James Street, Suite 300**  
**Boston, Massachusetts**

**by**

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**March 2019**



## I. INTRODUCTION

The State of Connecticut, through the Department of Transportation (CTDOT), is planning to replace the 1896 Norwalk River Railroad Bridge (State Bridge No. 04288R, also known as the Walk Bridge) in Norwalk, Connecticut. A 2016 report assessed archaeological resources that would be affected by the project as then conceived (Sportman 2016) and a Memorandum of Agreement (MOA) was executed by the Federal Transit Administration (FTA), the Connecticut Department of Transportation (CTDOT), the Connecticut State Historic Preservation Office (CTSHPO), and other interested parties regarding archaeological and historical resources.

One of the project's components at that time was the replacement of the Fort Point Street Railroad Bridge (State Bridge No. 04131R), a 1941 steel-beam structure built on earlier stone abutments, with a new bridge at the same location. The project has now been revised to include realigning Fort Point Street north of its intersection with Van Zant Street so as to line up with South Smith Street on the north side of the railroad right-of-way (ROW), resulting in a new location for the replacement railroad bridge approximately 100' to the west (see Figure 1, Location Map, and Figure 2, Site Plan, Appendix A). An Area of Potential Effects (APE) for the revised project was delineated to include the railroad ROW between the existing Fort Point Street Railroad Bridge and the location of the new bridge, the area where the re-aligned Fort Point Street will be constructed, and all associated street improvements. The realigned Fort Point Street will be constructed with 11-foot lanes, 5-foot bike lanes, and curbing. Sidewalks will be provided on the east and west sides of the roadway south of the bridge, except under the bridge where a 2-foot safety walk will be provided.

North of the bridge, a sidewalk is provided on the north side where Fort Point Street runs east-west. Utilities and storm sewers in the existing Fort Point Street will be relocated to the new alignment. The existing bridge will be removed and the gap between the abutments filled in to top-of-rail elevation. The existing bridge superstructure will be completely removed along with approximately the top 6 feet of the existing abutments. The area between the existing abutments will be backfilled to the top of track ballast elevation; the existing abutment will not be visible upon completion of construction. The pavement for the old alignment of Fort Point Street will be removed and new driveways leading to the new alignment will be constructed for the properties on the east side. The primary purpose of the realignment is to improve the functionality of the intersection of Fort Point Street and South Smith Street. In addition to the safety improvements, the Fort Point Bridge realignment will alleviate bridge construction impacts, as the new bridge and relocated Fort Point Street will be constructed off-line while traffic is maintained on the existing Fort Point Street, with only very limited street closures.

This technical memorandum presents an analysis of the impacts of the revised project on archaeological resources; above-ground historic properties are addressed in a separate report (Clouette 2019). Funding will be provided in part by FTA, requiring the project to comply with the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act of 1966, as amended, and Section 4(f) of the United States Department of Transportation Act. These federal laws require consultation with CTSHPO regarding possible project-related impacts to archaeological and historical resources listed in or eligible for listing in the National Register of Historic Places (NRHP). In addition, the project will receive state funding, requiring it to comply with the Connecticut Environmental Policy Act (CEPA), which mandates consideration of possible impacts to significant historic and archaeological resources, including those listed on the NRHP and State Register of Historic Places (SRHP).

The memorandum was prepared by Archaeological and Historical Services, Inc. (AHS), under contract to HNTB Corporation, the project's consulting engineers. AHS Senior Archaeologist David Leslie conducted the fieldwork and wrote the memorandum. The results of the memorandum will be incorporated into an Environmental Re-evaluation Consultation for FTA pursuant to NEPA and Section 4(f).

## II. SCOPE OF SERVICES

The purpose of the Phase IA survey was to assess the potential for the proposed project actions in the APE, shown in Figure 3, to affect undisturbed archaeological resources. Previous archaeological surveys (Sportman 2016), including geotechnical cores (Geoprobe), have been conducted within the project vicinity (Leslie and Ouimet 2017) (Figure 3). These soil cores were extracted from a Genuine Geoprobe machine, facilitated by Terracon, in the Fall of 2016 and Winter of 2017. In total, 37 geoprobes were extracted to a depth of approximately 28 to 36 feet below the ground surface, depending on whether they met with refusal. The first five feet of the core extraction were vacuum extracted using a Vac-Truck, and soils were described separately from analyzed cores (see Leslie and Ouimet 2017).

The survey was a “desktop” and walkover assessment, which included a visual inspection of the APE and the collection and analysis of available data regarding previously recorded cultural (i.e., archaeological and historical) resources in the APE and vicinity and the evaluation of potential impacts of proposed project actions. The survey included review of recorded archaeological sites in the Office of State Archaeology (OSA)/CTSHPO archaeological site files database; review of NRHP-listed and SRHP-listed districts and structures; review of historic-period and aerial maps; and review of modern aerials, photographs, Natural Resource Conservation Service (NRCS) soil maps, topographic maps, and previous Geoprobe collected in the project APE. Data from these sources was synthesized in order to assess archaeological sensitivity of the APE.

### III. RESULTS OF ASSESSMENT

Previous work in the project area (Figure 2) included three geoprobes, Geoprobes #20, 21, and 26 which are within or near the APE, although only #20 is within the APE (Figures 3 and 4). In short, Geoprobes #20 and 21 contained disturbed soil sequences with urban refuse overlying a more ancient glacio/fluvial layer; these probes do not indicate any areas of archaeological sensitivity. Geoprobe #26, however, did contain a buried intact paleosol (old soil sequences), which likely indicates an area of archaeological sensitivity; this paleosol is located approximately 10 feet below the ground surface, but beneath significant landfill disturbed soils, similarly to Geoprobes #20 and 21. Paleosols are older soils that were interrupted by past events such as increased flooding or erosion; these soils are often very similar to those that form in a modern area, but are simply buried or capped. In Geoprobe #26, the paleosol sequence was a dark black, organic rich upper soil with a secondary weathered clay-rich horizon preserved as well (see Leslie and Ouimet 2017). Based on a visual inspection of the APE (Photographs 1-3, Appendix B), updated project plans (Figure 2), and overlaying the geoprobes with the APE (Figure 4), AHS is confident that the proposed realignment of Fort Point Street Bridge will not impact any intact archaeological resources. The only potential archaeological resources are located at least 10 feet below the existing ground surface, are outside of the APE, and protected by 10 feet of disturbed overlying soil sequences.

#### **IV. CONCLUSIONS AND RECOMMENDATIONS**

Based on the results of the Phase IA assessment, no intact archaeological resources will be impacted by the construction of the Fort Point Street Bridge realignment. Supplementary archaeological surveys are not recommended, as they would be highly unlikely to document additional archaeological resources within the project area.

## V. REFERENCES

Clouette, Bruce

2019 *Supplementary Historic Resources Evaluation Report: Relocation of the Fort Point Street Railroad Bridge (State Bridge No. 04131R)*. Storrs, CT: Archaeological and Historical Services, Inc

Leslie, David E. and William Ouimet.

2017 *Interim Report. Phase I Terrestrial, Intertidal, and Underwater Georarchaeological Investigations*. Storrs, CT: Archaeological and Historical Services, Inc.

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2016 *Technical Report. Archaeological Sensitivity Assessment of the Walk Bridge Replacement Project*. Storrs, CT: Archaeological and Historical Services, Inc



## **Appendix A**

### **Figures**



Figure 1: USGS topographic map of APE and vicinity.







Figure 3: Project APE and previous Geoprobess coring locations.





**Appendix B**  
**Photographs**





**Photograph 1: Existing Fort Point Street Bridge, looking north to area of relocation and where Geoprobe #20 was collected.**





**Photograph 2: Existing Fort Point Street Bridge and relocation area looking south.**





**Photograph 3: Fort Point Street relocation area looking southwest.**

## **Attachment E                      Required Federal and State Permits and Approvals**

**Table of Required Federal and State Approvals**

<b>Federal/State Regulation</b>	<b>Review/Approval/Permit</b>
National Environmental Policy Act (42 USC 4321 et seq)	Finding of No Significant Impact #
Connecticut Environmental Policy Act (CGS Section 22a-1-22a-1h)	Record of Decision
Section 4(f), U.S. Department of Transportation Act (49 USC 303)	Individual Evaluation and Finding for potential use of Section 4(f) properties
Executive Order 11988, Floodplain Protection, as amended by Executive Order 13690, Federal Flood Risk Management	Review for impact to floodplain
Executive Order 11990, Wetlands Protection	Review for impact to wetlands
Executive Order 12898, Environmental Justice	Review for assessment of impact to EJ communities
Title VI Program/FTA Circular 4702.1B of October 1, 2012	Environmental Equity Review
Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 (42 USC 4601 et seq); Uniform Relocation Assistance Act (CGS Section 8-266 et seq)	Review/relocation assistance
Clean Air Act (42 USC 7401 et seq)	Conformity Determination
Section 106, National Historic Preservation Act (36 CFR 800)	Memorandum of Agreement
Section 7, Endangered Species Act (16 USC 1531 et seq)	Finding/Not Likely to Adversely Affect #
Magnuson-Stevens Fishery Conservation and Management Act (16 USC 1801 et seq)	Finding and Recommendations #
Coastal Zone Management Act/Connecticut Coastal Management Act (16 USC 1451 et seq)	Consistency Review
Section 9 of the Rivers and Harbors Act (33 USC 491)	Permit for construction of new bridge
Section 10 of the Rivers and Harbors Act (33 USC 403)	Permit for dredging and filling in navigable waters/ impacts to waters and wetlands of the U.S.
Section 404 of the Clean Water Act (33 USC 1344)	
Section 14 of the Rivers and Harbors Act (33 USC 408)	Permit for impact to federal navigation channel
Section 401 of the Clean Water Act (33 USC 1341); Connecticut Surface Water Quality Standards (CGS Section 221-426)	Water Quality Certification
Section 402 of the Clean Water Act (33 USC 1342); General Conditions Applicable to Water Discharge Permits and Procedures and Criteria for Issuing Water Discharge Permits (CGS Section 22a-430b)	General Permit for Discharge of Stormwater and Dewatering Wastewaters from Construction Activity
49 CFR 77; Safe, Efficient Use and Preservation of the Navigable Airspace	Notice of Proposed Construction or Alteration (pending siting of bridge-related utilities)
Connecticut Endangered Species Act (CGS Section 26-303)	Natural Diversity Database Review
Connecticut Coastal Management Act; and Tidal Wetlands Regulations (CGS Section 22a-30-1)	Structures, Dredge and Fill, and Tidal Wetlands Permit

**Connecticut Department of Transportation  
Walk Bridge Replacement Project**

<b>Federal/State Regulation</b>	<b>Review/Approval/Permit</b>
Connecticut Flood Management Program (CGS Sections 25-68b - 25-68h)	Flood Management Certification
CGS Section 22a-134, et seq., Hazardous Materials	Review of potential for hazardous material impacts, high-risk sites, site investigations, and environmental audits
CGS Section 22a-133z and 22a-208a	General Permit for Contaminated Soil and/or Sediment Management
CGS Chapter 446d and 446k, RCSA Sections 22a-208a-1, 22a-209-1, and 22a-209-8	Authorization for Disposal of Special Waste
CGS Section 22a-430(b)	General Permit for the Discharge of Groundwater Remediation Wastewater
# Determination made after EA/EIE	