



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N
Public and Agency Involvement**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N1
Public Involvement Plan**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration



Route 7-15 Norwalk

Routes 7 / 15 Interchange State Project No. 102-358 Norwalk, CT

Public Involvement Plan (Winter 2021)

Public Involvement Program

The following is a detailed description of the Public Involvement Plan (PIP) proposed for the Connecticut Department of Transportation (CTDOT) Project No. 102-358 (7/15 Interchange project) which includes professional services related to the Environmental Planning Studies & Regulatory Permitting, Highway Design, and Bridge / Structural Design of the Route 7 and Route 15 Interchange in Norwalk, Connecticut.

This plan has been developed to outline how, in cooperation with CTDOT and the project stakeholders, the Stantec Project Team will inform and seek input about the plan from the public, key stakeholder agencies and organizations, municipalities, regional planning organizations, and local businesses. Many approaches will be used to let people know what is happening throughout the study and there will be a variety of opportunities for discussion and comment. Public opinion and comments will be documented and considered throughout the development of the project.

The PIP will be periodically revisited, and refinements made throughout the course of the project. The plan is provided to have flexibility to respond appropriately and efficiently to the project as it evolves. This plan will be revised per recommendations from CTDOT, other team members, and from feedback from the Project Advisory Committee (PAC) throughout the alternatives development phase and project scoping. The plan will be made public and available on the project website.

Public Participation Principles

This PIP has been developed to support civic engagement for the study by emphasizing the following principles:

- The public shall have access to information about the study: A record of all PAC and community meetings will be kept. Technical documents will be placed in locations available to the public.
- The public shall be presented with clear information: Information will be clearly written and technical terms and regulatory procedures will be explained.
- The public may learn about or become engaged in the study in a variety of ways: Methods to inform and engage the public will include PAC meetings, public meetings, stakeholder meetings, newsletters, project website, e-bulletins, social media, and newspapers (Norwalk Hour and Stamford Advocate).



Route 7-15 Norwalk

- The public shall be able to engage with a responsive study team: The public and PAC will receive sufficient notice of meetings, which will be scheduled at a time and place that is convenient and comfortable. Ample time to review any materials will also be provided. All public questions and inquiries will be answered in a timely manner.
- The public shall be able to participate in a process that is well coordinated: Good coordination, communication, and collaboration among all concerned agencies and community organizations will be critical to providing the public with the most current and correct information as well as to the overall success of the project.

Elements of the Plan

The PIP has many elements to involve and inform the public in meaningful ways. The Stantec Team will be accessible to the public, share information in a complete and understandable manner, and record and respond to public comments and concerns. Specific elements of the plan will include:

1. Project Management Team (PMT)

The PMT, composed of representatives from CTDOT, will provide oversight, direction, and review for the study. The PMT will collaborate with the Stantec Team to share and review study documents as they are developed. PMT members will use their expertise to provide insights for discussion at team meetings, and will assist the outreach effort by identifying issues, information resources, key stakeholders, and committee and public meeting locations.

Mr. Andy Fesenmeyer, CTDOT's Project Manager, will serve as the overall Project Lead and will be responsible for coordination between the PMT and the Stantec Team, and will guide the work of the Stantec Team. The PMT will provide guidance and review of study documents throughout the project.

Stantec is the prime consultant to CTDOT and, therefore, has direct responsibilities for the execution and performance of the technical services for this project. Other members of the project Consultant Team and their anticipated task responsibilities are listed in **Table 1** below:

Table 1 - Consultant Team Firms, Responsibilities, and Lead Contact Names

Firm	Responsibility	Lead Contact
Stantec	Project lead; project management-engineering design	John Eberle
Fitzgerald & Halliday, Inc.	Project management team	Ken Livingston
Fitzgerald & Halliday, Inc.	Public outreach program	Ken Livingston
Fitzgerald & Halliday, Inc.	NEPA/CEPA tasks	Stephanie Dyer-Carroll

Materials including meeting agendas, study documents, and meeting announcements will be sent to the PMT in advance of meetings to allow adequate time for review. PMT members will be asked to express concerns and provide insights for discussion at Team meetings. Alternatives and impacts will be examined as the study progresses. PMT members will also be asked to assist the outreach effort by identifying issues, information resources, key stakeholders, and meeting locations. An outreach



Route 7-15 Norwalk

timeline will be developed to assign roles and responsibilities for the logistics and materials required for all meetings.

The PMT will meet in-person monthly over the course of the study (up to 36 meetings total) in order to keep all members of the Team informed about the progress of the project.

2. Project Advisory Committee (PAC)

A PAC will be created to guide the study process. Stakeholders/interests represented on the PAC may include, but are not limited to:

- Connecticut Chapter of the American Society of Landscape Architects (CTASLA)
- BikeWalkCT
- City of Norwalk
- Connecticut Trust for Historic Preservation
- Creeping Hemlock/Cranbury Neighborhood
- CT Commuter Council
- CT Trust for Historic Preservation
- Empire State Realty Trust, Inc
- Greater Norwalk Hispanic Chamber of Commerce
- Harbor Point / Building and Land Technology (BLT)
- Marcus Partners/ Merritt 7
- Merritt Parkway Conservancy
- Merritt Parkway Trail Alliance
- Merritt Parkway Trail Alliance
- Norwalk Association of Silvermine Homeowners (NASH)
- Norwalk Bike Walk Commission
- Norwalk Chamber of Commerce
- Norwalk Land Trust
- Norwalk Preservation Trust
- Norwalk River Valley Trail (NRVT)
- Norwalk River Watershed/HarborWatch
- Norwalk Transit District
- Sierra Club
- Silvermine Community
- Silvermine Community Association Board
- Sound Cyclists
- Town of Wilton
- Western Connecticut Council of Governments (WestCOG)
- Others



Route 7-15 Norwalk

PAC members will assist in the study effort by providing advice and insight on local issues, identifying challenges/opportunities in the project area, and assessing improvement alternatives.

The Stantec Team will take a collaborative approach with the PAC. The Stantec Team will share relevant technical information and study products with the PAC as they are developed. Materials will be sent to the group in advance of the meetings to allow adequate time for review before meetings. PAC members will be asked to bring concerns and insights for discussion to the full committee and the consultant team. Alternatives and impacts will be examined as the study progresses. PAC members will also be asked to assist the team in conducting community outreach by identifying issues important to their interests and the public at large, identifying other key stakeholders, and attending public meetings to discuss the progress of the project. These meetings will be held at a location to be determined by CTDOT in the vicinity of the project area.

The PAC will meet as needed during the course of the project. The Stantec Team will coordinate the efforts of the PAC with the input and assistance of CTDOT.

3. Project Website (www.7-15norwalk.com)

A project website will be developed and maintained by the Team throughout the course of the project. This website will be an effective way to support the public participation efforts for this transportation project, by following the progress of the study (including calendar and schedule), advertising meetings, providing access to minutes of meetings and documents, providing media information, including news releases/articles, and allowing people to make comments and ask questions. All content will be fully reviewed and vetted by CTDOT prior to posting on the website. The website will be updated by the Stantec Team monthly, up until the end of the project.

4. Newsletters

The Stantec Team will prepare and electronically distribute newsletter updates at key milestones over the course of the project to a project mailing list. These newsletters will cover significant successes, lessons learned, public responses, and other elements that are important to the project's completion. Newsletters will generally be distributed to coincide with upcoming public meetings. Up to nine (9) two-page newsletters in electronic PDF-format will be prepared and distributed.

5. E-bulletins

E-bulletins will be prepared by the Stantec Team as appropriate to disseminate project information to all parties on the contact list. E-bulletins will contain updates to the project schedule, announcements of upcoming meetings, and relevant information that the team would like to expeditiously distribute to the public. All e-bulletins will be coordinated and reviewed by CTDOT prior to distribution. Up to eighteen (18) E-bulletins will be prepared and distributed.



Route 7-15 Norwalk

6. Public Information Meetings

The Stantec Team will coordinate with CTDOT to conduct six (6) public information meetings during the course of the project. The first meeting will be held shortly after the beginning of the project to present the project and its purpose and need to the public. The priority for this meeting will be as a listening session to hear about stakeholder issues and concerns. This is an opportunity for the public to obtain information about the study and provide their input early in the process.

The subsequent public meetings will be held later in the project development and will present and engage the public for feedback on the alternatives under review.

In collaboration with CTDOT, the Stantec Team will determine that as part of the public outreach process for public information meetings, one (1) public scoping meeting will be held at the outset of the National Environmental Policy Act (NEPA)/Connecticut Environmental Policy Act (CEPA) process, likely between the first and second public information meetings, to receive public input and in order to meet requirements under NEPA/CEPA. A public hearing will be held following the release of the EA/EIE for public review. The Public hearing may include a virtual component. Information regarding virtual public involvement opportunities will be posted to project webpage as it becomes available.

The public meetings and hearings will be generally conducted as open houses. This will allow for public review of documents, opportunities for one-on-one discussion with members of the study team and CTDOT officials, and a formal presentation of the study's purpose and progress followed by a question and answer period. There will be display materials that are graphically rich, written in clear language, and easy for the public to understand at the meetings. Display materials may include maps, timelines, and visualization tools where feasible within the project budget. The Stantec Team will work with CTDOT and the PMT to identify and secure meeting venues and publicize upcoming meetings. There will also be a formal comment period and formal transcript taken of each public hearing with comments received and responses made documented for the NEPA/CEPA record.

The Project Team will develop a press release before each of the public meetings. CTDOT will provide to the appropriate media outlets for such announcements. In addition, to publicize upcoming public meetings.,

7. Stakeholder Outreach

There are approximately thirty-five (35) specific groups of stakeholders that have been involved in past efforts and the intention is to maintain contact with these groups throughout all phases of the project. This continued coordination could be through one-on-one meetings, agency coordination meetings, on-line surveys, workshops, etc. The Stantec Team will conduct up to ten (10) stakeholder outreach meetings throughout the project.

An initial priority at the outset of the project will be to meet with key stakeholder groups to notify them that the project is underway and ask for their input and participation. In general the meetings



Route 7-15 Norwalk

will be held at the offices and/or public locations near the project area. The team will prepare the materials and handouts for these meetings in consultation with CTDOT.

Stakeholders/interests that will be targeted for these meetings may include, but are not limited to:

- Merritt Parkway Conservancy
- City of Norwalk
- Western Connecticut Council of Governments (WestCOG)
- Silvermine Neighborhood Association
- National Trust for Historic Preservation
- Sierra Club
- Norwalk Land Trust
- Norwalk River Watershed Association
- Norwalk Preservation Trust
- Connecticut Trust for Historic Preservation
- Area businesses
- Others

8. Social Media

The Stantec Team will utilize numerous communication tools, traditional and non-traditional, throughout the study process to obtain public input. Recognizing the rise of electronic communication, especially among younger populations, social media will be integrated into the study.

A Facebook page and a Twitter page will be created for the project by the Stantec Team. The Facebook and Twitter accounts set-up during the initial phase of the project will be maintained through the alternatives development and scoping phase of the project. This will include updating information and maintaining the accounts in conformance with the latest information provided on the project website. Links to the social media accounts will be provided on the website for quick access to users. The Stantec Team will work with CTDOT and other project partners to provide updates via their existing social media channels (e.g., Twitter and Facebook) as well.

All social media posts and materials will be coordinated through CTDOT.

9. Facilitate Comment Response

The Stantec Team will document and maintain a database for cataloguing comments received from the public through the various social media outlets, project website, public meetings, and general write-in and through email. This comments catalog database will be maintained throughout the alternatives development and scoping phase of the project. It is anticipated the e-Builder website will facilitate the storing, cataloging and response to these comments. The entire procedure will be set up and maintained to comply with all project NEPA and CEPA requirements.



Route 7-15 Norwalk

10. List of Outreach Activities

Below is a list of the public involvement activities with agencies and stakeholders that CTDOT has conducted as of January 2022.

<u>Activity Outreach Activities as of 1/31/2022</u>	<u>Date</u>
City of Norwalk	6/1/2016
Town of Wilton	6/7/2016
Merritt Parkway Advisory Committee	7/5/2016
Merritt Parkway Conservancy (MPC)	7/29/2016
Western Connecticut Council of Governments (WestCOG)	8/15/2016
Norwalk Association of Silvermine Homeowners (NASH)	10/17/2016
Norwalk Bike/Walk Commission	11/7/2016
City of Norwalk Officials	11/9/2016
Norwalk River Valley Trail (NRVT)	11/9/2016
Norwalk Preservation Trust	11/9/2016
Norwalk Chamber of Commerce	11/15/2016
Western Connecticut Council of Governments	11/16/2016



Route 7-15 Norwalk

<u>Activity Outreach Activities as of 1/31/2022</u>	<u>Date</u>
Town of Wilton	11/21/2016
Merritt 7/Marcus Properties	11/21/2016
Norwalk First Taxing District	12/21/2016
Creeping Hemlock Neighborhood	12/7/2016
Norwalk Transit District	12/8/2016
Merritt Parkway Conservancy	12/12/2016
Building and Land Technology (BLT)	1/11/2017
Norwalk River Watershed	1/11/2017
Norwalk Association of Silvermine Homeowners (NASH)	1/30/2017
Meeting with local Historic Groups	2/15/2017
Project Advisory Committee (PAC) #1 Meeting- Introduction to the Project	3/27/2017
Marcus Partners/Merritt 7 Meeting	4/6/2017
Empire State Realty Trust, Inc.	5/3/2017



Route 7-15 Norwalk

<u>Activity Outreach Activities as of 1/31/2022</u>	<u>Date</u>
PAC #2 Meeting - Purpose and Need Discussion and Introduction of Traffic Conditions	5/23/2017
Norwalk River Valley Rail and Bike Group	7/25/2017
Purpose and Need PAC Subcommittee	9/12/2017
Meeting with local Historic Groups (Section 106 Consultation)	9/15/2017
PAC #3 Meeting - Review of Project Alternatives and Upcoming Public Scoping Meeting	9/19/2017
Public Scoping Meeting	10/17/2017
Agency Scoping Meeting	2/28/2018
WestCOG	6/29/2018
PAC #4 Meeting - Review Needs and Deficiency Report and Review Revised Purpose and Need Statement	9/17/2018
PAC #4/MP Landscape Workshop	9/17/2018
PAC #5 Meeting - Alternatives Assessment Screening Overview/Approach (Level 1 and Level 2 Explained)	11/14/2018
Town of Wilton	11/30/2018



Route 7-15 Norwalk

<u>Activity Outreach Activities as of 1/31/2022</u>	<u>Date</u>
PAC #6 Meeting - Level 1 Alternatives Screening	4/30/2019
Section 106 Consulting Parties Meeting	5/7/2019
Merritt Parkway Conservancy Board	6/20/2019
PAC #7 Meeting - Level 2 Alternatives Screening	6/20/2019
PAC #8 Meeting – Complete Level 2 Alternatives Screening and Selection of Alternatives for Assessment in the EA/EIE	7/11/2019
Public Information Meeting	10/23/2019
PAC Landscape Subcommittee meeting	11/21/2019
PAC Landscape Subcommittee meeting	12/16/2020
Section 106 Consulting Parties Meeting	1/15/2021
Question & Answer Session Meeting	11/30/2021
Question & Answer Session Meeting	12/1/2021



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N2
CEPA Public Scoping**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration



The following table is a list of meetings conducted by CTDOT with the public and stakeholders during the 7/15 Norwalk as of June 2020.

Table 1 Public Involvement Meetings with Agencies/Stakeholders

Name of Agency/Stakeholder Group	Meeting Date
City of Norwalk	6/1/2016
Town of Wilton	6/7/2016
Merritt Parkway Advisory Committee	7/5/2016
Merritt Parkway Conservancy (MPC)	7/29/2016
Western Connecticut Council of Governments (WestCOG)	8/15/2016
Norwalk Association of Silvermine Homeowners (NASH)	10/17/2016
Norwalk Bike/Walk Commission	11/7/2016
City of Norwalk Officials	11/9/2016
Norwalk River Valley Trail (NRVT)	11/9/2016
Norwalk Preservation Trust	11/9/2016
Norwalk Chamber of Commerce	11/15/2016
Western Connecticut Council of Governments	11/16/2016
Town of Wilton	11/21/2016
Merritt 7/Marcus Properties	11/21/2016
Norwalk First Taxing District	12/21/2016
Creeping Hemlock Neighborhood	12/7/2016
Norwalk Transit District	12/8/2016
Merritt Parkway Conservancy	12/12/2016
Building and Land Technology (BLT)	1/11/2017
Norwalk River Watershed	1/11/2017
Norwalk Association of Silvermine Homeowners (NASH)	1/30/2017
Meeting with local Historic Groups	2/15/2017
Project Advisory Committee (PAC) #1 Meeting- Introduction to the Project	3/27/2017
Marcus Partners/Merritt 7 Meeting	4/6/2017
Empire State Realty Trust, Inc.	5/3/2017
PAC #2 Meeting - Purpose and Need Discussion and Introduction of Traffic Conditions	5/23/2017
Norwalk River Valley Rail and Bike Group	7/25/2017
Purpose and Need PAC Subcommittee	9/12/2017
Meeting with local Historic Groups (Section 106 Consultation) (CT Historical Trust, Norwalk Historical Commission, Norwalk Preservation Trust, and Merritt Parkway Conservancy)	9/15/2017
PAC #3 Meeting - Review of Project Alternatives and Upcoming Public Scoping Meeting	9/19/2017
Public Scoping Meeting	10/17/2017



Name of Agency/Stakeholder Group	Meeting Date
Agency Scoping Meeting	2/28/2018
WestCOG	6/29/2018
PAC #4 Meeting - Review Needs and Deficiency Report and Review Revised Purpose and Need Statement	9/17/2018
PAC Purpose & Need Subcommittee Meeting	9/17/2018
PAC #4 Meeting- Purpose& Need and Project Update	9/17/2018
Public Landscape Workshop Meeting	9/17/2018
PAC #5 Meeting - Alternatives Assessment Screening Overview/ Approach (Level 1 and Level 2 Explained)	11/14/2018
Town of Wilton	11/30/2018
PAC #6 Meeting - Level 1 Alternatives Screening	4/30/2019
Section 106 Consulting Parties Meeting	5/7/2019
Merritt Parkway Conservancy Board	6/20/2019
PAC #7 Meeting - Level 2 Alternatives Screening	6/20/2019
PAC #8 Meeting – Complete Level 2 Alternatives Screening and Selection of Alternatives for Assessment in the EA/EIE	7/11/2019
Public Information Meeting	10/23/2019

CEPA Scoping Notice Circulation

As part of the CEPA process, the following locations and mediums were utilized to promote the Scoping Period and Public Information Meeting, in addition to being noticed in Connecticut's Environmental Monitor:

- Norwalk Hour- Display ad published on October 3rd and October 10, 2017
- Stamford Advocate- Display ad published on October 3rd and October 10, 2017
- Norwalk's local television network (Channel 12) - advertisements for two weeks beginning September 28, 2017
- Email blasts to project contact list – initial notification sent September 26, 2017; and an email reminder sent October 12, 2017
- Route 7/15 project website (www.7-15norwalk.com): notifications posted on September 26, 2017 and were made available through November 16, 2017, the end of the public scoping comment period.

CTDOT website (www.ct.gov/dot): a press release was issued by CTDOT on September 28, 2017.



**Routes 7/15 Interchange
State Project No. 102-358**

CEPA Public Scoping Appendix

For the CEPA Public Scoping Report, please see the following link:

[Link to report on Website](#)



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N3
Public Agency Consultation**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration

Agency Consultation Table of Contents

1. Agency Consultation Letter to Norwalk First District Water Department; from Stantec, January 2, 2017
2. Agency Consultation Letter to Norwalk Planning and Zoning Commission; from Stantec, January 2, 2017
3. Agency Consultation Letter to WestCOG; from Stantec, January 2, 2017
4. Agency Consultation Letter to Wilton Planning and Land Use Management; from Stantec, January 2, 2017
5. Agency Consultation Letter to U.S. ACOE; from CTDOT, April 13, 2017
6. Email correspondence to U.S. ACOE, U.S. EPA, U.S. FWS, FTA, CT DEEP, CT SHPO, and CT DPH; responding to January 2, 2017 Agency Consultation Letter*, from Stantec, July 5, 2017
7. Email correspondence from CT DEEP; responding to January 2, 2017 Agency Consultation Letter*, from Stantec, July 6, 2017
8. Email correspondence from U.S. EPA; responding to January 2, 2017 Agency Consultation Letter*, from Stantec, July 6, 2017
9. CTDOT, CT DEEP, U.S. ACOE Interagency Coordination Meeting, Project Meeting Notes for Project 102-358; from CTDOT, December 21, 2017
10. Virtual (Microsoft Teams) Interagency Meeting 7** Meeting Minutes (CTDOT, CT DEEP, U.S. EPA, U.S. ACOE, Stantec), from Stantec, May 11, 2021
11. Interagency Resources Field Walk Meeting Minutes (CTDOT, CT DEEP, U.S. EPA, Stantec), from Stantec, May 13, 2021
12. U.S.C.G Letter to CTDOT re: Coast Guard permit / exemption requirements; from U.S.C.G, May 19, 2021

Notes:

- * Although the original Agency Consultation Letter is not included in this correspondence, the letter is identical to the letters provided in Items 1-4 of this Agency Consultation Appendix.
- ** Interagency Meeting 7 represents the 7th Agency meeting. In addition to environmental agencies, other meetings have been held with local municipalities (e.g., Norwalk, Wilton) as well as MPOs (WestCOG). Please refer to the EA-EIE for a complete summary of all meetings held throughout the course of the Project.

Note: Page numbers and links to TOC item titles will be provided in Final EA-EIE document.

Agency Consultation Letter – Norwalk First
District Water Department
January 2, 2017



Stantec Consulting Services Inc.
55 Church Street Suite 601, New Haven CT 06510

January 2, 2017

Ms. Lauren Mappa
First District Water Department
12 New Canaan Avenue
Norwalk, CT 06851

Reference: Proposed Route 7/Merritt Parkway Interchange Improvements

Dear Lauren,

Pursuant to our meeting on December 21, 2016, the Connecticut Department of Transportation (CTDOT) is proposing to construct improvements (Project) at the Route 7 and Merritt Parkway interchange in the City of Norwalk, Connecticut. The principal elements of the Project consist of new access ramps designed to provide a full directional interchange with direct access between Route 7 and the Merritt Parkway. The Project will improve traffic operations and safety at the Merritt Parkway and Main Avenue interchange and along Main Avenue and Glover Avenue in the vicinity of the interchange.

As the interchange plan is progressed, coordination with public service providers is recognized as an important project component. The First District Water Department will have the opportunity to review the plan and provide specific comments at a later design stage.

At this time, we are requesting the following comments/maps that the First District Water Department may have regarding:

- any water transmission issues currently in the project vicinity;
- need for coordination with First District Water during construction;
- potential positive or negative impacts on First District Water's operations related to the proposed improvements;
- record mapping of the First District Water facilities (including water main locations, well locations, and pump station locations) within the project area. (Pursuant to our meeting, you can transmit the mapping you indicated you had directly to Andy Fesenmeyer at CTDOT.)

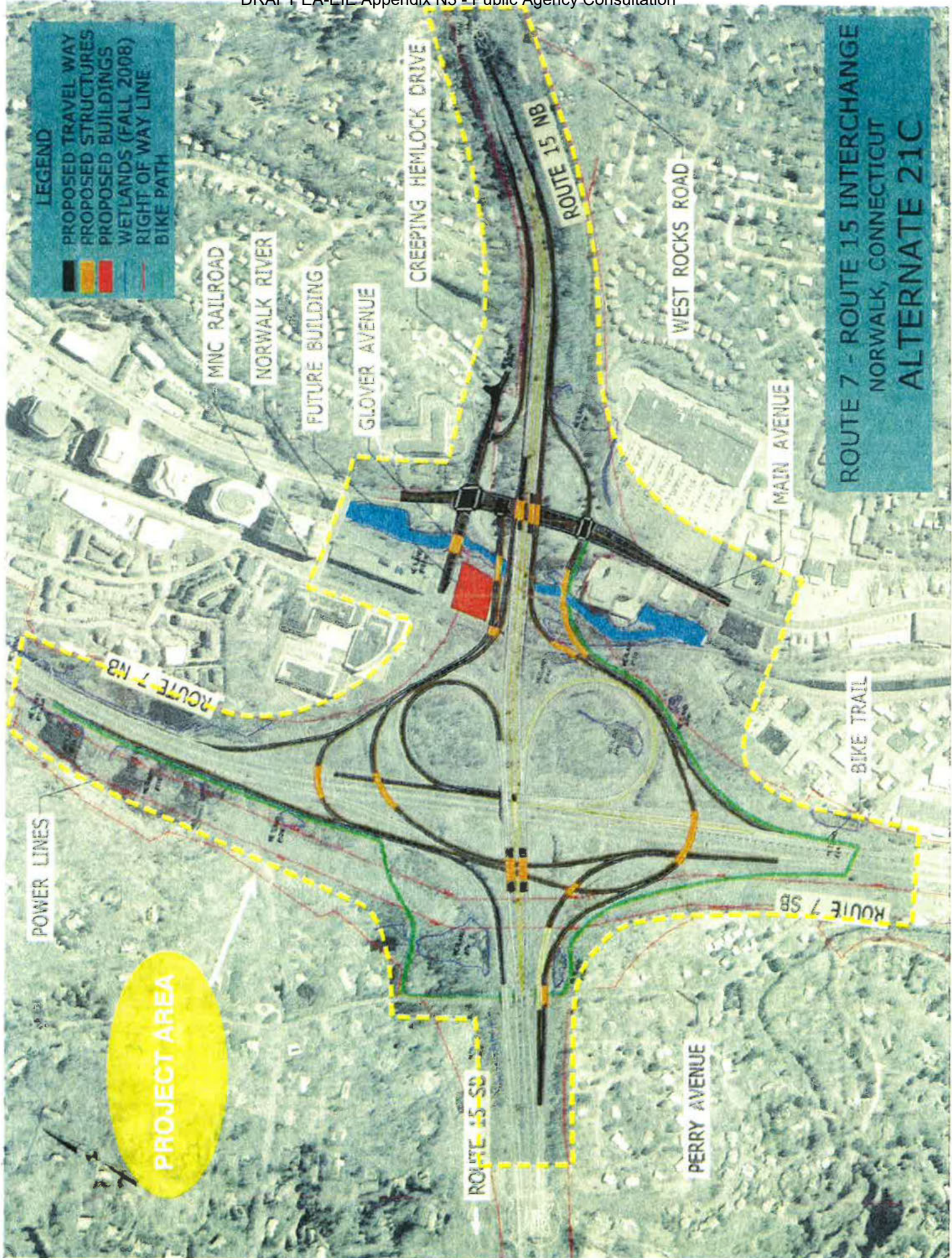
Please feel free to call me at (203) 495-1645 with any questions.

Regards,

STANTEC CONSULTING SERVICES INC.

A handwritten signature in blue ink, appearing to read "John F. Eberle", written over the printed name and title.

John F. Eberle, PE, LEED AP ND
Principal



Agency Consultation Letter – Norwalk Planning and Zoning Commission

January 2, 2017



Stantec Consulting Services Inc.
55 Church Street Suite 601, New Haven CT 06510

January 2, 2017

Steve Kleppin
Planning and Zoning Director
City of Norwalk
125 East Avenue
Room 223
Norwalk, CT 06856

Reference: Proposed Route 7/Merritt Parkway Interchange Improvements

Dear Mr. Kleppin,

The Connecticut Department of Transportation (CTDOT) is proposing to construct improvements (Project) at the Route 7 and Merritt Parkway interchange in the City of Norwalk, Connecticut. The principal elements of the Project consist of new access ramps designed to provide a full directional interchange with direct access between Route 7 and the Merritt Parkway. The Project will improve traffic operations and safety at the Merritt Parkway and Main Avenue interchange and along Main Avenue and Glover Avenue in the vicinity of the interchange. (See attached plan.)

As the interchange plan is progressed, consistency with local development planning and zoning is recognized as an important project component. The Norwalk Planning and Zoning Commissions will have the opportunity to review the plan and provide specific comments at a later design stage.

At this time, we are requesting any comments the Planning and Zoning Department may have regarding:

- the functionality of the existing interchange;
- current plans for bicycle and pedestrian trails in the vicinity of the interchange;
- any plans for other large projects with the potential to affect traffic volumes or patterns with respect to the Route 7/Merritt Parkway intersection; and
- Consistency of the proposed improvements with planning and zoning goals of the City of Norwalk.

We also request:

- Clarification from the Zoning Commission as to whether the provisions of the Aquifer Protection Act, including limitations on the use of portable fuel tanks and chemical containers, would apply to project construction activities located in the Kellog-Deering aquifer protection area.



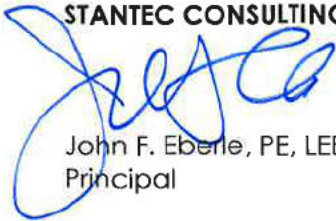
January 2, 2017
Steve Kleppin
Page 2 of 2

Reference: Proposed Route 7/Merritt Parkway Interchange Improvements

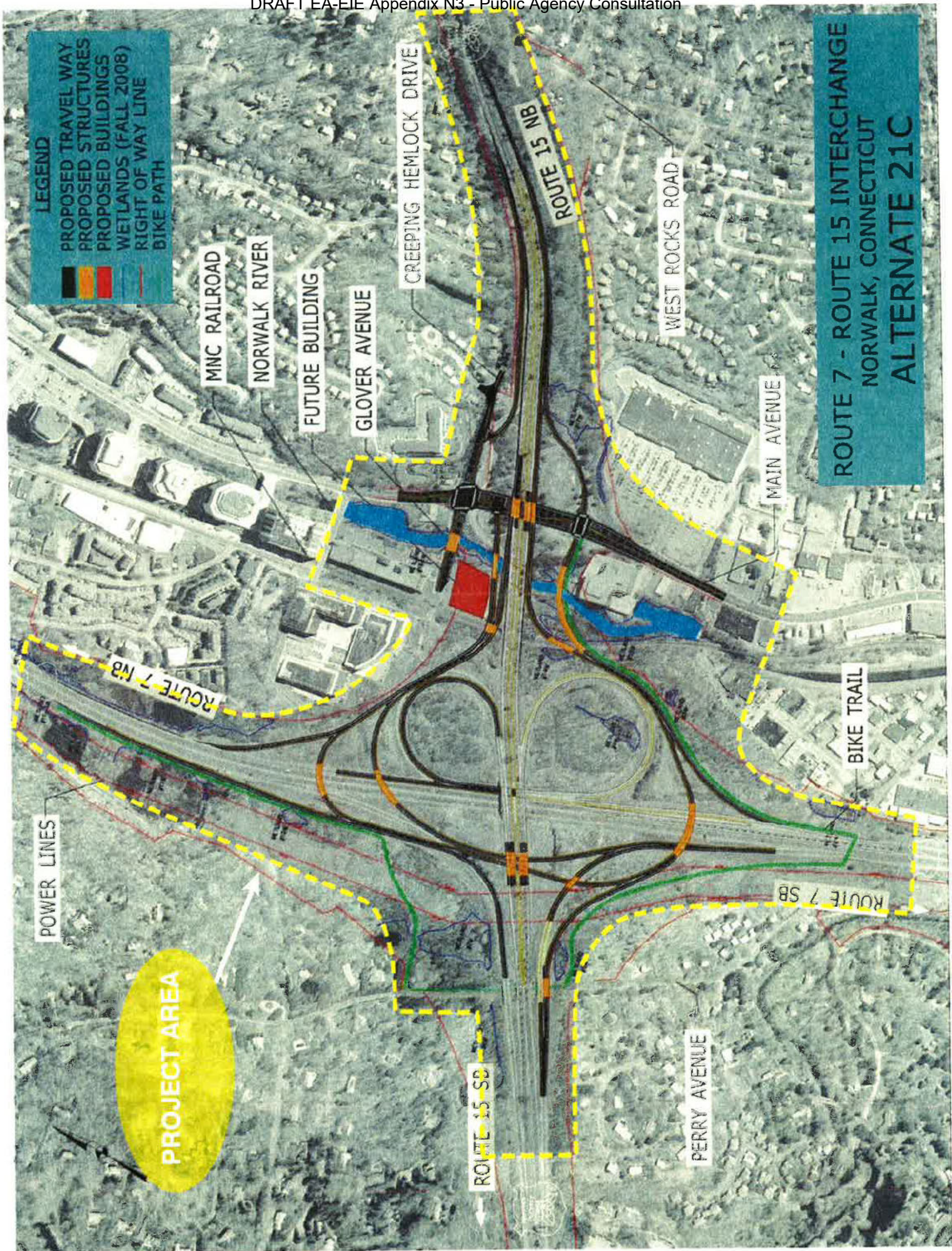
Please feel free to call me at (203) 495-1645 with any questions. We are available at any time to discuss the project.

Regards,

STANTEC CONSULTING SERVICES INC.



John F. Ebene, PE, LEED AP ND
Principal



Agency Consultation Letter – WestCOG

January 2, 2017



Stantec Consulting Services Inc.
55 Church Street Suite 601, New Haven CT 06510

January 2, 2017

Mr. Francis Pickering
Executive Director
Western Connecticut Council of Governments
One Riverside Road
Sandy Hook, CT 06482

Reference: Proposed Route 7/Merritt Parkway Interchange Improvements

Dear Mr. Pickering,

As we recently informed you and your staff, the Connecticut Department of Transportation (CTDOT) is proposing to construct improvements (Project) at the Route 7 and Merritt Parkway interchange in the City of Norwalk, Connecticut. The principal elements of the Project consist of new access ramps designed to provide a full directional interchange with direct access between Route 7 and the Merritt Parkway. The Project will improve traffic operations and safety at the Merritt Parkway and Main Avenue interchange and along Main Avenue and Glover Avenue in the vicinity of the interchange. (See attached Project area.)

As the interchange plan is progressed, consistency with regional conservation and development planning is recognized as an important project component. WestCOG will have the opportunity to review the plan and provide specific comments at a later design stage.

At this time, we are requesting any comments WestCOG may have regarding:

- the functionality of the existing interchange;
- any plans for other large projects with the potential to affect traffic volumes or patterns with respect to the Route 7/Merritt Parkway intersection; and
- consistency of the proposed improvements with regional planning goals.


We would also like to request a copy of the following WestCOG document:

- Appendix C (Costs of Congestion by Travel Period and Roadway) from the report *Measuring the Costs of Congestion: SWRPA Region and Westchester County Sub-Area, March 2010*.

Please feel free to call me at (203) 495-1645 with any questions. I am available at any time to discuss the project.

Regards,

STANTEC CONSULTING SERVICES INC.


John F. Eberle, PE, LEED AP ND
Principal

Design with community in mind



Agency Consultation Letter – Wilton Planning and Land Use Management

January 2, 2017



Stantec Consulting Services Inc.
55 Church Street Suite 601, New Haven CT 06510

January 2, 2017

Robert Nerney, AICP
Director of Planning and Land Use Management
Wilton Town Hall
238 Danbury Road
Wilton, CT 06897

Reference: Proposed Route 7/Merritt Parkway Interchange Improvements

Dear Mr. Nerney,

As we discussed at our past project introductions, the Connecticut Department of Transportation (CTDOT) is proposing to construct improvements (Project) at the Route 7 and Merritt Parkway interchange in the City of Norwalk, Connecticut. The principal elements of the Project consist of new access ramps designed to provide a full directional interchange with direct access between Route 7 and the Merritt Parkway. The Project will improve traffic operations and safety at the Merritt Parkway and Main Avenue interchange and along Main Avenue and Glover Avenue in the vicinity of the interchange. (See attached Project area.)

As the interchange plan is progressed, consistency with local development planning and zoning is recognized as an important project component. The Wilton Planning and Zoning Commission will have the opportunity to review the plan and provide specific comments at a later design stage.

At this time, we are requesting any comments the Planning and Zoning Department may have regarding:

- the functionality of the existing interchange;
- any plans for other large projects with the potential to affect traffic volumes or patterns with respect to the Route 7/Merritt Parkway intersection; and
- consistency of the proposed improvements with planning and zoning goals of the Town of Wilton.

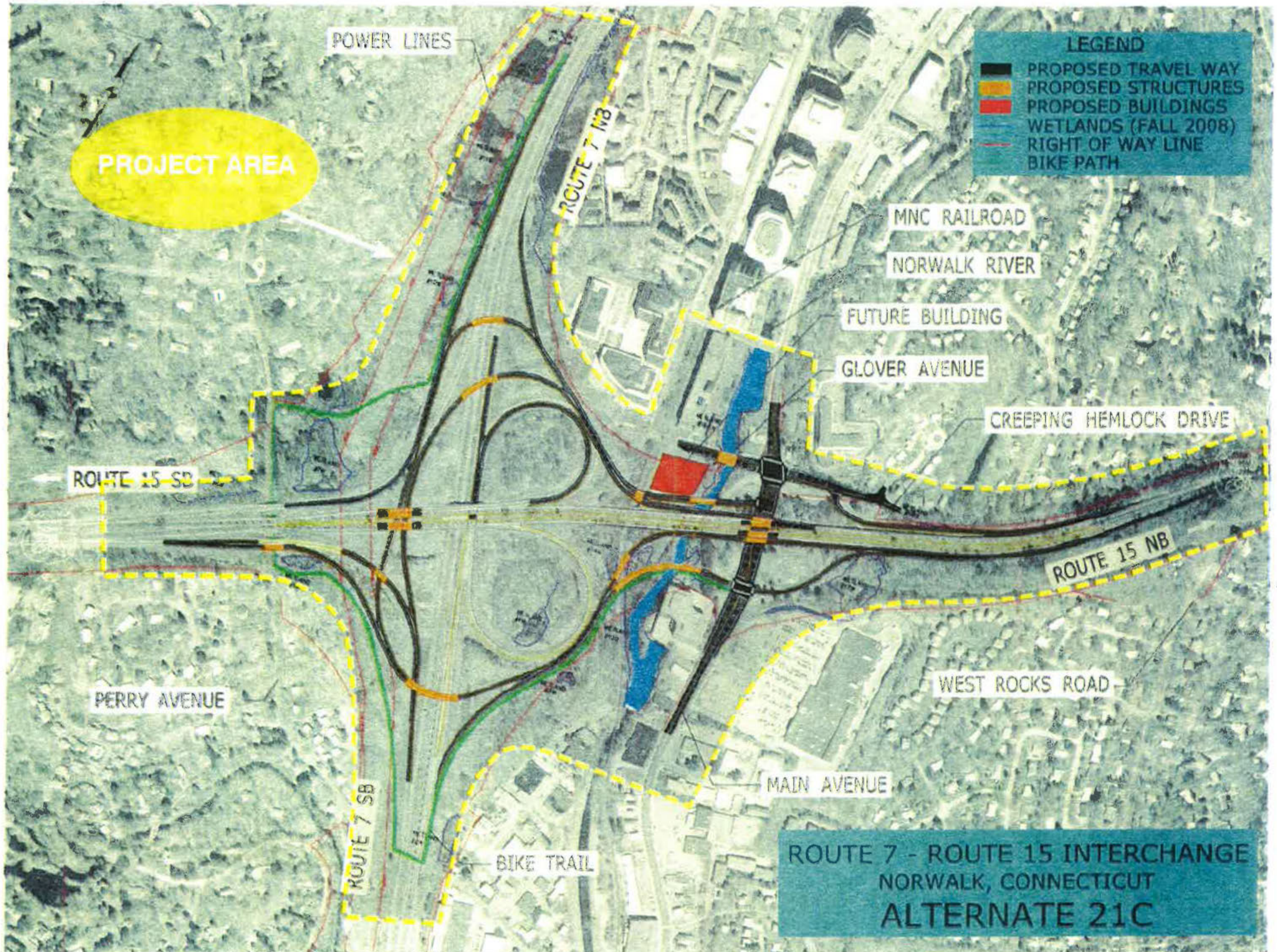
Please feel free to call me at (203) 495-1645 with any questions. I am available at any time to discuss the project.

Regards,

STANTEC CONSULTING SERVICES INC.

A handwritten signature in blue ink, appearing to read "John F. Eberle", written over the printed name and title.

John F. Eberle, PE, LEED AP ND
Principal

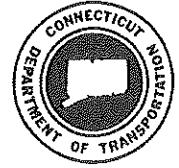


Agency Consultation Letter – U.S. ACOE

April 13, 2017



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546
April 13, 2017
Phone:

Ms. Susan Lee
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

Dear Ms. Lee,

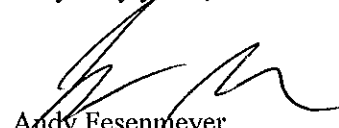
RE: Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (Department) are initiating the Route 7/Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the city of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA)/Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA/CEPA.

Your agency has been identified as one that may have an interest in this project because of the resources located in the project area. Accordingly, the Department is sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. You are also encouraged to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held according to the requirements of CEPA. The scoping meeting notice will be published in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

If you have any questions or comments regarding the attached project information, the Department encourages you or your designee to either attend the future CEPA project scoping meeting or alternatively contact Andy Fesenmeyer, Department's Project Manager, at Andy.Fesenmeyer@ct.gov or (860) 594-3228.

Very truly yours,


Andy Fesenmeyer
Transportation Supervising Engineer
Bureau of Engineer and Construction

cc: Christopher Hansen, Federal Highway Administration

Jennifer Sweeney/js

bcc: Kevin Carifa

Mark Carlino

Scott Spiel

Richard Armstrong – Andy Fesenmeyer-Jennifer Sweeney

Thomas Doyle

BR

S:\Condes\SR\SWEENEY\102-358\ NEPA_CEPA Coordination Letters_PN_032717_Draft

The above letter was sent to the following:

Ms. Susan Lee

U.S. Army Corps of Engineers

New England District

696 Virginia Road

Concord, MA 01742

Ms. Kristina Newman-Scott

Director of Culture

Connecticut Department of Economic and
Community Development

One Constitution Plaza, Second Floor
Hartford, CT 06103

Mr. Tim Timmermann

Associate Director

U.S. EPA Region 1

John F. Kennedy Bldg.

Boston, MA 02203-0001

Mr. John Warner

Assistant Supervisor, Federal Activities

United States Fish & Wildlife Service New

England Field Office

70 Commercial Street Suite 300

Concord, New Hampshire 03301

Ms. Mary Beth Mello

FTA Region 1 Administrator

Kendall Square

55 Broadway, Suite 920

Cambridge, MA 02142-1093

Mr. Frederick Riese

Senior Environmental Analyst

Connecticut Department of Energy and
Environmental Protection

Office of Environmental Review

79 Elm Street

Hartford, CT 06106-5127

Ms. Lori Mathieu

Public Health Section Chief

CT Department of Public Health

Drinking Water Section

410 Capitol Avenue, MS#12DWS

P.O. Box 340308

Hartford, CT 06134-0308

The Honorable Harry W. Rilling

Mayor

City of Norwalk

125 East Avenue

P.O. Box 5125

Norwalk, CT 06856-5125

Mr. Francis Pickering

Executive Director

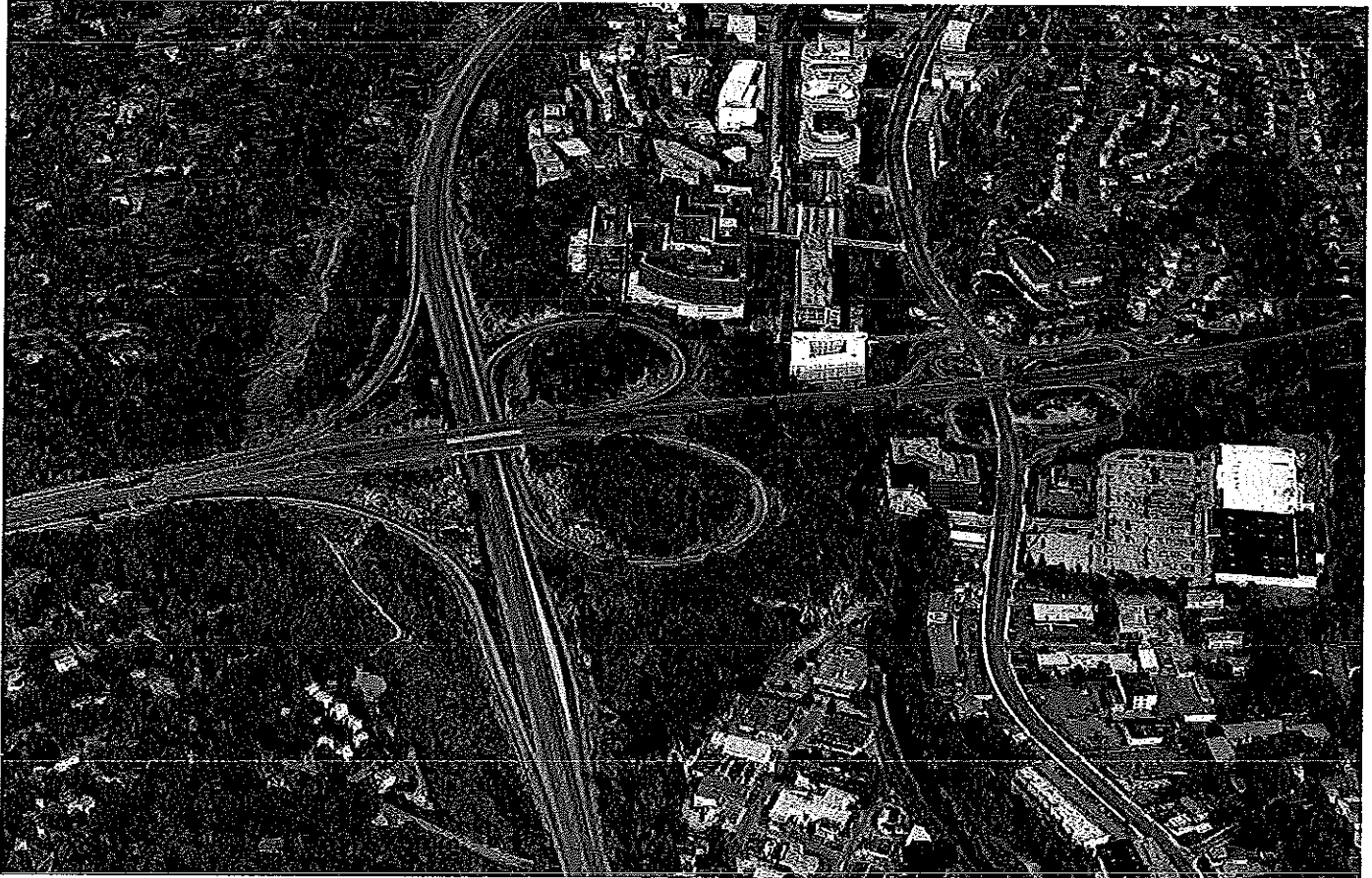
Western Connecticut Council of Governments

1 Riverside Drive

Sandy Hook, CT 06482

**ROUTE 7/15 INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

DRAFT PURPOSE AND NEED STATEMENT



03/01/17

DRAFT

ROUTE 7/15 NORWALK PROJECT DRAFT PURPOSE AND NEED STATEMENT

PROJECT LOCATION

The proposed project is located in the northern portion of the City of Norwalk and encompasses the interchange of the Route 15 (Merritt Parkway) and Route 7; the interchange of the Merritt Parkway with Main Avenue; Main Avenue (SR 719); and Glover Avenue/Creeping Hemlock Drive in the vicinity of Main Avenue. The project area extends along the Merritt Parkway from approximately 0.5 miles west of Route 7 to approximately 0.5 miles east of Main Avenue and along Route 7 from approximately 0.5 miles south of the Merritt Parkway to approximately 0.5 miles north of the Merritt Parkway.

The project area is illustrated in Figure No. 1.

EXISTING TRANSPORTATION NETWORK

Route 7

Regionally, Route 7 serves as an important north-south transportation corridor in western Connecticut, connecting Interstate 84 (I-84) in Danbury and Interstate 95 (I-95) in Norwalk. Throughout the corridor, Route 7 provides essential service to residential communities and businesses in the towns of Ridgefield, Redding and Wilton as well as the cities of Danbury and Norwalk. Within and abutting the project area, Route 7 is a four lane limited access expressway between I-95 and Grist Mill Road in Norwalk, where it intersects with the Route 7 arterial roadway to the north. The roadway that previously functioned as Route 7 between I-95 and Grist Mill Road prior to the completion of the Route 7 expressway is now called Main Avenue.

Merritt Parkway

The Merritt Parkway is approximately 37 miles long. It connects the Hutchinson River Parkway at the New York State line in Greenwich to the Wilbur Cross Parkway at the Housatonic River in Stratford. The Parkway has two travel lanes in each direction and is restricted to non-commercial use. It was listed in the National Register of Historic Places for its significance in the areas of landscape design, transportation and architecture. It was also designated as a National Scenic Byway and State Scenic Road. Therefore, the overall character of the Merritt Parkway (its form, geometry and appearance) is an intrinsic element to its significance. In the project area, the Merritt Parkway carries traffic over Perry Avenue, Route 7 and Main Avenue as well as the Norwalk River and Metro North Railroad. This portion of the Parkway includes four historic bridges that are contributing resources to the Merritt Parkway National Register listing. They are the Perry Avenue Overpass (CTDOT Bridge No. 00719), the Main Avenue Bridge (Nos. 00530A and 00530B), the Metro North Railroad Overpass (No. 00720) and the Norwalk River Overpass (No. 00721).

03/01/17

DRAFT

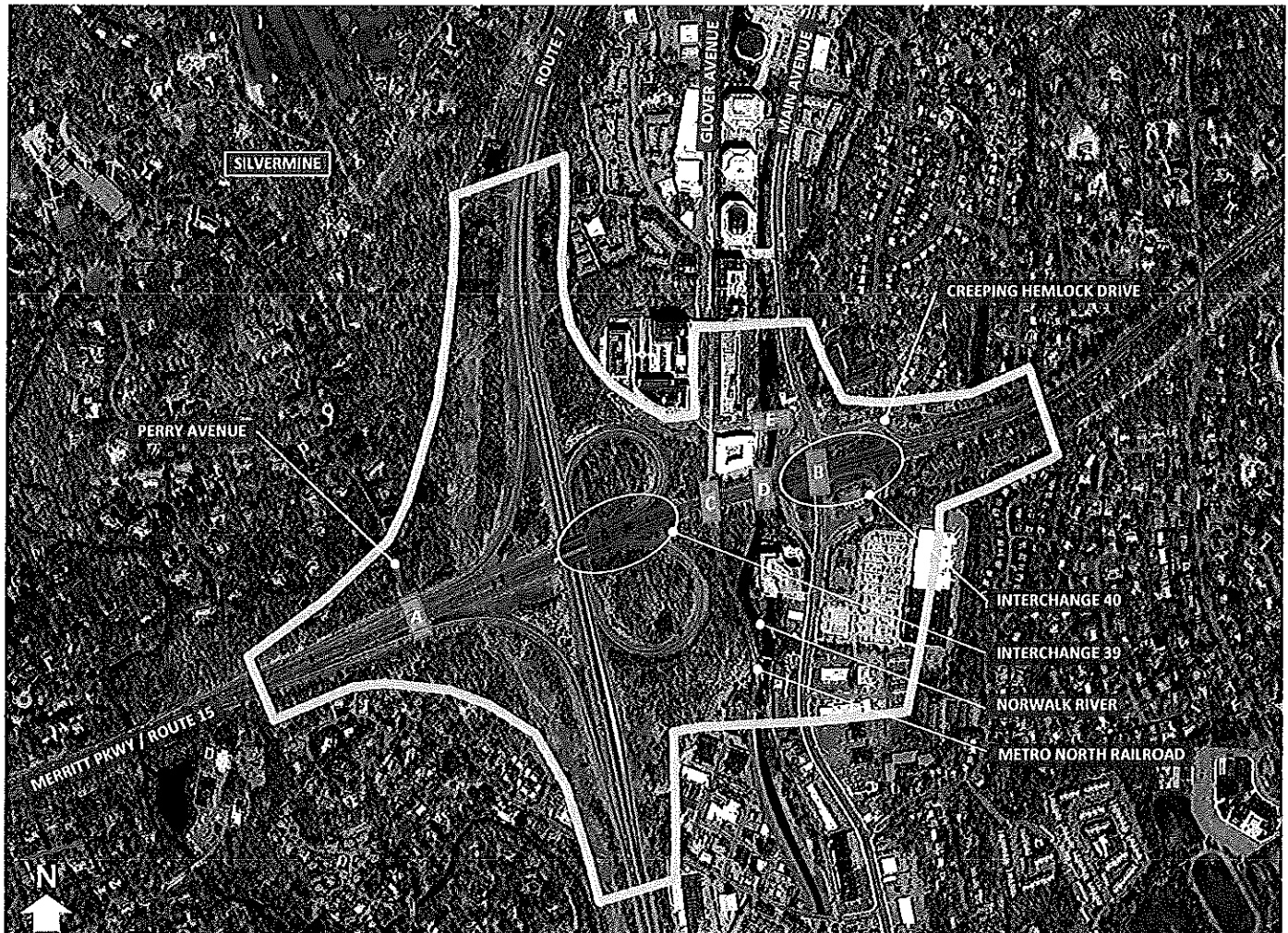







Figure No. 1: Project Area

Historic Bridges

-  Perry Avenue Overpass
-  Main Avenue Bridge
-  MNRR Overpass
-  Norwalk River Overpass
-  Glover Avenue over Norwalk River

03/01/17

DRAFT

Existing Interchanges

Interchange No. 39 provides partial connections between Route 7 and the Merritt Parkway. Connections are provided from Route 7 northbound to the Merritt Parkway southbound, from Route 7 southbound to the Merritt Parkway southbound, from the Merritt Parkway northbound to Route 7 northbound and from the Merritt Parkway northbound to Route 7 southbound. Connections between Route 7 and the Merritt Parkway to and from the north are not provided. Due to the missing connections, the Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road. Merritt Parkway northbound motorists must use the Merritt Parkway /Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue. Similarly, motorists on Route 7 have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

Interchange No. 40, a second nearby interchange provides connections in all directions between the Merritt Parkway and Main Avenue. This interchange is located approximately 1,500 feet east of the Route 7 and Merritt Parkway interchange and the Norwalk River.

Main Avenue

Main Avenue is a four lane urban minor arterial which parallels Route 7 and the Norwalk River and extends north and south of the Merritt Parkway/Route 7 interchange. Connections between Route 7 and Main Avenue do not exist in the vicinity of Interchange No. 39 or Interchange No. 40.

Glover Avenue

The Glover Avenue Bridge (No. 04155) which carries Glover Avenue over the Norwalk River is independently eligible for listing in the National Register of Historic Places. Glover Avenue, also connects with Creeping Hemlock Drive at the signalized intersection with Main Avenue. Creeping Hemlock Drive serves the residential community east of Main Avenue.

PROJECT PURPOSE

The purpose of the project is to improve system linkage between Route 7 and the Merritt Parkway at Interchange No. 39; improve the mobility for all users at the Merritt Parkway's Main Avenue and Route 7 Interchanges (No. 39 & No. 40); and improve safety in the vicinity of these interchanges.

PROJECT NEEDS

CTDOT and FHWA are undertaking the project to improve the efficiency and/or reduce the deficiencies of the existing Interchanges and streets in the vicinity of the interchanges.

System Linkage

The existing Merritt Parkway and Route 7 Interchange configuration does not provide all connections between Route 7 and the Merritt Parkway. As a result, approximately 250 and 125 vehicles use the Main Avenue corridor to connect between Route 7 and the Merritt Parkway during the weekday morning and weekday evening peak hours, respectively. This is approximately 5 to 15 percent of the traffic currently using the Main Avenue corridor between CT 123 and CT 15 during either peak hour. These additional vehicles contribute to peak hour

03/01/17

DRAFT

congestion along the Main Avenue corridor (LOS D/E). Providing the missing connections would allow access in all directions, eliminate the need for motorists to use Main Avenue to connect between Route 7 and the Merritt Parkway, and improve the efficiency of motorists connecting between the roadways.

Safety

The existing Main Avenue and Merritt Parkway Interchange ramps have inadequate acceleration and deceleration lanes, steep grades, sharp curves, and limited sight distance that contribute to a high number of crashes. Over a three-year period, (2012-2014) a total of 190 crashes have occurred along Main Avenue or on the Merritt Parkway in the vicinity of Interchange No. 40. Of those, 28 crashes have occurred on Main Avenue and 162 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange. Over a three-year period, (2012-2014) a total of 120 crashes have occurred along Route 7 or on the Merritt Parkway in the vicinity of Interchange No. 39. Of those, 29 crashes have occurred on Route 7 and 91 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange. The segment of the Merritt Parkway in the vicinity of the interchange with Main Avenue has been on CTDOT's Suggested List of Surveillance Study Sites (SLOSSS) for the past decade. Similarly, the segment of the Main Avenue corridor in the vicinity of the interchange with the Merritt Parkway (Glover Avenue) has been on CTDOT's SLOSSS list for the past five years. The SLOSSS list is an annual listing of exceptionally high accident locations.

Mobility

Providing vehicular connections between Main Avenue and Route 7 would improve mobility for some users of Main Avenue and Route 7. Up to approximately 250 peak hour vehicles accessing the roadways from locations north or south of the project area either originate from or are connecting between portions of Route 7 and Main Avenue in the vicinity of the Merritt Parkway interchanges. Providing for pedestrian and/or bicycle access would allow connections between neighborhoods and land uses for pedestrians and bicyclists that currently do not exist.

Congestion

Main Avenue and Glover Avenue in the vicinity of Interchange No. 40, are currently experiencing heavy congestion and delays during peak hours. The intersection of Main Avenue at Glover Avenue / Creeping Hemlock Drive operates at LOS F and LOS E during both the weekday morning and weekday evening peak hours. Furthermore, certain ramps at the Merritt Parkway interchange with Main Avenue operate at LOS E or F. Improvements at the interchange and/or Main Avenue would reduce congestion and reduce delays at those intersections with the existing traffic volumes. With long term traffic growth, it is possible that congestion could continue to occur but the impacts of that congestion would be less with the Interchange/ Main Avenue improvements than it would be if the improvements are not made.

PROJECT GOALS AND OBJECTIVES

Goals and objectives that provide other factors that would be considered in the alternative analyses screening process include:

03/01/17

DRAFT

- A. Long Term Serviceability of the Affected Roadways within the Project Area:
 - 1. Creating opportunities for improved connections to existing and reasonably foreseeable future modes of transportation within the project area. (i.e. surface transit, Metro-North Railroad, bicycles/pedestrians, etc.)
 - 2. Coordinating with the City of Norwalk toward a workable solution that is compatible with city and regional initiatives.
- B. Maximize the Public Investment with the Project:
 - 1. Utilizing cost-effective solutions that maximize capital investment over the lifespan of the project.
 - 2. Reducing short term maintenance costs of the affected bridges and roadways.
 - 3. Minimizing the impact of construction on the traveling public and local communities.
 - 4. Implementing sustainable practices.
- C. Integrate the Project Roadways with the Environment and Neighborhood context:
 - 1. Incorporating design elements that are not only consistent with the *'Merritt Parkway Guidelines for General Maintenance and Transportation Improvements'* for maintaining and improving the Parkway's resource characteristics within the confines of the Merritt Parkway Scenic Byway Corridor, but identify opportunities for design elements that are sensitive to the historic character of the Parkway corridor and integrity, and where feasible, elements of the original design intent
 - 2. Incorporating features and details that would improve the aesthetic qualities of the project roadways as viewed from adjacent areas and sustain a contiguous and recognizable character of the scenic Parkway.
- D. Provide for Reasonably Foreseeable Future Pedestrian and Bicycle Access Through the Project Area:
 - 1. Provide pedestrian and bicycle accommodations for the future extension of the pedestrian access and bike trails through the project area.

Email correspondence to U.S. ACOE, U.S. EPA,
U.S. FWS, FTA, CT DEEP, CT SHPO, and CT DPH
(responding to January 2, 2017 Agency
Consultation Letter)

July 5, 2017

STATE PROJECT NO. 102-358 - Route 7/Route 15 Interchange
DRAFT EA-EIE Appendix N3 - Public Agency Consultation

From: [Eberle, John](#)
To: susan.k.lee@usace.army.mil; timmermann.timothy@epa.gov; John_Warner@fws.gov; mary.mello@dot.gov; frederick.riese@ct.gov; kristina.newmanscott@ct.gov; Lori.Mathieu@ct.gov
Cc: andy.fesenmeyer@ct.gov; jennifer.sweeney@ct.gov
Subject: Route 7-15 Interchange, Norwalk, CT State Project 102-358
Date: Wednesday, July 5, 2017 4:34:33 PM
Attachments: [Agency Notifications Letters .pdf](#)

All

I am writing as a follow-up to agency notification letters for the identified project (attached) that were sent out in April of this year. We are currently planning on a scoping meeting to be held in fall (likely October) and are trying to gauge interest, comments etc for the information provided (general project concerns or comments on purpose and need statement provided.)

We have not received any response to date from your agency and in an effort to elicit as much feedback as possible in advance of the scoping meeting, we are trying to confirm that there are no comments at this time.

If you do have any comments on the project or the Purpose and Need Statement, please do not hesitate to contact Andy Fesenmeyer, CTDOT Project Manager (contact details in letter).

Thank you.

John

John F. Eberle, PE, LEED AP ND

Principal
Stantec
55 Church Street Suite 601, New Haven CT 06510-3014
Phone: 203-495-1645 ext 7036
Fax: 203-495-1652
john.eberle@stantec.com

The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

 Please consider the environment before printing this email.

Email correspondence from CT DEEP
(responding to January 2, 2017 Agency
Consultation Letter)

July 6, 2017

From: [Eberle, John](#)
To: ["jennifer.sweeney@ct.gov"](#); ["andy.fesenmeyer@ct.gov"](#); [Armstrong, Richard B \(Richard.Armstrong@ct.gov\)](#)
Cc: [Ken Livingston \(klivingston@fhiplan.com\)](#)
Subject: FW: Route 7-15 Interchange, Norwalk, CT State Project 102-358
Date: Thursday, July 6, 2017 10:20:42 AM

fyi

From: Riese, Frederick [mailto:Frederick.Riese@ct.gov]
Sent: Thursday, July 06, 2017 10:16 AM
To: Eberle, John <John.Eberle@stantec.com>
Subject: RE: Route 7-15 Interchange, Norwalk, CT State Project 102-358

Dear Mr. Eberle,
Thank you for this notification. The Connecticut Department of Energy and Environmental Protection looks forward to participating in the review of this project. We will be attending the scoping meeting this fall. Please continue to use me as the DEEP contact for this study. We do not have any comments to offer at this time.
Fred Riese

From: Eberle, John [mailto:John.Eberle@stantec.com]
Sent: Wednesday, July 05, 2017 4:35 PM
To: susan.k.lee@usace.army.mil; timmermann.timothy@epa.gov; John_Warner@fws.gov; mary.mello@dot.gov; Riese, Frederick <Frederick.Riese@ct.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>; Mathieu, Lori <Lori.Mathieu@ct.gov>
Cc: Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Sweeney, Jennifer J. <Jennifer.Sweeney@ct.gov>
Subject: Route 7-15 Interchange, Norwalk, CT State Project 102-358

All

I am writing as a follow-up to agency notification letters for the identified project (attached) that were sent out in April of this year. We are currently planning on a scoping meeting to be held in fall (likely October) and are trying to gauge interest, comments etc for the information provided (general project concerns or comments on purpose and need statement provided.)

We have not received any response to date from your agency and in an effort to elicit as much feedback as possible in advance of the scoping meeting, we are trying to confirm that there are no comments at this time.

If you do have any comments on the project or the Purpose and Need Statement, please do not hesitate to contact Andy Fesenmeyer, CTDOT Project Manager (contact details in letter).

Thank you.

John

John F. Eberle, PE, LEED AP ND
Principal

STATE PROJECT NO. 102-358 - Route 7/Route 15 Interchange
DRAFT EA-EIE Appendix N3 - Public Agency Consultation

Stantec
55 Church Street Suite 601, New Haven CT 06510-3014
Phone: 203-495-1645 ext 7036
Fax: 203-495-1652
john.eberle@stantec.com

The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

 Please consider the environment before printing this email.

Email correspondence from U.S. EPA
(responding to January 2, 2017 Agency
Consultation Letter)

July 6, 2017

From: [Eberle, John](#)
To: ["andy.fesenmeyer@ct.gov"](#); ["jennifer.sweeney@ct.gov"](#); [Armstrong, Richard B \(Richard.Armstrong@ct.gov\)](#)
Cc: [Ken Livingston \(klivingston@fhiplan.com\)](#)
Subject: FW: Route 7-15 Interchange, Norwalk, CT State Project 102-358
Date: Thursday, July 6, 2017 9:55:58 AM

[FYI and records](#)

From: Timmermann, Timothy [mailto:Timmermann.Timothy@epa.gov]
Sent: Thursday, July 06, 2017 9:51 AM
To: Eberle, John <John.Eberle@stantec.com>; susan.k.lee@usace.army.mil; John_Warner@fws.gov; mary.mello@dot.gov; frederick.riese@ct.gov; kristina.newmanscott@ct.gov; Lori.mathieu@ct.gov
Cc: 'andy.fesenmeyer@ct.gov' <andy.fesenmeyer@ct.gov>; 'jennifer.sweeney@ct.gov' <jennifer.sweeney@ct.gov>; Margason, Nathan <Margason.Nathan@epa.gov>; Marsh, Michael <marsh.mike@epa.gov>; Walsh-Rogalski, William <Walshrogalski.William@epa.gov>; LeClair, Jacqueline <Leclair.Jackie@epa.gov>; Wintrob, Paul <Wintrob.Paul@epa.gov>; Timmermann, Timothy <Timmermann.Timothy@epa.gov>
Subject: RE: Route 7-15 Interchange, Norwalk, CT State Project 102-358

John:

Thanks for the follow-up message. Please keep us on your mailing list so that we are aware of the scoping meeting. We don't have any particular comments at this time regarding the project but we intend to participate in the scoping process and any discussions about the proposal as part of upcoming monthly CTDOT coordination meetings.

Regards,

Timothy L. Timmermann, Associate Director
Office of Environmental Review
EPA New England-Region 1
5 Post Office Square, Suite 100
Mail Code ORA 17-1
Boston, MA 02109-3912

Email: timmermann.timothy@epa.gov
Telephone: 617-918-1025
E-Fax: 617-918-0025

From: Eberle, John [mailto:John.Eberle@stantec.com]
Sent: Wednesday, July 05, 2017 4:35 PM
To: susan.k.lee@usace.army.mil; Timmermann, Timothy <Timmermann.Timothy@epa.gov>; John_Warner@fws.gov; mary.mello@dot.gov; frederick.riese@ct.gov; kristina.newmanscott@ct.gov; Lori.mathieu@ct.gov
Cc: 'andy.fesenmeyer@ct.gov' <andy.fesenmeyer@ct.gov>; 'jennifer.sweeney@ct.gov' <jennifer.sweeney@ct.gov>
Subject: Route 7-15 Interchange, Norwalk, CT State Project 102-358

All

I am writing as a follow-up to agency notification letters for the identified project (attached) that were sent out in April of this year. We are currently planning on a scoping meeting to be held in fall (likely October) and are trying to gauge interest, comments etc for the information provided (general project concerns or comments on purpose and need statement provided.)

We have not received any response to date from your agency and in an effort to elicit as much feedback as possible in advance of the scoping meeting, we are trying to confirm that there are no comments at this time.

If you do have any comments on the project or the Purpose and Need Statement, please do not hesitate to contact Andy Fesenmeyer, CTDOT Project Manager (contact details in letter).

Thank you.

John

John F. Eberle, PE, LEED AP ND

Principal

Stantec

55 Church Street Suite 601, New Haven CT 06510-3014

Phone: 203-495-1645 ext 7036

Fax: 203-495-1652

john.eberle@stantec.com

The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.



Please consider the environment before printing this email.

CTDOT, CT DEEP, U.S. ACOE Interagency
Coordination Meeting, Project Meeting Notes
for Project 102-358
December 21, 2017

DEEP /USACE/ DOT

Interagency Coordination Meeting 12/21/2017

Project Meeting Notes

[REDACTED]

102-358 Route 15/7 Interchange Improvement, Norwalk

12/21/2017 – This project was previously put on hold due to legal action in 2009. The purpose of this project is to improve system linkage, increase mobility for all modes of transportation, and improve safety in the vicinity of the interchanges. The intersections and interchanges will be redesigned using ramps with new alignments and additional traffic signals. A wetland delineation and report for this project was done in Fall 2016.

Project Impacts: 15 wetland sites and 8-10 intermittent watercourses have been identified within the site area. Wetland sites (identified as #'s 9 and 10) to the north were mitigation sites from previous DOT projects. With the anticipated removal of the dam on the Norwalk River, the project site will have river herring on site which would require a Time of Year Restriction during construction. All alternatives explored will result in FEMA 100-year floodplain impacts.

Permitting Requirements: Consultant had submitted to Coast Guard – no navigable waters, and also USACE – haven't heard back. Permitting Requirements will be determined at the conclusion of the NEPA/CEPA study.

Agency Comments: Hydraulics and Drainage Staff stated that the FEMA map for this area is out of date and inaccurate, a map revision will probably be necessary. The consultant replied that FEMA may be currently performing an analysis. DEEP Fisheries Staff stated that they plan to be removing the Flock Process Dam this summer that creates a backwater upstream to Glover Ave, and stops Blue Back Herring. Fisheries expects the water level to drop with dam removal. DOT OEP requested to be sent the plans for the dam removal. DEEP Fisheries staff mentioned, if mitigation is necessary Davis Pond Dam would benefit from a new fishway.

Subsequent to the meeting, DEEP emailed the dam removal plans to the DOT

Action Items: Continue the NEPA/CEPA study.

[REDACTED]

DEEP /USACE/ DOT

Interagency Coordination Meeting 12/21/2017

Project Meeting Notes

[REDACTED]

Virtual Interagency Meeting Minutes (CTDOT,
CT DEEP, U.S. EPA, U.S. ACOE, Stantec)
May 11, 2021



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Interagency Meeting 7

Date/Time: May 11, 2021 11:00 AM

Location: MS Teams Meeting

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Matt	Arsenault	matt.arsenault@stantec.com	Stantec Consulting Services Inc.	Yes
Andy	Davis	Andrew.H.Davis@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Jessica	Hunt	Jessica.Hunt@stantec.com	Stantec Consulting Services Inc.	Yes
Susan	Jacobson	susan.jacobson@ct.gov	CTDEEP	Yes
Nathan	Margason	margason.nathan@epa.gov	US EPA	Yes
Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	Yes
Peter	Olmstead	peter.d.olmstead@usace.army.mil	ACOE	Yes
Anasse	Ouedraogo	Anasse.Ouedraogo@ct.gov	CTDEEP	Yes
Chris	Samorajczyk	Christopher.Samorajczyk@ct.gov	CTDOT	Yes
Barbara	Wagner	barbara.wagner@stantec.com	Stantec Consulting Services Inc.	Yes
Bruce	Williams	bruce.williams@ct.gov	CTDEEP	Yes

Meeting Items



May 11, 2021
Interagency Meeting 7
Page 2 of 4

7.1

Topic: General Comments

Status: Open

Discussion:

Presentation:

- Andy Davis (AD) started the Teams meeting with introductions and stated that the Route 7/15 Environmental Assessment report (EA) will be published this summer/fall. The purpose of this meeting is to familiarize agencies with the project. The Project Team will give a brief presentation of the various aspects of the project, particularly the environmental aspects that are noted in the EA. In addition, a site walk is scheduled on Thursday May 13, 2021 that will be discussed at the end of this meeting.
- Yolanda Antoniak (YA) began the presentation by welcoming everyone and went over the location of the project area, discussed the meeting's agenda, the purpose of the project and potential critical issues that the EA addresses (wetlands, noise etc). She also provided a brief recap of the long project history.
- John Eberle (JE) discussed the project location in more detail and how built-up the area is and noted the location of the Norwalk River area and adjacent wetlands.

JE detailed the fundamental issues around Exit 39 specifically the missing connections between Route 7 and the Merritt Parkway that the project aims to solve.

- Matt Arsenault (MA) discussed past wetland and RTE vegetation surveys for the project including the initial wetlands delineations by BL Companies in 2016, the expanded wetlands delineations for a slightly northerly expanded project limit along Route 7 and finally a review of potential 'new' wetlands created upstream of the Flock Process Dam due to its removal a few years ago. To the last point, he stated that, STN did find some minor expansion of wetland areas, but they were not significant.

MA gave a brief overview of RTE Plant surveys concluding that no RTE plant species were observed and no additional plant surveys were recommended.

- Jessica Strauss Hunt (JH) discussed both federal/state RTE species in the project area and noted that no species currently are identified in the area. She did note future needs for consultation on fish etc.
- JE then presented other natural resources or environmental conditions including:

Navigable waters: JE stated that it is anticipated that no formal navigable waters exist within the project area given impoundments, but the team is looking for USCG confirmation of no need for USCG permit or coordination. *[Note: Following the meeting the USCG provided formal determination on May 19, 2021 that the Norwalk River in the project area is non-navigable and the USCG will not require a bridge permit or exemption for the project.]*

Floodplains: JE gave a brief overview of floodplains concentrated along the Norwalk River and that all proposed bridges are anticipated to be clear span structures.

Aquifers: JE noted the presence of the Kellogg-Deering aquifer under the site and that all activities/Best Management Practices (BMP's) would be in accordance with the CTDOT Aquifer Protection Area (APA) Specification.



May 11, 2021
Interagency Meeting 7
Page 3 of 4

Water Resources: JE gave a brief overview of water resources (Norwalk River, intermittent/perennial watercourses and stated that BMP's would be utilized and construction Storm Water Pollution Prevention Plans (SWPPP's) put in place for construction activities.

- JE gave an overview of the robust public outreach on the project including creation of a website for the project that includes 3D models, project meeting minutes etc; Two formal Public Information Meetings (PIM) (Scoping in Fall of 2017 and a General PIM in Fall of 2019); Stakeholder newsletters; newspaper articles, and social media updates. A Project Advisory Committee (PAC) was formed early in the project and has met eight times.
- JE then shared the history of alternatives development starting with a total of 26 alternatives, 25 of which were developed during the previous project. These 26 alternatives were then screened down to 2 alternatives (Alternative 21D and 26) that are being fully assessed in the EA. He stated that both alternatives address project needs but in different ways. He then described the general layouts and differences in the alternatives being considered. Alternative 21D provides the missing Route 7/15 connections by free flow traffic movements while Alternative 26 provides the same missing connections with traffic signals on Route 7. Alternative 26 also results in a comparably smaller footprint than Alternative 21D. He concluded by presenting a summary of anticipated wetland impacts for the alternatives noting that Alt 21D had approximately twice the impacts than Alternative 26.
- YA concluded the presentation by reviewing the project schedule, noting that environmental documentation is expected to be wrapped up by the end of this year. Next steps included finalizing NEPA and CEPA processes, and Agency review of the EA document.

Questions:

- Peter Olmstead (US Army Corps of Engineers [ACOE]): Peter stated he understands alternatives have been screened, but the ACOE will want to see more than the 2 alternatives, including the screening from the 26 alternatives to the 2 alternatives - this could be discussed in the EA or in a supplemental alternatives analysis. Peter said he would need a concise alternative analysis to lead to a decision. He will need to confirm the navigability of the Norwalk River in this area. Definitions of navigable vary between USCG and the ACOE under Section 10. Peter also asked whether CTDOT had considered applying for a General Permit (GP), since linear transportation projects are eligible to use a piecemeal approach if areas of impact meet criteria for "separate and distinct locations". AD responded that CTDOT usually prefers to apply for individual permits, but approach could be discussed during design. Peter noted that use of GP for projects that meet thresholds helps ACOE manage their workload. Peter requested a map showing the wetland impacts for the alternatives and AD confirmed that copies would be provided at the Thursday site walk.
 - JE responded that there is robust documentation of the alternatives screening process in the EA.
 - YA mentioned that this information is available on the website, including PAC meeting minutes to document the screening process.

Peter suggested that if the alternatives analysis section of the EA were sent to him he could provide feedback to assure ACOE guidelines are met. *[Post meeting: JE provided all attendees a link to PAC meetings (Reports of Meetings/Presentations) showing the process and criteria for alternatives screening].*



May 11, 2021
Interagency Meeting 7
Page 4 of 4

- Nate Margason (EPA) stated he is encouraged by the breadth of alternatives and the community outreach. He is looking forward to the site visit on Thursday. He is encouraged with the direction the project is heading.
 - Susan Jacobson (DEEP) asked if the project is considered coastal. As far as navigability, she asked if the bottom of the river is above the (Coastal Jurisdiction Line) elevation of 5.4 feet NGVD88? *[Note: At the subsequent field walk, MA responded that the elevations in this area are 40-50, therefore there should be no coastal involvement.]* She also asked about thoughts on mitigation and if the public has been asked about mitigation.
 - John said they believe there are two impoundments south of the site that would not make navigation possible, and Barbara Wagner confirmed.
 - JE stated that mitigation has not specifically been discussed with stakeholders at this early phase of the project.
 - Andy Davis said there is little available for mitigation within the project site, and that will be a challenge for this project. For the ACOE, mitigation could be in the form of in-lieu fee, but nothing has been determined at this point; DEEP mitigation is to be determined in early design stage.
 - Bruce Williams (DEEP fisheries) suggested there are no barriers downstream. The river is canoeable depending on tides.
 - JE provided the meeting location for Thursday's site walk and will send link to webpage of study.
-

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Interagency Resources Field Walk Meeting
Minutes (CTDOT, CT DEEP, U.S. EPA, Stantec)
May 13, 2021



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Interagency Resources Field Walk 8

Date/Time: May 13, 2021 10:00 AM

Location: 7-15 Project Site

Attendees:

First Name	Last Name	Email	Company	Attended
Matt	Arsenault	matt.arsenault@stantec.com	Stantec Consulting Services Inc.	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Susan	Jacobson	susan.jacobson@ct.gov	CTDEEP	Yes
Nathan	Margason	margason.nathan@epa.gov	US EPA	Yes
Anasse	Ouedraogo	Anasse.Ouedraogo@ct.gov	CTDEEP	Yes
Chris	Samorajczyk	Christopher.Samorajczyk@ct.gov	CTDOT	Yes
Bruce	Williams	bruce.williams@ct.gov	CTDEEP	Yes

Meeting Items

8.1

Topic: GENERAL

Status: Open

Discussion:

As a follow-up to the Interagency Meeting on May 11, 2021, representatives of regulatory agencies (EPA, CTDEEP) met in the field along with CTDOT and Consultant team reps to perform a field walk so agency members could assess the wetlands and watercourses within the project site and potential impacts. Each attendee was provided a handout that showed both concept alternatives under consideration along with their anticipated impacts to wetlands. The handout included a copy of the powerpoint presentation of May 11, 2021.

Invited representative from ACOE was not able to join the review.



May 13, 2021
Interagency Resources Field Walk 8
Page 2 of 3

Before the tour began, Sue Jacobson (SJ) asked about the point she raised at the Interagency Meeting (May 11) and whether the project was above elevation 5.4 (CJL) and thus 'non-coastal' as to jurisdiction. Matt Arsenault (MA) responded that the elevations in this area are 40-50, therefore should be no coastal involvement. SJ concurred.

Matt Arsenault (MA) served as guide and led the group to various key areas so they could understand proposals as well as resources.

Stop 1: Rear of Merritt View building immediately south of Merritt Parkway (MP) and on the eastern bank of the Norwalk River. JE explained that this area was a major proposed bridge crossing for both alts, though Alt 26 had 1 crossing and Alt 21D had 2. MA stated that wetland impacts (mainly on the western side of the river for Alt 21D) were significantly higher than 26.

Comments:

Bruce Williams (BW) (CTDEEP Fisheries) indicated that the Norwalk River had been stocked with sea lampreys over the past year or so. No follow-up sampling has been done yet.

BW stated that for any NNorwalk River crossing there will be a need to maintain fish passage and maintain thalweg of channel with new crossings at all times.

BW stated that all dams from south of the protect area to Wilton have been removed (the last at Merwin's Meadow was being removed now) and there are no impoundments downstream.

Stop 2: Glover Avenue Bridge: JE gave a brief overview of planned changes in the intersection area and that the bridge would need to be replaced. He also pointed out (looking downstream from the bridge toward Merritt Parkway), that the plans for both Alt 21D and 26 were to construct another crossing of the river immediately adjacent to the current MP bridge over the river.

Comments:

BW asked if there were impacts to the river for the new crossing. JE responded that the plan is that all bridges were to be clear span and foundations would be constructed behind the existing river wall.

Stop 3: (Immediately south of MP on the western bank of the Norwalk River (immediately across from Stop 1). MA identified the wetlands that were discussed at Stop 1, but this area gave agency members a chance to review. Agency members then did a site inspection of the wetlands.

JE pointed out all that when the Agencies receive the EA, they will note a series of delineations identified. The first was by BL in 2016 throughout the project area, then there was a slight expansion of the project immediately adjacent to Route 7 and running north toward Grist Mill (identified in the EA) so additional wetlands were identified and mapped. Finally FHWA suggested an investigation on delineations be performed due to Flock Process dam being removed just downstream of the project. MA stated that the investigations led to some additional wetlands that were mapped.

JE asked whether the group wanted to review wetlands along Rte 7, stating that they could do so individually as the wetlands were immediately adjacent to Rte 7 and very easily identified. The group concurred that they can handle on their own if they choose.

MA suggested a final stop at a large wetland area adjacent to Stop and Shop (south of MP) and impacted by



May 13, 2021
Interagency Resources Field Walk 8
Page 3 of 3

the project. All agreed to inspect.

Stop 4: (Wetlands north of Stop and Shop and south of MP.) MA gave a brief overview of the wetlands. Chris Samorajczyk stated that the watercourse in this area came from a pond on the northerly side of the MP and then was culverted under MP to an outlet in the area. JE gave brief description of the impacts of both alternatives in the area, stating that Alt 21D bisected the wetland area due to a need to merge a new lane from Route 7. while; Alt 26 was able to avoid main impacts to the wetlands, though likely would impact the periphery of the wetlands due to grading needs.

Comments:

BW asked if the watercourse the group was standing next to was intermittent or perennial. MA stated it is perennial. MA noted although small, it is a fisheries resource and fish passage needs to be addressed if crossed by alignment.

The surrounding upland was looked at and discussed for potential mitigation, if needed, and CS suggested that this area could be a good spot for wetland creation.

Overall Comments:

CS asked BW whether the TOY restrictions identified currently (April 1-June 30) would satisfy the sea lampreys BW had commented on previously. BW responded he felt they (TOY) would be the same with no fall restrictions or impact to the lampreys.

Nate Margason opined that despite the complexity of the project, it did appear that the impacts were manageable.

Regulators were in agreement that the wetlands being impacted were fragmented with numerous invasive species and of low quality.

The field walk concluded.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

U.S.C.G Letter to CTDOT re: Coast Guard permit
/ exemption requirements

May 19, 2021

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
First Coast Guard District

One South Street
Battery Park Building
New York, NY 10004-1466
Staff Symbol: dpb
Phone: (212) 514-4330
Email: Dale.K.Lewis2@uscg.mil

May 19, 2021

CT Department of Transportation
Natural Resource Planning
Attn: Mr. Andrew H. Davis
Transportation Supervising Planner
Andrew.H.Davis@ct.gov

via e-mail

Re: NV-1095: CT Route 15 over Norwalk River

Dear Mr. Davis,

This is in response to your letter dated May 10, 2021 and corresponding information requesting whether the Coast Guard will require a permit for the referenced bridge project. We have examined the proposed project area with regard to its status as navigable waterways of the United States for purposes of Coast Guard bridge jurisdiction.

Our examination indicates that there is no sufficient factual support for concluding that the Norwalk River, Norwalk, CT, at the project location, has current or historic navigation occurring on this waterway of the United States. Since this is the case, a Coast Guard bridge permit or exemption will not be required for the referenced bridge project.

If you have any questions feel free to contact this office at the number above.

Sincerely,

FISHER.DONNA
A.1063032430

Digitally signed by
FISHER.DONNA.A.1063032430
Date: 2021.05.19 15:19:20
-04'00'

D. A. Fisher
Bridge Program Manager
U.S. Coast Guard
By direction

E-Copy: 1) USCG Sector Long Island Sound, Waterways
2) USACE, New England Division, Navigation Section



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N4
Agency Reviews**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration



Contents

1. Town of Norwalk - 3/24/2017
2. CT – Department of Public Health – 7/11/2017
3. USEPA – 5/7/2017
4. Federal Transit Administration – 4/11/2018
5. Purpose and Needs statement review and responses – 4/4/2018 and following
 - a. OPM 5/23/2018
 - b. SHPO 5/23/208
 - c. USFWS 5/15/2018
 - d. WestCOG – 5/25/2018



March 24, 2017

**John Eberle
Stantec Consulting Services, Inc.
55 Church St. Suite 601
New Haven, CT 06510**

**Re: Preliminary Comments - Proposed Route 7/Merritt Parkway Interchange
Improvements**

Dear Mr. Eberle,

The City of Norwalk is in receipt of your letter dated January 2, 2017 and reviewed the conceptual designs for Alternates 21C and Alternate 26, aka "the Boulevard" and offers the following:

The city continues to support the completion of a properly designed interchange for the Merritt Parkway and Route 7 in order to provide drivers on Route 7 with access to the northbound Merritt Parkway and drivers coming south on the Merritt Parkway access to Route 7 in both directions. The Merritt-7 area has become a vital part of the city's economy and is home to many prominent and expanding CT businesses and is seeing considerable residential development as well. As this area continues to grow it is critical that transportation to and from this area not be a hindrance to future growth.

While we would like to see this project undertaken as soon as possible, we are concerned that there are several other significant projects in the area that need to be considered before a final design is selected for the Merritt-7 interchange:

1. The reconstruction of the Glover Avenue Bridge.
2. A final determination regarding design and realignment of the Route 7 - Grist Mill terminus.
3. Main Avenue roadway improvements.
4. Glover Avenue Rail Station.
5. The Norwalk River Valley Trail (see attached).

The City also supports the completion of a limited access highway to Danbury, which would better connect people and businesses between Danbury and Norwalk. The new Boulevard interchange design concept, being reviewed as a possible replacement to the original approved plan, would eliminate the thruway that allows traffic to bypass local roads in-between Interstate 95 and Wilton. This could result in increased traffic on Main Avenue, our local roads and increased commuting times. It should be noted that while the existing thruway was designed as part of a larger project, the introduction of a multi-lane highway into Norwalk resulted in the disruption and separation of several existing neighborhoods.

In addition, the City has several other concerns with the proposed design for the modified Boulevard Interchange configuration:

- a. Design: The City is concerned that the introduction of traffic lights and crossing traffic onto what is a heavily trafficked, high-speed, limited access highway may result in increased congestion and more dangerous traffic conditions.
- b. Impact on wetlands: Consideration should be given to whether the Boulevard design would affect more wetlands and upland areas that are adjacent to the Norwalk River than the original design or the Alternate 21C design.
- c. Impact on Scenic Road: The Merritt Parkway is a designated scenic road and special consideration should be given to minimizing the removal of trees and natural features along the Parkway.
- d. Noise impacts and air quality: If the revised design results in increased traffic congestion, particularly at the proposed new expressway traffic lights, this could lead to increased noise and air pollution.

For your convenience I have attached relevant excerpts of the city's Plan of Conservation and Development, which provide further evidence of the city's position regarding these issues.

It appears that the Boulevard interchange configuration is a more compact proposal and we request that you consider whether the ramp locations to the east of the thruway, depicted in alternate 26, could be utilized regardless of the Boulevard concept. This could allow for increased area for future development.

Lastly, as I indicated in a previous email, we cannot definitively say that you are prohibited from storing portable fuel tanks or chemical containers within the well field, but considering the fact that this may be a lengthy project and until we have more detail on the scope and duration of the project, we have to indicate that it is not permitted at this time.

It is our position that these comments should be considered preliminary, until such time that a final design is recommended and more developed plans are available. More importantly, we would urge the CT DOT to withhold a final design recommendation until all the other transportation projects mentioned previously, that are either being planned or being studied, are closer to final recommendations.

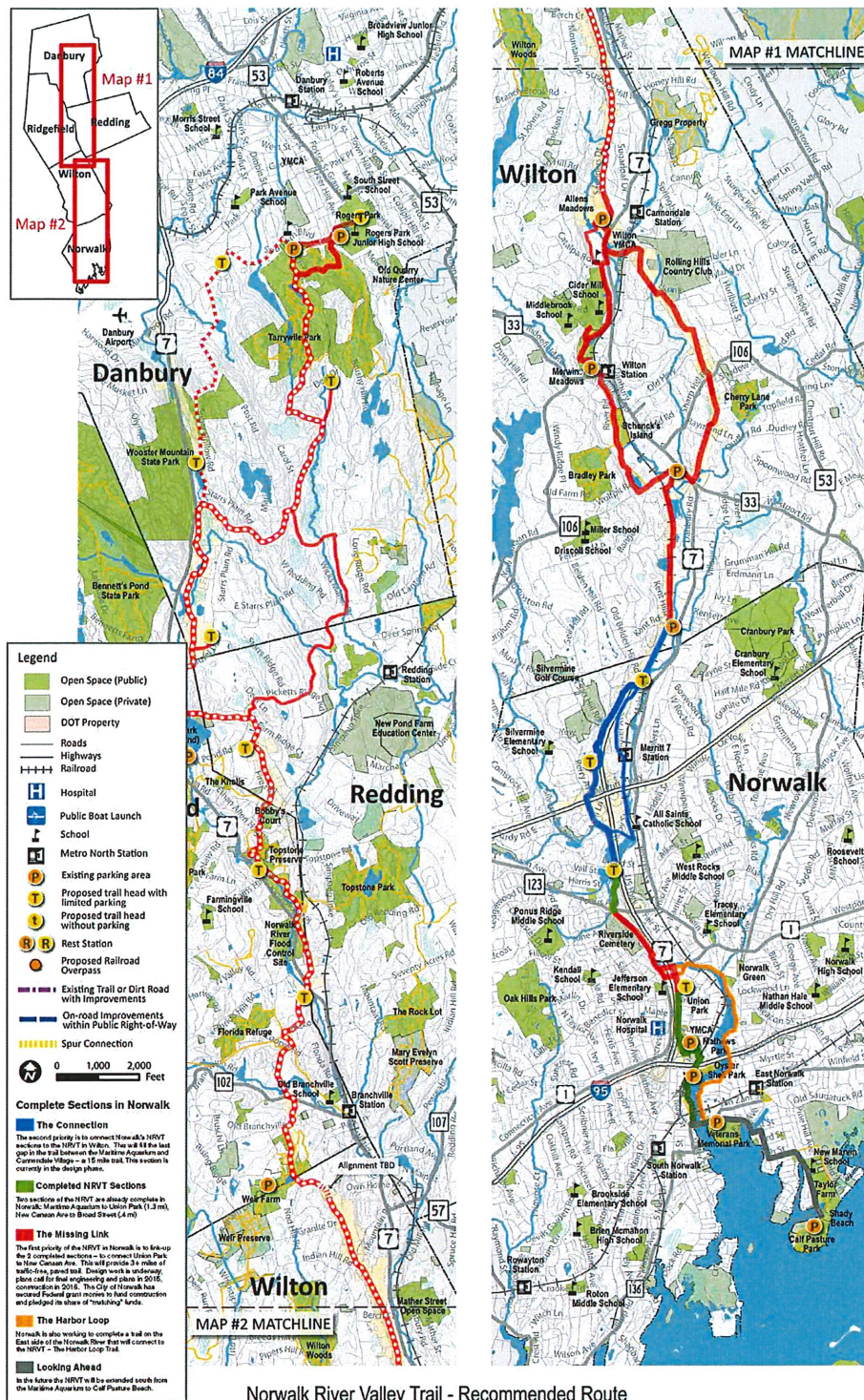
Should you have any questions or need further assistance, please do not hesitate to contact me.

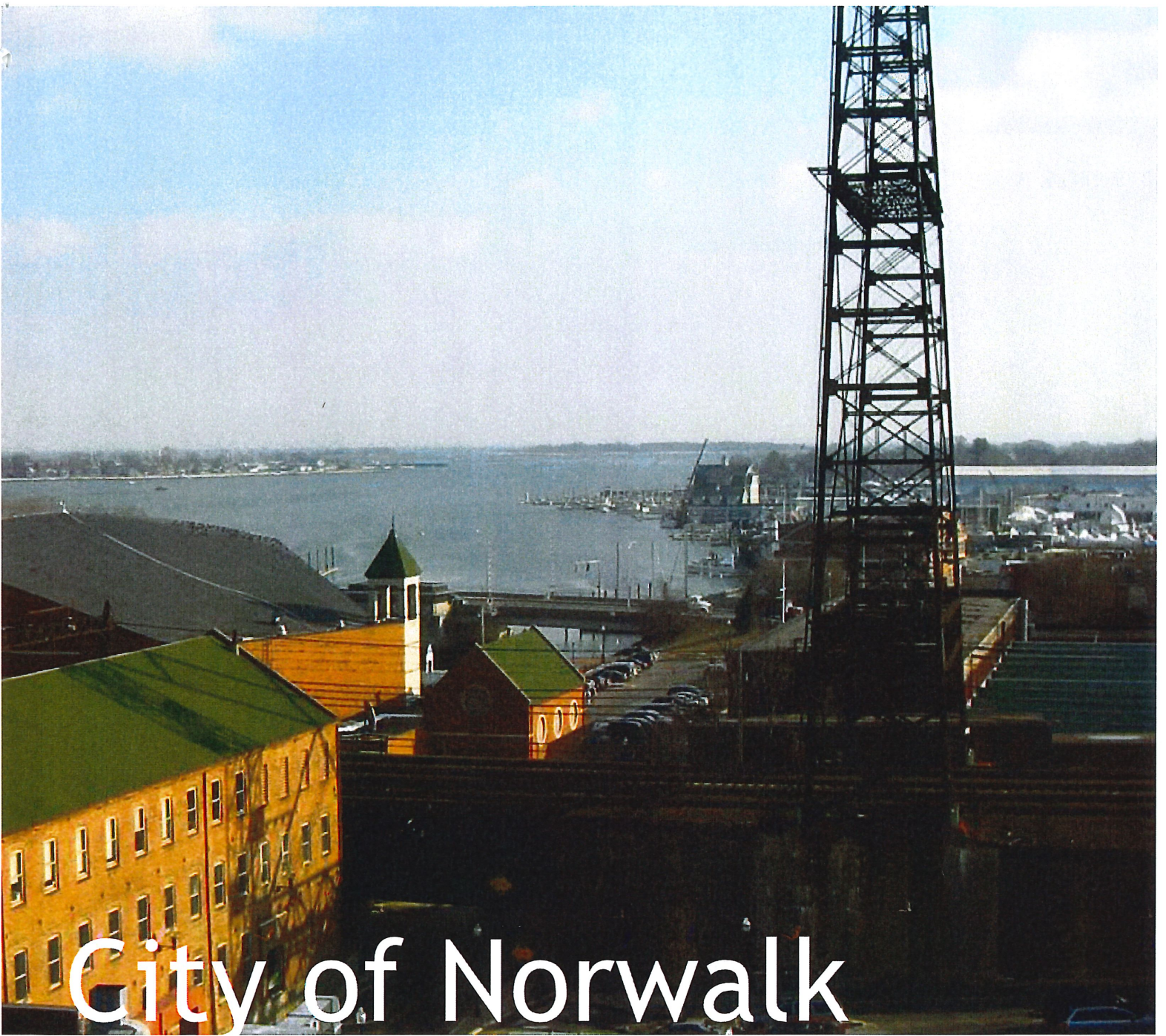
Sincerely,



Steve Kleppin, AICP
Planning and Zoning Director

- c/
- D. Wilson, Sr. Planner
 - L. Burns, Principal Engineer
 - M. Yeosock, Asst. Principal Engineer
 - A. Cherichetti, Sr. Environmental Officer
 - B. Hrtanek, Environmental Compliance Officer





City of Norwalk

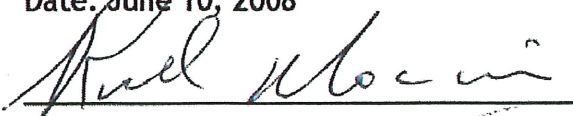
Plan of Conservation & Development

Adopted by the Planning Commission

Date: June 10, 2008

Adopted by the Common Council

Date: June 10, 2008

A handwritten signature in black ink, appearing to read "Paul Moccia", written over a horizontal line.

Signed by Mayor Moccia

Date: June 18, 2008

Effective: July 3, 2008

B. Environment & Infrastructure

B.7. HAZARDOUS MATERIALS

B.7.1 Ensure proper handling and disposal of hazardous materials

- B.7.1.1 Encourage the implementation of remedial measures at sites contaminated with hazardous wastes as identified in the state's January 2000 inventory
- B.7.1.2 Continue to educate public on proper disposal ("Flows to Sound")
- B.7.1.3 Support all appropriate measures to avoid fuel and chemical spills in or near the harbor
- B.7.1.4 Provide immediate response to fuel and chemical spills
- B.7.1.5 Implement a program for the legal disposal of hazardous materials by residents on a regular basis

B.8. SUSTAINABILITY

B.8.1 Adopt programs which promote resource conservation and discourage waste

- B.8.1.1 Establish clearly defined municipal goals related to sustainable design and energy efficiency for new construction projects over ten thousand square feet, and develop related municipal incentives that encourage the implementation of these goals and objectives for approval by the Common Council
- B.8.1.2 Encourage the use of recycled materials for construction, paving, and other areas where economically feasible
- B.8.1.3 Encourage the use of energy efficient fixtures and appliances
- B.8.1.4 Encourage the development and use of alternative energy resources such as wind, solar, and others within projects over one hundred thousand square feet by establishing a related municipal tax incentive policy that advances the development of these renewable energy systems.

B.9. AIR QUALITY

B.9.1 Achieve the Clean Air Act ambient air quality standards

- B.9.1.1 The Office of Corporation Counsel shall explore the potential powers available to the City to sanction businesses or property owners within the City who have been ordered to remediate environmental conditions on their property or take corrective actions regarding emissions but have failed to do so
- B.9.1.1 Support construction of Route 7 from Norwalk to Danbury to reduce air pollution caused by traffic congestion
- B.9.1.2 Continue to fund the citywide tree planting and maintenance program
- B.9.1.3 Support the Connecticut Department of Environmental Protection's implementation plans to achieve ambient air quality standards

C. Open Space & Recreation Systems

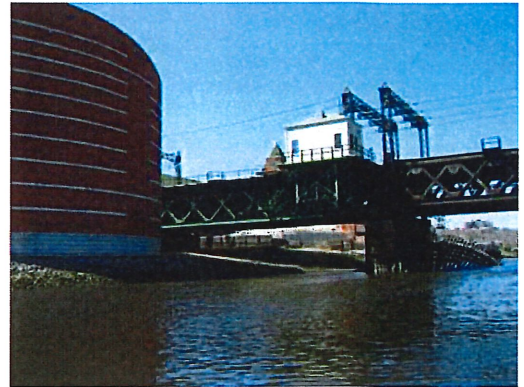
- C.3.1.4 Provide an improved recreational experience to South Norwalk residents beyond that currently available at Ryan Park; refurbish Ryan Park to suit residents' needs and establish park constituency
- C.3.1.5 Examine the potential for a skating rink in the City of Norwalk by private parties to augment recreational opportunities available to residents
- C.3.1.6 Examine the potential for an indoor swimming pool in the City of Norwalk to augment recreational opportunities available to residents
- C.3.1.7 Inventory necessary public amenity upgrades at existing neighborhood parks. Public amenities such as restroom facilities, lighting, and seating areas should be deemed as necessary

C.3.2 Improve and maintain existing recreational facilities

- C.3.2.1 Expand user fees to partially defray the expense of providing recreational facilities and programs
- C.3.2.1 Increase use of school gyms for recreational programs
- C.3.2.2 Prepare and implement program for making all facilities ADA compliant
- C.3.2.3 Develop and adopt management or stewardship plans for open space lands to ensure on-going maintenance, with cooperation of the Dept. of Rec & Parks

C.4.1 Create a network of walking and bicycle trails among neighborhoods, points of interest, and opposite sides of the river and harbor

- C.4.1.1 Create a plan for bikeways linking residential areas with downtown and provide capital budget funds in Parks and Recreation budget
- C.4.1.2 Establish appropriate bike lanes on select streets
- C.4.1.3 Provide capital budget funding to fill in "gaps" in the Riveredge Park and Bikeway along the Norwalk River
- C.4.1.4 Provide funding for a pedestrian circulation system of sidewalks, new and reclaimed footpaths, and crosswalks, especially in high traffic areas
- C.4.1.5 Encourage participation in the "Become a NorWALKER" program of the Norwalk Healthy Partnership's Healthy Lifestyles Cardiovascular Project
- C.4.1.6 Add new NorWALKER routes
- C.4.1.7 Plan for footpaths and trails on park and state land, including utility easements, and institute tax incentives for trails and footpaths on private land
- C.4.1.8 Fund an extension of the Harbor trail and enhance pedestrian river crossings
- C.4.1.9 Support the construction of Route 7 Linear park **NRVT**
- C.4.1.10 Implement the regional trail/bikeway (the "Linear Trail") along southern edge of Merritt Parkway right-of-way



An attractive waterside promenade or boardwalk would do more than fill in a missing pedestrian link in this the important node of resident and visitor activity; it could also provide additional space for excursion or display vessels, and help mitigate the limitations of North Water Street where narrow sidewalks can be difficult for families to navigate.

C.4. TRAILS & BIKEWAYS



Ryan Park

E. Transportation



In Richmond, Virginia, a suspended pedestrian bridge extends over the James River, connecting two public recreation areas and providing dramatic views of the city.



"Limited access" refers to a roadway which permits access via entrance and exit ramps, and prohibits driveways and other encroachments. I-95 is an example of a road with limited access.

E.4. BRIDGES

E.3.3 Maintain vehicular and pedestrian ways continuously and at a high level

- E.3.3.1 Adopt a workable repair and maintenance program for sidewalks and footpaths, and provide capital budget funds
- E.3.3.2 Improve coordination between Department of Public Works and Department of Transportation during road construction to better accommodate walkers and bikers
- E.3.3.3 Continue to implement the Road Evaluation and Pavement Management program by providing Capital Budget and Operating Budget funds for the 4R Paving Program (rehabilitation, recycling, repaving, and reconstruction)
- E.3.3.4 Encourage the Connecticut Department of Transportation to improve maintenance of state-owned roads and bridges within Norwalk
- E.3.3.5 Require the Department of Public Works to provide a plan for the evaluation and repair of roads
- E.3.3.6 Preserve and enhance the pedestrian experience on Main Street

E.3.4 Complete planned roadway construction projects

- E.3.4.1 Support the completion of limited access Route 7 by 2015
- E.3.4.2 Support the Transportation Improvement Program projects
- E.3.4.3 Encourage the Connecticut Department of Transportation to reconstruct Route 1 from Exit 14 to Westport to a four lane arterial with left turn lanes at major intersections; begin with Cross Street and North Avenue to Westport Avenue, by 2016
- E.3.4.4 Include improvements at traffic signals and certain intersections during the Route 1 widening project and consideration of additional left-hand turn lanes
- E.3.4.5 Require all road repairs to be completed in a timely manner and in an acceptable fashion

E.4.1 Maintain a system of bridges to facilitate safe and efficient vehicular and pedestrian movement

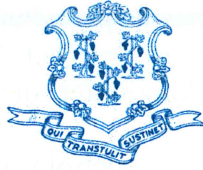
- E.4.1.1 Maintain a local bridge inspection and rehabilitation replacement program
- E.4.1.2 Support Capital Budget requests for local bridge maintenance program and the use of the State and Federal "Local Bridge Revolving Funds"
- E.4.1.3 Minimize impact upon neighborhoods and develop designs that are sensitive to the community when replacing bridges
- E.4.1.4 Bridges and roadways over navigable waterways should be maintained, operated, repaired, built to avoid or reduce potential for any significant adverse impacts on navigation, safety, environmental quality
- E.4.1.5 Monitor work on bridge crossings for avoidance/reduction of impacts on water quality

E.4.2 Incorporate pedestrian convenience and safety at all bridges and overpasses

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.
Commissioner



Dannel P. Malloy
Governor

Nancy Wyman
Lt. Governor

Drinking Water Section

July 11, 2017

Mr. Andy Fesenmeyer
Transportation Supervising Engineer
State of Connecticut
Department of Transportation
Bureau of Engineering and Construction
2800 Berlin Turnpike, PO Box 317546
Newington, CT 06131-7546

Re: Draft Environmental Assessment/Environmental Impact Evaluation
Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358
DPH Project No. 2017-0166

Dear Mr. Fesenmeyer:

The Department of Public Health (DPH) Drinking Water Section (DWS) is in receipt of the Draft Purpose and Need Statement for the subject EA/EIE. The proposed project area is partially within the Level A Aquifer Protection Area (APA) of the Kellogg Deering Wellfield, a source of public drinking water for the customers of the Norwalk First Taxing District.

Planning, construction and long term maintenance of the proposed interchange improvements should take into consideration protection of the source of public drinking water. Please consider addressing the following items in the EA/EIE:

1. During the planning phase the following should be addressed:
 - a. The Norwalk First Taxing District should be consulted to provide the delineation of the Level A APA and specific source protection recommendations.
 - b. The storm water system should be designed to minimize impacts to the water quality of the source of public drinking water.



Phone: (860) 509-7333 • Fax: (860) 509-7359
410 Capitol Avenue, MS#12DWS, P.O. Box 340308
Hartford, Connecticut 06134-0308
www.ct.gov/dph

Affirmative Action/Equal Opportunity Employer



2. Construction should be conducted in accordance with the DPH's "General Construction Best Management Practices for Sites within a Public Drinking Water Supply Area"
3. Long term maintenance of the proposed project should include measures that protect the long term purity of the public drinking water source of supply. Such measures include but may not be limited to:
 - a. Utilizing mechanical means to control vegetation rather than applying pesticides.
 - b. Reducing application rates of deicing chemicals to the road surfaces in the winter in a manner that balances the needs for public safety with the potential public health impacts resulting from increasing sodium and chloride concentrations in the source water for public drinking water supplies.
 - c. Maintaining the storm water system in accordance with the Department of Energy and Environmental Protection's General Permit for the Discharge of Stormwater from Department of Transportation Separate Storm Sewer Systems.

Thank you for the opportunity to provide early input into this draft document.

Sincerely,



Lori J. Mathieu
Public Health Section Chief
Drinking Water Section

Cc: Dominick Di Gangi, P.E., Norwalk First Taxing District

From: Rozanski, Becky
Sent: Monday, May 07, 2018 8:40 AM
To: Antoniak, Yolanda M
Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

For you, more than me ☺

Happy Monday.

From: Margason, Nathan [<mailto:Margason.Nathan@epa.gov>]
Sent: Monday, May 07, 2018 8:24 AM
To: Rozanski, Becky; Fesenmeyer, Andy A.
Cc: Timmermann, Timothy
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Hi Andy,

We have reviewed the edits to the draft Purpose and Need Statement and concur with the revisions, as they align with the edits discussed at the coordination meeting. In addition, we agree with your assessment of the "Existing Infrastructure Conditions" section, and your recommendation for eliminating this section from the P&N Statement. Please forward any final edits and keep us informed of any future project coordination.

Thanks,
Nate

Nathan Margason

US Environmental Protection Agency
Wetlands Protection Unit
5 Post Office Square
Suite 100 (OEP06-3)
Boston, MA 02109

P: 617-918-1172
E: margason.nathan@epa.gov

From: Rozanski, Becky [<mailto:Becky.Rozanski@ct.gov>]
Sent: Wednesday, April 04, 2018 14:26
To: Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; 'sergio.coronado@ct.gov' <sergio.coronado@ct.gov>; Doyle, Thomas H <Thomas.Doyle@ct.gov>; 'Eberle, John' <John.Eberle@stantec.com>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; 'Hansen, Christopher (FHWA)' <christopher.hansen@dot.gov>; Iozzo, Richard <Richard.Iozzo@ct.gov>; Lesay, Kimberly C <Kimberly.Lesay@ct.gov>; 'Ken Livingston' <klivingston@fhiplan.com>; Margason, Nathan <Margason.Nathan@epa.gov>; 'christopher.mojica@stantec.com' <christopher.mojica@stantec.com>; Riese, Frederick <Frederick.Riese@ct.gov>; 'leah.sirmin@dot.gov' <leah.sirmin@dot.gov>; Speal, Charles S <Charles.Speal@ct.gov>; 'pstanton@fhiplan.com' <pstanton@fhiplan.com>; Wisniewski, Marena <Marena.Wisniewski@ct.gov>; 'bruce.witchen@ct.gov' <bruce.witchen@ct.gov>
Cc: Brian Thompson <Brian.Thompson@ct.gov>; Caiola, Jeff <Jeff.Caiola@ct.gov>; Aarrestad, Peter

<Peter.Aarrestad@ct.gov>; 'susan.k.lee@usace.army.mil' <susan.k.lee@usace.army.mil>;
'mary.mello@dot.gov' <mary.mello@dot.gov>; 'david.simmons@fws.gov' <david.simmons@fws.gov>;
'john_warner@fws.gov' <john_warner@fws.gov>; Timmermann, Timothy
<Timmermann.Timothy@epa.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Morley, Dan D.
<Daniel.Morley@ct.gov>; 'eloise.powell@dot.gov' <eloise.powell@dot.gov>; 'Timothy.Snyder@dot.gov'
<Timothy.Snyder@dot.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>;
Lori.mathieu@ct.gov; 'HRilling@norwalkct.org' <HRilling@norwalkct.org>; 'fpickering@westcog.org'
<fpickering@westcog.org>

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation

860-594-3158

Becky.Rozanski@ct.gov

From: Coronado, Sergio (FTA) <sergio.coronado@dot.gov>
Sent: Wednesday, April 11, 2018 1:49 PM
To: Antoniak, Yolanda M
Cc: Rozanski, Becky; Wood, Kristin (FTA); Sirmin, Leah (FTA)
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Categories: File

Hey Yolanda,

FTA concurs with the current assessment and has no additional comments. Let me know if you have any questions or concerns!

Respectfully, Sergio

Sergio Coronado

Program Manager
Federal Transit Administration
55 Broadway, Suite 920, Room 958
Cambridge, MA 02142-1093
617-494-2792
sergio.coronado@dot.gov



From: Antoniak, Yolanda M [<mailto:Yolanda.Antoniak@ct.gov>]
Sent: Wednesday, April 04, 2018 3:29 PM
To: Coronado, Sergio (FTA) <sergio.coronado@dot.gov>
Cc: Rozanski, Becky <Becky.Rozanski@ct.gov>
Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Hello Sergio-

The e-mail below was sent to Agency representatives concerning the Draft Purpose and Need Statement based on comments from our February meeting. Your e-mail was returned and I am resending it to you with your correct e-mail address.

Feel free to contact me or Andy Fesenmeyer with any questions. My apologies for any confusion.

Thank you,

Yolanda

Yolanda Antoniak, P.E.
Project Engineer

Conn. Dept. of Transportation
Highway Design Division
Tel.(860) 594-3197

2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky

Sent: Wednesday, April 04, 2018 2:26 PM

To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'

Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov'; 'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
[**Becky.Rozanski@ct.gov**](mailto:Becky.Rozanski@ct.gov)

From: [Eberle, John](#)
To: 7-15_Norwalk@docs.e-builder.net
Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up
Date: Friday, April 6, 2018 11:24:52 AM
Attachments: [2018-03-21 Approved ROM- Agency Coordination Meeting - 02282018.pdf](#)
[3-21-18 Agency Revised PN Statement.docx](#)
[Track Changes 3-21-18 Agency Revised PN Statement.docx](#)

From: Rozanski, Becky [mailto:Becky.Rozanski@ct.gov]

Sent: Wednesday, April 04, 2018 2:26 PM

To: Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; 'sergio.coronado@ct.gov' <sergio.coronado@ct.gov>; Doyle, Thomas H <Thomas.Doyle@ct.gov>; Eberle, John <John.Eberle@stantec.com>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; 'Hansen, Christopher (FHWA)' <christopher.hansen@dot.gov>; Iozzo, Richard <Richard.Iozzo@ct.gov>; Lesay, Kimberly C <Kimberly.Lesay@ct.gov>; 'Ken Livingston' <klivingston@fhiplan.com>; 'margason.nathan@epa.gov' <margason.nathan@epa.gov>; Mojica, Christopher <Christopher.Mojica@stantec.com>; Riese, Frederick <Frederick.Riese@ct.gov>; 'leah.sirmin@dot.gov' <leah.sirmin@dot.gov>; Speal, Charles S <Charles.Speal@ct.gov>; 'pstanton@fhiplan.com' <pstanton@fhiplan.com>; Wisniewski, Marena <Marena.Wisniewski@ct.gov>; 'bruce.witchen@ct.gov' <bruce.witchen@ct.gov>
Cc: Thompson, Brian <Brian.Thompson@ct.gov>; Caiola, Jeff <Jeff.Caiola@ct.gov>; Aarrestad, Peter <Peter.Aarrestad@ct.gov>; 'susan.k.lee@usace.army.mil' <susan.k.lee@usace.army.mil>; 'mary.mello@dot.gov' <mary.mello@dot.gov>; 'david.simmons@fws.gov' <david.simmons@fws.gov>; 'john_warner@fws.gov' <john_warner@fws.gov>; 'timmermann.timothy@epa.gov' <timmermann.timothy@epa.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Morley, Dan D. <Daniel.Morley@ct.gov>; 'eloise.powell@dot.gov' <eloise.powell@dot.gov>; 'Timothy.Snyder@dot.gov' <Timothy.Snyder@dot.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>; Mathieu, Lori <Lori.Mathieu@ct.gov>; 'HRilling@norwalkct.org' <HRilling@norwalkct.org>; 'fpickering@westcog.org' <fpickering@westcog.org>

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov

From: Wittchen, Bruce
Sent: Wednesday, May 23, 2018 3:16 PM
To: Antoniak, Yolanda M
Cc: Morley, Dan D.; Pafford, Matthew
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Categories: File

Thanks Yolanda.

I made some comments regarding the purpose & need statement when I attended the meeting and it looks like they've been incorporated into the updated document. We remain concerned about the apparent segmentation between what appear to be closely associated projects in that area, but can wait for an EIE to see how DOT explains the scope of this environmental review. Bruce

Bruce Wittchen
Office of Policy & Management
450 Capitol Ave, MS# 54ORG
Hartford, CT 06106
(860) 418-6323
(860) 418-6493 (fax)
bruce.wittchen@ct.gov

From: Antoniak, Yolanda M
Sent: Monday, May 07, 2018 1:54 PM
To: Thompson, Brian <Brian.Thompson@ct.gov>; Caiola, Jeff <Jeff.Caiola@ct.gov>; Jacobson, Rick <Rick.Jacobson@ct.gov>; Riese, Frederick <Frederick.Riese@ct.gov>; Aarrestad, Peter <Peter.Aarrestad@ct.gov>; 'susan.k.lee@usace.army.mil' <susan.k.lee@usace.army.mil>; 'David_Simmons@fws.gov' <David_Simmons@fws.gov>; 'tom_chapman@fws.gov' <tom_chapman@fws.gov>; Morley, Dan D. <Daniel.Morley@ct.gov>; Wittchen, Bruce <Bruce.Wittchen@ct.gov>; 'Christopher.Hansen@dot.gov' <Christopher.Hansen@dot.gov>; 'Timothy.Snyder@dot.gov' <Timothy.Snyder@dot.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>; Mathieu, Lori <Lori.Mathieu@ct.gov>; Iozzo, Richard <Richard.Iozzo@ct.gov>; 'HRilling@norwalkct.org' <HRilling@norwalkct.org>; 'fpickering@westcog.org' <fpickering@westcog.org>; Doyle, Thomas H <Thomas.Doyle@ct.gov>; Lesay, Kimberly C <Kimberly.Lesay@ct.gov>; Speal, Charles S <Charles.Speal@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Wisniewski, Marena <Marena.Wisniewski@ct.gov>
Cc: 'mary.mello@dot.gov' <mary.mello@dot.gov>; 'leah.sirmin@dot.gov' <leah.sirmin@dot.gov>; 'Coronado, Sergio (FTA)' <sergio.coronado@dot.gov>; 'margason.nathan@epa.gov' <margason.nathan@epa.gov>; 'timmermann.timothy@epa.gov' <timmermann.timothy@epa.gov>; Eberle, John <John.Eberle@stantec.com>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Livingston, Kenneth <Kenneth.Livingston@ct.gov>; Mojica, Christopher <Christopher.Mojica@stantec.com>; 'pstanton@fhiplan.com' <pstanton@fhiplan.com>; Rozanski, Becky <Becky.Rozanski@ct.gov>

Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hello Everyone,

I'm the ConnDOT Project Engineer for the Route 7/15 Interchange and am working with Andy Fesenmeyer on this project.

As a follow up to Andy's e-mail (below) concerning the review of the updated Draft Purpose and Need Statement (rev. March 21, 2018), I am resending the attachments listed in our earlier e-mail for all to review, requesting comments/ concurrence from all Agencies, **including Agency representatives that were not able to attend our February meeting.**

To date, we have heard back from the FTA Region 1 Office and from the US Environmental Protection Agency. Both Agencies concur with our assessment to eliminate the new section "Existing Infrastructure Conditions" and have no other comments at this time.

Please take a look at the attached Draft Purpose and Need Statement (same as the one sent to you previously) and provide your feedback by **Friday, May 25th** if possible. A version with the tracked changes and Report of Meeting with the edited presentation slides is also attached for reference.

Thank you for your help and feel free to contact me or Andy should you have any questions or need additional information.

Yolanda

Yolanda Antoniak, P.E.
Project Engineer
Conn. Dept. of Transportation
Highway Design Division
Tel.(860) 594-3197

2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky

Sent: Wednesday, April 04, 2018 2:26 PM

To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'

Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov';

'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov

From: Labadia, Catherine
Sent: Wednesday, May 23, 2018 12:58 PM
To: Antoniak, Yolanda M; Thompson, Brian; Caiola, Jeff; Jacobson, Rick; Riese, Frederick; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'David_Simmons@fws.gov'; 'tom_chapman@fws.gov'; Morley, Dan D.; Wittchen, Bruce; 'Christopher.Hansen@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; Iozzo, Richard; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'; Doyle, Thomas H; Lesay, Kimberly C; Speal, Charles S; Wisniewski, Marena
Cc: 'mary.mello@dot.gov'; 'leah.sirmin@dot.gov'; 'Coronado, Sergio (FTA)'; 'margason.nathan@epa.gov'; 'timmermann.timothy@epa.gov'; Eberle, John; Fesenmeyer, Andy A.; Livingston, Kenneth; Mojica, Christopher; 'pstanton@fhiplan.com'; Rozanski, Becky
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Categories: Follow up

Thank you Yolanda and Andy,
SHPO also prefers the updated text and has no additional comments.
Cathy

From: Antoniak, Yolanda M
Sent: Monday, May 07, 2018 1:54 PM
To: Thompson, Brian <Brian.Thompson@ct.gov>; Caiola, Jeff <Jeff.Caiola@ct.gov>; Jacobson, Rick <Rick.Jacobson@ct.gov>; Riese, Frederick <Frederick.Riese@ct.gov>; Aarrestad, Peter <Peter.Aarrestad@ct.gov>; 'susan.k.lee@usace.army.mil' <susan.k.lee@usace.army.mil>; 'David_Simmons@fws.gov' <David_Simmons@fws.gov>; 'tom_chapman@fws.gov' <tom_chapman@fws.gov>; Morley, Dan D. <Daniel.Morley@ct.gov>; Wittchen, Bruce <Bruce.Wittchen@ct.gov>; 'Christopher.Hansen@dot.gov' <Christopher.Hansen@dot.gov>; 'Timothy.Snyder@dot.gov' <Timothy.Snyder@dot.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>; Mathieu, Lori <Lori.Mathieu@ct.gov>; Iozzo, Richard <Richard.Iozzo@ct.gov>; 'HRilling@norwalkct.org' <HRilling@norwalkct.org>; 'fpickering@westcog.org' <fpickering@westcog.org>; Doyle, Thomas H <Thomas.Doyle@ct.gov>; Lesay, Kimberly C <Kimberly.Lesay@ct.gov>; Speal, Charles S <Charles.Speal@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Wisniewski, Marena <Marena.Wisniewski@ct.gov>
Cc: 'mary.mello@dot.gov' <mary.mello@dot.gov>; 'leah.sirmin@dot.gov' <leah.sirmin@dot.gov>; 'Coronado, Sergio (FTA)' <sergio.coronado@dot.gov>; 'margason.nathan@epa.gov' <margason.nathan@epa.gov>; 'timmermann.timothy@epa.gov' <timmermann.timothy@epa.gov>; Eberle, John <John.Eberle@stantec.com>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Livingston, Kenneth <Kenneth.Livingston@ct.gov>; Mojica, Christopher <Christopher.Mojica@stantec.com>; 'pstanton@fhiplan.com' <pstanton@fhiplan.com>; Rozanski, Becky <Becky.Rozanski@ct.gov>
Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hello Everyone,

I'm the ConnDOT Project Engineer for the Route 7/15 Interchange and am working with Andy Fesenmeyer on this project.

As a follow up to Andy's e-mail (below) concerning the review of the updated Draft Purpose and Need Statement (rev. March 21, 2018), I am resending the attachments listed in our earlier e-mail for all to review, requesting comments/ concurrence from all Agencies, **including Agency representatives that were not able to attend our February meeting.**

To date, we have heard back from the FTA Region 1 Office and from the US Environmental Protection Agency. Both Agencies concur with our assessment to eliminate the new section "Existing Infrastructure Conditions" and have no other comments at this time.

Please take a look at the attached Draft Purpose and Need Statement (same as the one sent to you previously) and provide your feedback by **Friday, May 25th** if possible. A version with the tracked changes and Report of Meeting with the edited presentation slides is also attached for reference.

Thank you for your help and feel free to contact me or Andy should you have any questions or need additional information.

Yolanda

Yolanda Antoniak, P.E.
Project Engineer
Conn. Dept. of Transportation
Highway Design Division
Tel.(860) 594-3197

2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky

Sent: Wednesday, April 04, 2018 2:26 PM

To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'

Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov'; 'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov

From: David Simmons <David_Simmons@fws.gov>
Sent: Tuesday, May 15, 2018 5:32 PM
To: Antoniak, Yolanda M
Subject: RE: [EXTERNAL] FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hi Yolanda,

I have no reason not to concur with CT DOT's proposal for the Draft Purpose and Need Statement and have no additional comments at this time. Regards,
David

David Simmons
Endangered Species Program Supervisor
New England Fish and Wildlife Office
U.S. Fish and Wildlife Service
70 Commercial Street, Suite 300
Concord, New Hampshire 03301
603.227.6425

From: Antoniak, Yolanda M [mailto:Yolanda.Antoniak@ct.gov]
Sent: Monday, May 07, 2018 1:54 PM
To: Thompson, Brian; Caiola, Jeff; Jacobson, Rick; Riese, Frederick; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'David_Simmons@fws.gov'; 'tom_chapman@fws.gov'; Morley, Dan D.; Wittchen, Bruce; 'Christopher.Hansen@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; Iozzo, Richard; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'; Doyle, Thomas H; Lesay, Kimberly C; Speal, Charles S; Labadia, Catherine; Wisniewski, Marena
Cc: 'mary.mello@dot.gov'; 'leah.sirmin@dot.gov'; 'Coronado, Sergio (FTA)'; 'margason.nathan@epa.gov'; 'timmermann.timothy@epa.gov'; Eberle, John; Fesenmeyer, Andy A.; Livingston, Kenneth; Mojica, Christopher; 'pstanton@fhiplan.com'; Rozanski, Becky
Subject: [EXTERNAL] FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hello Everyone,

I'm the ConnDOT Project Engineer for the Route 7/15 Interchange and am working with Andy Fesenmeyer on this project.

As a follow up to Andy's e-mail (below) concerning the review of the updated Draft Purpose and Need Statement (rev. March 21, 2018), I am resending the attachments listed in our earlier e-mail for all to review, requesting comments/ concurrence from all Agencies, **including Agency representatives that were not able to attend our February meeting.**

To date, we have heard back from the FTA Region 1 Office and from the US Environmental Protection Agency. Both Agencies concur with our assessment to eliminate the new section "Existing Infrastructure Conditions" and have no other comments at this time.

Please take a look at the attached Draft Purpose and Need Statement (same as the one sent to you previously) and provide your feedback by **Friday, May 25th** if possible. A version with the tracked changes and Report of Meeting with the edited presentation slides is also attached for reference.

Thank you for your help and feel free to contact me or Andy should you have any questions or need additional information.

Yolanda

Yolanda Antoniak, P.E.
Project Engineer
Conn. Dept. of Transportation
Highway Design Division
Tel.(860) 594-3197

2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky
Sent: Wednesday, April 04, 2018 2:26 PM
To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'
Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov'; 'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'
Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

Report of Meeting (includes edited presentation slides and notations from meeting)
Updated Draft Purpose and Need Statement (Revised March 21, 2018)
Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled “Existing Infrastructure Conditions” which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a ‘secondary purpose’. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov

From: Kristin Hadjstylianos <khadjstylianos@westcog.org>
Sent: Friday, May 25, 2018 6:10 PM
To: Antoniak, Yolanda M; Fesenmeyer, Andy A.
Cc: Francis R. Pickering
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Good afternoon,

Thank you for the opportunity to review the draft Purpose and Need Statement for the Route 7/15 Interchange project. WestCOG has reviewed the document and offers the following comments:

Project Needs:

Roadway System Linkage:

- Consideration should be given to the relationship between the Merritt Parkway, Route 7 and Interstate 95. This is a critical link in the south western region, particularly during peak commute hours when congestion is at its worst. The current interchange configuration does not allow for direct access to either highway via Route 7. In absence of this connection, vehicles must use the local roadway network to navigate between highways.
- Consideration should also be given to the regional impacts this project may have on the function of the larger transportation network. The development of alternatives should evaluate the opportunity to improve congestion and travel time reliability. Enhancing access between the Merritt Parkway and I-95 via Route 7 could reduce congestion by providing more flexibility in travel patterns. For example, during times when the I-95 corridor is congested, vehicles could use Route 7 to redirect to the Merritt Parkway which has greater capacity to move vehicles compared to the local road network. Creating a direct connection between these corridors could also reduce vehicular delays and result in an improvement to overall system performance and travel time. These topics are of significant interest to the South Western Region MPO as staff continue to monitor congestion and reliability as part of the FAST Act performance measures requirements.
- Emergency management should also be considered during the development of alternatives. In the event of an emergency evacuation in the south western region, lack of a direct access between the Merritt Parkway and I-95 impedes the ability to move vehicles. Creating a direct connection between these corridors through Route 7 would likely improve emergency operations and allow residents to evacuate quicker.

Mobility:

- Consideration should be given to the *Transportation Plan For Main Avenue – Route 719* which is a study currently underway to evaluate the Main Avenue corridor and identify operation and multi-modal improvements.
- During the development of alternatives, consideration should be given to existing land use and future development within the study area, particularly on Main Avenue.

We look forward to being involved in the development of this project.

Warm Regards,

KRISTIN HADJSTYLIANOS

Associate Planner, Western Connecticut Council of Governments
tel/fax 475-323-2073 · khadjstylianos@westcog.org

web westcog.org · post 1 Riverside Road, Sandy Hook, CT 06482

From: Francis R. Pickering

Sent: Monday, May 07, 2018 4:30 PM

To: Kristin Hadjstylianos <khadjstylianos@westcog.org>; Jamie Bastian <jbastian@westcog.org>

Subject: Fwd: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

From: Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>

Sent: Monday, May 7, 2018 1:54:25 PM

To: Thompson, Brian; Caiola, Jeff; Jacobson, Rick; Riese, Frederick; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'David_Simmons@fws.gov'; 'tom_chapman@fws.gov'; Morley, Dan D.; Wittchen, Bruce; 'Christopher.Hansen@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; Iozzo, Richard; 'HRilling@norwalkct.org'; Francis R. Pickering; Doyle, Thomas H; Lesay, Kimberly C; Speal, Charles S; Labadia, Catherine; Wisniewski, Marena
Cc: 'mary.mello@dot.gov'; 'leah.sirmin@dot.gov'; 'Coronado, Sergio (FTA)'; 'margason.nathan@epa.gov'; 'timmermann.timothy@epa.gov'; Eberle, John; Fesenmeyer, Andy A.; Livingston, Kenneth; Mojica, Christopher; 'pstanton@fhiplan.com'; Rozanski, Becky

Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hello Everyone,

I'm the ConnDOT Project Engineer for the Route 7/15 Interchange and am working with Andy Fesenmeyer on this project.

As a follow up to Andy's e-mail (below) concerning the review of the updated Draft Purpose and Need Statement (rev. March 21, 2018), I am resending the attachments listed in our earlier e-mail for all to review, requesting comments/ concurrence from all Agencies, **including Agency representatives that were not able to attend our February meeting.**

To date, we have heard back from the FTA Region 1 Office and from the US Environmental Protection Agency. Both Agencies concur with our assessment to eliminate the new section "Existing Infrastructure Conditions" and have no other comments at this time.

Please take a look at the attached Draft Purpose and Need Statement (same as the one sent to you previously) and provide your feedback by **Friday, May 25th** if possible. A version with the tracked changes and Report of Meeting with the edited presentation slides is also attached for reference.

Thank you for your help and feel free to contact me or Andy should you have any questions or need additional information.

Yolanda

Yolanda Antoniak, P.E.

Project Engineer

Conn. Dept. of Transportation

Highway Design Division

Tel.(860) 594-3197

2800 Berlin Turnpike

PO Box 317546

Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky

Sent: Wednesday, April 04, 2018 2:26 PM

To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'

Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov'; 'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'

Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As

mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N5
Meeting Presentations**

August 2022

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration



**Routes 7/15 Interchange
State Project No. 102-358
EA/EIE - DRAFT**

Meeting Presentations

For Meeting Presentations, please see the following link:

[Link to report on Website](#)



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**Environmental Assessment,
Draft Section 4(F) Evaluation and
Environmental Impact Evaluation**

**Appendix N6
Section 106 Consultation**

May 2023

Prepared for:
Connecticut Department of
Transportation Federal Highway
Administration

Appendix N6 - Section 106 Consultation Table of Contents

1. Meeting Minutes	Page
1. Section 106 Mitigation Meeting Minutes, September 29, 2022	5
2. Section 106 Consultation Meeting 2 Minutes, January 15, 2021	11
3. Section 106/Landscape Subcommittee Meeting 3 Minutes, December 16, 2020	17
4. Section 106/Landscape Subcommittee Meeting 2 Minutes, November 21, 2019	22
5. Section 106 Consultation Meeting 1 Minutes, May 7, 2019	29
6. Section 106 Coordination and Cultural PAC Subcommittee (Section 106/Landscape Subcommittee) Meeting 1 Minutes, September 15, 2017	36
2. Project Correspondence	
• National Trust for Historic Preservation MOA signature cover letter, May 5, 2023	42
• Merritt Parkway Conservancy MOA signature cover letter, April 26, 2023	45
• Preservation Connecticut MOA signature cover letter, April 23, 2023	47
• FHWA invitation to Tribal Nations to review draft MOA, November 22, 2022	40
• CTDOT invitation to Consulting Parties to review draft MOA, November 8, 2022	82
• Mashantucket Pequot Tribal Nation/FHWA correspondence regarding Section 106 Mitigation Meeting of 9/29/2022 - October 5-7, 2022 emails, October 27, 2022 letter	115
• FHWA/Mashantucket Pequot Tribal Nation invitation to meet 3/9/2022, May 2, 2022	
• FHWA notification to ACHP of Adverse Effects October 1, 2021	130
• Correspondence from the Mashantucket Pequot Tribal Nation July 29, 2021	391
• Correspondence with CT SHPO re: Merritt Parkway Landscape Assessment Guidelines, May 2021	398
• Correspondence from The Delaware Nation via FHWA, January 20, 2021	402
• Correspondence with CT SHPO re: Section 106 Consultation Meeting #3, December 2020	406
• CT SHPO Project Review Letter, November 20, 2020	409
• FHWA response to ACHP 10/28/2020	414
• CTDOT Evaluation Letter to Consulting Parties, September 21, 2020	421
• Correspondence with CT SHPO re: VIAA and Public Report, August 2020	487
• Route 7/15 PAC Updated: Merritt Parkway Landscape Guidelines 4/23/2020	565
• FHWA invited to review/comment on Phase I/II Cultural Resources Report February 11, 2020	572
• Correspondence with CT SHPO and Consulting Parties re: Public Report, February-March	574
• ACHP Effects Report Review Letter, June 4, 2019	577

STATE PROJECT NO. 102-358 - Route 7/Route 15 Interchange
DRAFT EA-EIE Appendix N6 - Section 106 Consultation

2. Project Correspondence (cont)	
• FHWA Letter to CTDOT Cultural Resources Unit re: Conclusion of tribal consultation, May 27, 2019	581
• CTDOT Consultation initiation letter to SHPO, resending on 5/7/2019	583
• CTDOT Response to ACHP information requests 5/2019 – 1/2020	638
• Tribal Consultation Correspondence, April 2019	643
• CTDOT sends Phase I/II Archaeological/Historic Resources Report for SHPO review, 4/24/2019	645
• Correspondence with Consulting Parties, April 2019	649
• CTSHPO concurs with project's purpose and need statement 5/23/2018	652
• Minutes of 2/28/2018 Agency Coordination Meeting with SHPO	656
• Tribal Consultation Correspondence, December 2017	685
• FHWA Correspondence with Consulting Parties, November 21, 2017	689
• Correspondence with CT SHPO re: initiation of consultation, May 3, 2017	691
• Tribal Consultation Correspondence, April-May 2017	693
• Tribal Consultation Correspondence, March-April 2016	702

Note: Some correspondence includes older versions of reports, appendices or other documents included within the EA-EIE. Please refer to the EA-EIE document and associated appendices for the latest documentation.

Meeting Minutes

Section 106 Mitigation Meeting Minutes
September 29, 2022

ROUTE 7/15 NORWALK - Section 106 Mitigation Meeting Meeting Summary

Date: Thursday, September 29, 2022, at 3:00 PM

Location: Microsoft Teams (virtual)

1. Attendees

Architectural and Historical Services (AHS)

Marguerite Carnell
Meg Harper

Connecticut Department of Transportation (CTDOT)

Cory Atkinson
Kevin Burnham
Kevin Carifa
Mark McMillan
Krishalyn Macrohon
Lynn Murphy
Neil Patel

Consulting Parties

Tod Bryant, Norwalk Preservation Trust
Heather Dunn, NASH
Wes Haynes, Merritt Parkway Conservancy
Diane Jellerette, Norwalk Historical Society
Michael K. Johnson, Mashantucket Pequot Tribal Nation
Alan Kibbe, NASH
Steve Kleppin, City of Norwalk
Betsy Merritt, National Trust
James Quinn, The Mohegan Tribe
Mandy Ranslow, ACHP
Peter Viteretto, CTSLA/Silvermine Community Association
David Westmoreland, Norwalk Historical Commission
Chris Wigren, Preservation Connecticut

Consultant Team

John Eberle, Stantec
Chris Mojica, Stantec
Barbara Wagner, Stantec

Ken Livingston, FHI Studio
Laura Parete, FHI Studio

Federal Highway Administration (FHWA)

David Clarke
Theresa Claxton
Emilie Holland
Kurt Salmoiraghi
Ronan Shortt

State Historic Preservation Office (SHPO)

Jonathan Kinney
Catherine Labadia

2. Presentation Summary

The Connecticut Department of Transportation (CTDOT), in collaboration with the consultant team from Stantec, FHI Studio, and AHS, hosted a 7/15 Norwalk Project Section 106 Mitigation Meeting on Thursday, September 29, 2022, at 3:00 PM via the Microsoft Teams platform. The purpose of the virtual meeting was to provide an update on the project and Section 106 process and initiate discussions on potential mitigation for adverse impacts. Mark McMillan of the CTDOT welcomed attendees to the meeting. Attendees introduced themselves and stated their affiliations.

Ken Livingston of FHI Studio provided an overview of the meeting agenda. M. McMillan explained that this meeting is intended to continue the formal Section 106 Consulting Parties process, confirm findings of the effects, and review the Memorandum of Agreement (MOA). M. McMillan explained that three potential alternatives for the project are under consideration, which include a no-build option and two-build options (Alternative 21D and Alternative 26). Because both of the build alternatives will result in an adverse effect to historic properties, today's meeting will discuss the potential impacts/adverse effects and solicit input from the consulting parties about the possible avoidance, minimization, and mitigation strategies to consider with respect to the historic properties.

John Eberle of Stantec provided an overview of the project's purpose, which is to complete and improve connections, safety, and traffic flow between Route 7, Route 15 (Merritt Parkway), and Main Avenue in Norwalk. J. Eberle gave an overview of the project area, the project's need, the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) process, and the potential alternatives considered for the project.

Marguerite Carnell of AHS discussed the anticipated effects of Alternatives 21D and 26 on cultural and historic resources and eligible archaeological sites. M. McMillan paused to ask attendees if they had questions or comments. Questions and comments are noted later in this document.

M. McMillan provided an overview of the MOA process, including an overview of the roles of consulting parties, signatories, invited signatories, and concurring parties. He presented potential MOA stipulations that are under consideration. M. McMillan paused to ask attendees if they had questions or comments.

M. McMillan explained that Alternative 26 will potentially impact archaeological sites, and if it moves forward, a specific stipulation will be included in the MOA to develop an archaeological treatment plan.

Kevin Burnham of CTDOT discussed the next steps in Environmental Assessment/Environmental Impact Evaluation (EA/EIE) process. He stated that the draft EA/EIE will be available for review in Winter 2022, there will be a public hearing in January 2023, and the EA/EIE will be finalized in February 2023. The project will continue to coordinate with consulting parties, FHWA, SHPO and others.

M. McMillan asked attendees to contact him within the next two weeks with any ideas for MOA stipulation ideas or with any questions about the Section 106 or NEPA processes. M. McMillan thanked attendees for their participation and concluded the meeting at 4:40 pm.

Q&A

Q: Have mitigation measures been determined to protect the archaeological sites?

A: Yes, the project team is considering potential mitigation options, ranging from a data recovery program that would unearth and document the site(s) prior to construction. Other measures could be to preserve the site(s) in place and provide protection against future impacts. A decision has not been made yet and this meeting is to hear the opinions and learn more from the consulting parties. Decisions on which measures to take will be addressed in an archaeological treatment plan.

Q: Where are the archaeological sites located?

A: The archaeological sites are located within the state right of way; however their exact locations are not disclosed in order to protect the resources.

Q: Is information about the sites available? Are they major or minor? Is the impact of the alternatives anticipated to be large or minimal?

A: AHS did a survey and provided an assessment of their findings. They are pre-European contact indigenous people sites. As such, the tribal parties have been invited to provide

information from their perspective on the interpretation of the sites. AHS's survey recommended that the sites are eligible for the National Register of Historic Places.

Q: Have any highly culturally sensitive items been found and if so, is a list of them available?

A: No, there have been ongoing conversations with the THPOS. The survey was conducted within Section 106 guidelines and to the extent that decision could be made: specifically, identifying properties that are recommended to be historically significant., The next step in decision-making will be discussing avoidance, minimization, or mitigation ideas with the consulting parties. That is where today's conversation will be going.

Q: Can the project team provide a ballpark idea of the cost comparison between the alternatives?

A: Alternative 21 D is approximate twice the cost of Alternative 26.

Q: I see a good portion of Area 2 not tested, was that due to conditions on the ground or more of a sampling strategy?

A: Almost all of Area 2 was tested, but due to conditions like rock ledges, parts of it could not be tested.

Q: Will the bridges that are to be replaced be designed in a way that is complementary to the aesthetics of the Merritt Parkway?

A: Yes, but the designs may be different for bridges on the Merritt Parkway versus the Glover Avenue Bridge, which is adjacent to, but not part of the Merritt Parkway. As such, the design of its replacement may be guided by a different aesthetic that reflects its history. Mitigations will be recommended regarding any bridges that are impacted as part of the project.

Q: Would it be possible to get a copy of the Parkway Landscape Assessment Guidelines?

A: Yes, the link has been provided in the chat.

Q: Can you provide more details on the next steps?

A: The project team provided examples of details that might be included in the MOA.

Q: People would want to ensure that the roles of involvement are not limited to concurring parties.

A: The FHWA stated that they will provide a vehicle for people to still be involved in the Section 106 process. CTDOT said that people can be a "concurring party" without signing the MOA. It was explained that the term "concurring party" means that have a signature page on the MOA. Regardless of whether the parties present today wish to be concurring parties, they will continue to be informed and invited to be part of this ongoing process.

Comments

- It is hard to provide input about what should be done about archaeology if people aren't provided more information about the site.
- The Mashantucket Pequot Tribe stated that they want disturbances to the archaeological sites to be minimized to the extent possible.

Section 106 Consultation Meeting 2 Minutes
January 15, 2021



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Section 106 Consultation Meeting (Visual Impacts)

Date/Time: January 15, 2021 10:00 AM

Location: MS Teams Meeting

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Tod	Bryant	tbryant23 [REDACTED]	Norwalk Preservation Trust	Yes
Mike	Calabrese	Michael.Calabrese@ct.gov	CTDOT	Yes
Marguerite	Carnell	MCarnell@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Jeff	Grob	Jeffrey.Grob@stantec.com	Stantec Consulting Services Inc.	Yes
Wes	Haynes	wes@merrittparkway.org	Merritt Parkway Conservancy	Yes
Emilie	Holland	emilie.holland@dot.gov	FHWA	Yes
Jonathan	Kinney	jonathan.kinney@ct.gov	CT SHPO	Yes
Catherine	Labadia	catherine.labadia@ct.gov	CT SHPO	Yes
Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	Yes
Elizabeth	Merritt	emerritt@savingplaces.org	National Trust for Historic Preservation	Yes
Chris	Mojica	Christopher.Mojica@stantec.com	Stantec	Yes
Lynn	Murphy	Lynn.Murphy@ct.gov	CTDOT	Yes

Jenny	Scofield	jenny.scofield@ct.gov	CT SHPO	Yes
Gary	Sorge	gary.sorge@stantec.com	Stantec Consulting Services Inc.	Yes
Sarah	Stokely	sstokely@achp.gov	Advisory Council on Historic Preservation	Yes
Barbara	Wagner	barbara.wagner@stantec.com	Stantec Consulting Services Inc.	Yes
Chris	Wigren	cwigren@preservationct.org	Preservation Connecticut	Yes

Meeting Items

6.1

Topic: GENERAL

Status: Open

Discussion:

Before the meeting commenced, John Eberle (John E.) stated the meeting minutes would be sent to all attendees and the presentation posted to the project website.

Mark McMillan (Mark M.) opened the presentation by welcoming all attendees, reviewing the Teams meeting controls and established the purpose of the meeting as a continuation of the Section 106 Consulting Parties process and to present the visual impacts on historic properties of the project alternatives.

All attendees then introduced themselves and their role with their respective agencies or with the project team.

John E. provided an overview of the project's Purpose and Need as well as a brief review of screening processes that led to the current identification of the two (2) alternatives in the environmental assessment. He presented the specific process and reasons Alternatives 12A and 20B (both identified in the Public Report) were dismissed from further evaluation.

- Betsy Merritt (Betsy M.) asked if the current missing movements between Route 7 and 15 (identified in the missing movement diagram slide) were ever constructed in the past? John E. confirmed that they were never constructed.
- Sarah Stokely (Sarah S.) asked whether the Level 2 Screening criterion D (Integrating Project Roadways into Environment Context) slide included visual impacts? John E. responded that it addressed complexity and footprint impact areas of the alternatives and so did indirectly include visual impacts.

John E. then presented the 3D Design Visualization models for the two (2) remaining alternatives (21D and 26) walking through the existing missing connections and how each alternative made the

connections in very different ways and with very different footprints. Gary Sorge (Gary S.) noted that the model reflects a substantial area on Alt 26 that can be reclaimed as landscape buffer.

Marguerite Carnell (Marguerite C.) then presented the Effects on Historic Resources to above ground resources (Merritt Parkway bridges, Area Historic Districts, Individual Historic Resources)

- Tod Bryant (Tod B.) suggested that he thought the key resource in the project corridor is the Main Avenue bridge as it is iconic and defines the Parkway. He asked what treatments will be proposed when we discuss a complete replacement for the bridge? The team responded that this will be one of the key elements of design and that aesthetic treatments will be at the forefront though specifics are unknown at this early point. Tod B. stated that it was important that the new Main Avenue Bridge 'look' is not a shock to the viewer. Mark M. suggested that while it is too early to get into specifics, since there will be an adverse effect (regardless of which alternative is selected), there will likely be a stipulation under the MOA to address a sympathetic design for this treatment.
- Betsy M. followed up on Tod B.'s question by inquiring as to the need in replacing the bridge: was it due to widening? John E. responded that in order for the purpose of the project to be realized, roadway widening is required for traffic flow improvements thus impacting the bridge. Andy Fesenmeyer (Andy F.) also stated that the bridge is currently substandard due to vertical clearance requirements. Betsy M. asked what was the difference in vertical height between the proposed bridge vs. the existing one? John E. suggested it was on the order of 1 ft.
- Jenny Scofield (Jenny S.) asked whether there was to be any temporary or permanent change to vegetation between the Parkway and the Verneur Pratt Historic District (VPHD)? Marguerite C. suggested that given the distance between the Parkway and VPHD, there would not be an impact. John E. also suggested that as the limits of construction for either alternative did not extend far beyond current pavement boundaries and that land between the Parkway and the VPHD was private, there should not be an impact. John E. also presented the 3D model identifying the VPHD and showing how proposed conditions did not impact the significant vegetation buffer between VPHD and Parkway.

Gary S. then presented historical background and current conditions and opportunities for the Merritt Parkway (Parkway) designed landscape, focusing on five (5) observation points along the Parkway in the project corridor. The observation points were chosen as they provide good examples and were representative of Parkway landscape features in the project corridor.

Gary S./John E. then reintroduced the 3D model to show a number of key Parkway features (rock outcrops, views of the Norwalk River and MNRR, Main Avenue bridge area conditions and opportunities) and the key visual impact differences on these features between the two alternatives (21D and 26) under consideration.

Mark M. closed the presentation with general next steps and schedules involving the EA, Section 106 and the (MOA). He then opened up the meeting for further questions or discussion.

Discussion:

Sarah S. thought that the Silvermine Historic District was part of the project area and was subject to possible effects, and asked why it was not in the APE. Mark M. responded that because of distance, topography and undisturbed vegetation buffers, Silvermine was effectively screened from the APE. Jenny S. added that in the original Public Report that SHPO reviewed, there was a concern about Silvermine. They (SHPO) asked the team to better explain the boundary of the APE because the first set of reports had based it off of visual analysis SHPO had not seen. Given the better defining of the

APE and associated visual analysis, Jenny S. confirmed that SHPO is comfortable leaving Silvermine out of the APE.

To the previous point, TB added that one of the reason that Silvermine HD was discussed in past projects was that previous incarnations of this project had more extensive impacts to adjacent areas.

Jenny S. asked whether there was a timeframe of the development of the landscape management plan (separate project with CTDOT) that this project might rely on. Mark M. suggested he did not know specifics but that Mike Calabrese (Mike C.) might. Mark M. suggested it's roughly concurrent but 7/15 could start construction before. Mark M. to follow up with Mike C. and get back to Jenny S. . Jenny S. hopes the landscape management plan would be in place prior to this project.

Tod B. asked whether there was a cultural landscape report for the Parkway or for this area to work off of for future landscape plans? Mark M. responded that there is a chapter in the EA document that also addresses the cultural landscape. He also suggested there are efforts underway that address landscape improvements unrelated to this project (CTDOT Vegetation Management Plan; a specific protocol for evaluating health/viability of trees in the median of the Parkway, e.g.).

Chris Wigren (Chris W.) suggested that Main Avenue (and other interchanges) are the 'front doors' of the Parkway. He suggested that people crossing the Parkway at this and various other points (e.g. Route 7 and Perry Avenue) get a sense of the historic landscape and roadway importance.

Wes Haynes (Wes H.) asked if these various elements (historic property effects) will also be reviewed under NEPA under a separate process? He asked if someone might elaborate on the NEPA vs. Section 106 processes. He noted that in terms of NEPA, the Parkway is designated a Scenic Parkway. Mark M. stated that yes, these elements are also addressed in the NEPA process, that NEPA strikes a balance between benefits of improvements and impacts said improvements have on the natural, social, and built-environment. While Section 106 addresses impacts a project may have specifically on historic properties, NEPA takes a broader view and examines historic properties along with environmental aspects like visual/aesthetic character, water and air quality, and changes in noise levels. There is some overlap between these environments (visual and historic properties, e.g.) but in the end, evaluation of potential impacts to all of these environments are analyzed together and documented in the NEPA Draft EA.

Betsy M. asked whether the EA/EIE will include 4(f) assessment? Mark M. responded that a 4(f) evaluation of the alternatives is underway. He suggested we have a discrete list of adverse effects under Section 106 that will relate to 4(f), but that the effects vary slightly between the alternatives. A preferred alternative will need to be selected before the 4(f) evaluation can be finalized.

Betsy M. stated that it seems to her that on the face of it (including reviewing the documentation in the Public Report), that Alt 26 is the better option, since it is less impactful due to its smaller footprint. She also asked about mitigation and the MOA for replaced bridges and wants to be part of that discussion. She stated that this meeting and the presentation has been helpful in visualizing the proposals and looks forward to further MOA dialogue. Mark M. confirmed that the details of the MOA will closely relate to the selected alternatives and that all Consulting Parties (CP's) will be invited to participate in the MOA.

Sarah S. suggested it would be helpful for Mark M. to explain what step of the 106 process we are in, suggesting it appears the project is in Step 3 (Mark M. confirmed). She stated that the reports are well done but she still needs to read through and connect the pieces. Sarah S. added that this meeting was important as it gave her an opportunity to hear from SHPO and other CPs on the significant aspects of the project (landscape, Main Avenue, archeological sites). She inquired as to whether a 'final' effects report was planned as that would be helpful to CP's. Mark M. suggested that while there would likely be a follow-up letter to the CP's regarding the preferred alternative, but unless the CP's

had any comments that would substantially change the effects recommendations, no final effects report was envisioned. Next steps will be identifying the preferred alternative, continuing consultation with the CP's and tailoring mitigation strategies based on the impacts of the preferred alternative. He also stated that this assessment information would be shared with the PAC at the next meeting.

Sarah S. requested that a consultation schedule be developed identifying timelines, meetings, deliverables so that CP's are aware of potential consultation meetings and follow up. She strongly suggested a follow-up to today's meeting be held. Mark M. stated he will put a schedule together and distribute.

Sarah S. asked whether other effects (traffic, noise, air etc.) were a concern with regard to historic districts? Was there a report completed to address these? Andy F. responded that the draft EA/EIE (in development) addresses these aspects and will eventually be distributed to all parties.

Sarah S. stated that she felt the presentation was very beneficial to help her visualize the project proposals. Wes H., Tod B. and Chris W. all concurred. Jenny S. added that the 3D model is a great tool to understand the varying perspectives.

Sarah S. asked if CTDOT received significant comments from CP's on these alternatives. Mark M. stated that he sent out the Public Report and Section 106 materials but got very little comment and no objections. Sarah S. asked if he still would accept comments and Mark M. stated yes, though we are looking to close the comment period formally

John E. ended the meeting by again stating that the Report of Meeting would be distributed to all and the presentation posted to the project website in the coming weeks.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Section 106/Landscape Subcommittee
Meeting 3 Minutes
December 16, 2020



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: PAC Landscape-Section 106 Subcommittee Meeting #2

Date: December 16, 2020

Location: MS Teams Meeting

Prepared By: Eberle, John

The Followings Meeting Minutes have been reviewed and approved by:

Reviewed by:

Yolanda Antoniak January 20, 2021

Approved by:

Andy Fesenmeyer January 20, 2021



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: PAC Section 106/Landscape Subcommittee Meeting 3

Date/Time: December 16, 2020 01:00 PM

Location: MS Teams Meeting

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Drew	Berndlmaier	Dberndlmaier@norwalkct.org	City of Norwalk	Yes
Tod	Bryant	[REDACTED]	Norwalk Preservation Trust	Yes
Mike	Calabrese	Michael.Calabrese@ct.gov	CTDOT	Yes
Marguerite	Carnell	MCarnell@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Wes	Haynes	wes@merrittparkway.org	Merritt Parkway Conservancy	Yes
Emilie	Holland	emilie.holland@dot.gov	FHWA	Yes
Alan	Kibbe	[REDACTED]	NASH	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
JoAnn	McGrath	jmcgrath@marcuspartners.com	Marcus Properties	Yes
Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	Yes
Marcy	Miller	mmiller@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes

Chris	Mojica	Christopher.Mojica@stantec.com	Stantec	Yes
Lynn	Murphy	Lynn.Murphy@ct.gov	CTDOT	Yes
Gary	Sorge	gary.sorge@stantec.com	Stantec Consulting Services Inc.	Yes
Peter	Viteretto	viteretto@heritagelandscares.com	CT ASLA	Yes
Chris	Wigren	cwigren@preservationct.org	Preservation Connecticut	Yes
Mike	Yeosock	myeosock@norwalkct.org	City of Norwalk	Yes

Meeting Items

3.1

Topic: GENERAL

Status: Open

Discussion:

Ken Livingston (FHI) provided an introduction to the meeting and reviewed controls of Microsoft Teams for attendees. He noted the purpose of the meeting as an update on Section 106 activities with a focus on reviewing mitigation of unavoidable adverse effects and the Memorandum of Agreement (MOA) process.

Marcy Miller (FHI) provided a roll call of attendees.

The presentation then proceeded (presentation is posted to project website):

Andy Fesenmeyer (CTDOT) gave a brief recap of Section 106 activities, providing a recap from the first meeting in May 2019, incorporating comments from SHPO into the updated Public Report up to the current work in developing the MOA.

Marguerite Carnell (AHS) provided a review of SHPO comments on, and subsequent minor changes to, the Public Report. These focused on slight refinement of the APE boundary and evaluation of additional historic period resources (no additional adverse impacts were found).

Mark McMillan (CTDOT) then described the overall purpose and process for developing an MOA and stipulations to compensate for adverse effects on historic properties.

He continued, outlining some of the initial stipulations being considered for the 7-15 project, emphasizing that these were simply the initial thoughts and there could be changes.

Mark concluded his section by giving the overall next steps in the MOA process including Consulting Parties being invited to participate in the MOA process, continuing feedback from FHWA, SHPO and ending with a signed MOA that is filed with Advisory Council of Historic Preservation (ACHP).

Andy Fesenmeyer concluded the presentation discussing next steps in EA process with an anticipated finalized EA document (and selection of the preferred alternative) in Spring/Summer of 2021.

John Eberle (Stantec) noted that today was not the only day to be a part of the process. There will be additional opportunities in the future as the process moves along.

PAC Subcommittee Comments/Questions

Both Todd Bryant and Chris Wigren noted that they did not see their respective organizations (Norwalk Preservation Trust and Preservation Connecticut) listed in the consulting parties slide.

Team responded that the slide was just a sampling of Consulting Parties (CP's) for graphic effect. Both organizations (and others) are on the official listing of CP's.

Peter Viteretto stated that he has been identified as part of the Silvermine neighborhood group, and while accurate, he also represents CT ASLA and suggested they should be on the list of consulting parties. He will reach out to Mark to confirm.

Chris Wigren asked that given the effects of COVID on state/federal revenues, where does this project lie in DOT's larger priorities for transportation needs around the state?

Andy Fesenmeyer responded that the project is well funded through design. Currently, it is not programmed for construction.

Wes Haynes stated that the Merritt Parkway Conservancy (MPC) board is going to meet in a week or so to review the two current alternatives again. Will this PPT be available for review at that time?

Ken Livingston responded that the presentation and full recording will be available on the project website shortly. He noted that the slide that incorrectly identified alternatives still being considered, would be edited to reflect the current alts (21D and 26).

Mark McMillan stated that it is also important to keep in mind if you (MPC) are discussing the initial stipulations, that we're very early on in the process. While these are ideas, this is not a 'set in stone' list as we identify the preferred alternative and mitigate appropriately to the specific alternative. Stipulations will also be dependent on comments from signatory parties and CPs.

Meeting adjourned at 1:40PM.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Section 106/Landscape Subcommittee
Meeting 2 Minutes
November 21, 2019



Route 7-15 Norwalk

Route 7 - 15 Interchange
State Proj. No. 102-358
Subject: PAC Landscape Subcommittee Meeting #2
Date/Time: November 21, 2019 01:30 PM
Location: Fodor Farm, Norwalk, CT

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Drew	Berndlmaier	Dberndlmaier@norwalkct.org	City of Norwalk	Yes
Mike	Calabrese	Michael.Calabrese@ct.gov	CTDOT	Yes
Marguerite	Carnell	MCarnell@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Wes	Haynes	wes@merrittparkway.org	Merritt Parkway Conservancy	Yes
Lydia	Henson	lhenson@empirestaterealtytrust.com	Empire State Realty Trust, Inc	Yes
Jo-Anne	Horvath	dahorvath@att.net	Creeping Hemlock	Yes
Alan	Kibbe	akibbe@att.net	NASH	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
JoAnn	McGrath	jmcgrath@marcuspartners.com	Marcus Properties	Yes

Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	Yes
Nancy	Rosett	n_rosett@yahoo.com	Norwalk Bike Walk Commission	Yes
Gary	Sorge	gary.sorge@stantec.com	Stantec Consulting Services Inc.	Yes
Ariana	Vera	avera@westcog.org	Western Connecticut Council of Governments (WestCOG)	Yes
Matt	Verry	Matthew.Verry@ct.gov	CTDOT	Yes
Peter	Viteretto	viteretto@heritagelandscapes.com	CT ASLA	Yes
Chris	Wigren	cwigren@cttrust.org	Connecticut Historical Trust	Yes

Meeting Items

10.1

Topic: PROJECT MANAGEMENT/MEETINGS/PUBLIC OUTREACH

Status: Open

Discussion:

Yolanda Antoniak of the CTDOT, welcomed the attendees to the meeting. She presented the overall purpose of the meeting and reviewed the agenda. The purpose of the meeting was to:

- Review revisions to Phase I/II Cultural Resources Public Report
- Discuss methodology/ criteria for landscape assessment within the Environmental Document and subsequent design of the preferred alternative.

Yolanda referenced the September 2018 Landscape Subcommittee and Public Landscape Workshop, which provided valuable insights for our work and has been used as a starting point for much of this meeting's discussion.

Marguerite Carnell of AHS was introduced to speak about the revisions to the Phase I/II Cultural Resources Public Report. Based on the comments received during the May Section 106 Consulting Parties meeting and additional comments received, the Report was updated to include a more detailed discussion of the development of the Visual impact Assessment Area (VIAA) and Area of Potential Effects (APE). The additional details were based on a desktop review of the project areas, visual character, key views and viewpoints from various viewers perspectives (e.g. residents, commuters, etc.). The work was conducted in conformance with FHWA guidelines for the visual assessment of highway projects.

AHS also addressed a question about the potential for indirect effects on historic districts that are located outside the APE: at this stage of the design, those impacts have not yet been determined. When additional

technical studies are completed, it's possible that the APE could be enlarged if any of those indirect impacts will extend beyond the current boundaries of the APE. AHS did assess potential vibration impacts and have determined there will be no effects on any of the historic districts.

Marguerite also clarified the National Register status of the Silvermine Avenue Historic District. This Historic District has been approved for National Register study by the State Historic Preservation Office (SHPO) and that nomination is currently in progress.

She stated that stakeholders asked for a more detailed discussion of the integrity of the Parkway's landscape elements, which have changed over time. AHS expanded the report to include eight historic character-defining features which may help to inform the assessment criteria of design alternatives: roadway width, alignment, views, bridges, medians and verges, plantings, signage, and guiderails.

Gary Sorge of Stantec, was then introduced to present an overview of the process to develop a set of Landscape Assessment criteria that will be used in the environmental document and subsequent design of the preferred alternative. He gave an overview of the development of the draft criteria. This included a review of existing documents such as the 1994 Merritt Parkway Master Plan (highlighting key words and identifying them as being incorporated into our adapted assessment criteria), National Park Service criteria for scenic parkways, CTDOT maintenance and design guidelines, and a review of comments from the September 2018 Public Landscape Workshop.

He stated that this project area is unique and over time, the section of the Merritt Parkway within the project area has been aesthetically diminished and is not a good representation of the Merritt Parkway design features. In the project area, there is a more commercial and overall developed feel than most of the Parkway. He stated we want to develop a criteria assessment that recognizes the uniqueness of this project area. He stressed the importance of considering the Merritt Parkway as "an experience" to drivers, passengers, residents of the surrounding area. He stated that the overall goal of the project is not to recreate the Parkway at its peak in the 50's, 60's (as stated in 1994 Master Plan goals), but to identify feasible rehabilitation actions.

Peter V. commented that the Merritt Parkway Master Plan is not a cultural landscape report and therefore has no historical basis.

Gary then asked the PAC Subcommittee whether they were comfortable with our approach to developing criteria, namely of using the previously discussed guidelines (1994 Merritt Parkway Master Plan, National Park Service criteria for scenic parkways, CTDOT maintenance and design guidelines) as a 'starting' point for assessment criteria but updating to address current conditions and develop a modern day assessment. The PAC Subcommittee concurred.

Gary then presented a series of photographs from the project area, identifying positive and negative attributes of the current landscape conditions (e.g. lack of buffers as a negative attribute, certain land forms and hills as a positive attribute).

Gary then introduced the landscape evaluation criteria matrix. He described the overall approach that led to the development of the matrix.

A set of general comments and questions followed.

Comment: Consider two additional criteria: Circulation as its own category (area roadways are curved and historically narrow but not fenced and define the roadway section) and Rehabilitation (enhance existing landscape features/heal "scars" of past construction activities). There is a need to integrate the "engineering" hardscape into the natural landscape.

Gary then led a discussion of each specific category and assessment criteria, reiterating that the assessment criteria is to provide for an evaluation of the alternatives in the EA and to apply later as a design tool:

Views

Gary S. noted spatial organization is key, understanding the park-like and pastoral feel of Merritt Parkway. He stated that the Parkway experience can and should begin on access ramps (i.e. ramps should reflect Parkway character)

Comment: We need opportunities to see the landscape and have views of the Norwalk River from Merritt Parkway and Glover Avenue. Need to consider the sense of visual permeability, e.g. open parapets.

Comment: The view coming from Westport is pastoral, an open, grassy landscape with a view of an intersection; intent should be to maintain and rehabilitate a visually cohesive, consistent landscape. See historical photos that depict open landscape with young plantings. The bridges are "tucked in" without "big frames." The bridges and topography are complementary.

Q: Is the Project Team considering views of Merritt Parkway and Norwalk River from adjacent buildings?

A: Yes, to the extent possible.

Vegetation and planting design

Chris W. emphasized the term "naturalistic" for plantings, intended to blend in with the natural landscape.

Peter V. emphasized the contrast and features of the median vs perimeter of understory as a place for flowering trees and the need to preserve buffer and woodlands only if they're valuable. He suggested that the plantings review should consider opening views where they are significant.

Peter V. suggested buffers and woodlands need to be preserved and views/visual resources can take priority over compromised/less valuable areas.

Q: How is the staging area currently located near the Stop & Shop property, incorporated into this Project?

A: Andy Fesenmeyer of the CTDOT replied that it's used as a staging area for multiple projects and will be discontinued as a staging area upon their completion. The area will be landscaped as part of this project.

Topography

Gary S. noted that the Parkway is typically at a higher grade than adjacent areas and mentioned the challenge of treating steep slopes on the Merritt Parkway which we cannot change.

Chris W. noted that in many areas grading was an 'engineered' design and not consistent with Parkway landscape intent. "Those areas were criticized by Merritt Parkway landscape architects".

Peter V. noted some of these areas are planted heavily with pines. He also suggested that the transition slopes along with grading higher than the Parkway were important considerations. He stated that some areas could be fixed while others may not be.

Amenities

Gary stated that the project area consisted of a lot of 'fix-it' projects and lacked a consistent 'theme', especially as it relates to access and egress ramps.

Gary S. advocated for extending Merritt Parkway style guiderails and sign types to ramps. He reiterated that the Parkway experience can and should begin on access and egress ramps.

Chris W. suggested a goal to de-clutter critical areas near the on- and off-ramps.

Peter V. noted the requirement for separating the Parkway from pedestrians. He hopes this can be handled with naturalized features instead of fencing. "We should avoid 6-foot chain-link fences, which collect invasive species."

Sustainability

Joanne H. mentioned the maintenance of the Parkway is of utmost importance, that while in the first year after construction the landscape might all look good, years later it is in need of work.

Peter V. also stated that consideration should be given to the sustainability of trees, etc. and suggested sufficient soil (3-5 feet deep) is necessary to allow for optimum growth.

Natural Features

Q: Joanne H. asked if the Project Team will try to "expose" bridges.

A: Yes, if it makes sense to highlight distinct features. We would also look to remove invasive species that have grown over some of the bridges.

Peter V. noted we should address "damage", such as out-of-scale raw rock outcroppings that currently exist in the Project Area, or other 'scars' that need to be healed.

Mark McMillan of the CTDOT emphasized that these criteria will help us evaluate the two alternatives, which is part of the NEPA process. He suggested perhaps there are other questions to ask, e.g., which alternative provides a better opportunity for healing landscape scars?

Safety

Gary S. noted the potential need for more signage based on having more connections/roadway options. Peter V. stressed improving geometry and visibility, creating clear sightlines to enhance safety. Peter stated he would provide the Project Team with additional comments by email. The landscape design should help to provide a less confusing interchange area for user experience/movement through the Project Area.

Peter V. noted that stormwater detention areas must be thoughtfully designed and attractive (integrate engineering & landscape design).

Joanne Horvath agreed safety is important, including for DOT workers.

Gary S. mentioned the need to consider how is landscape reinforcing/providing more clarity for motorists making choices? We should keep the design elements simple and reduce visual clutter for better driver decision making.

Andy Fesenmeyer then closed the meeting by discussing the next steps:

- Finalizing the Phase I/II report
- Continuing interagency coordination
- Complete Draft Environmental Document- early 2020
- Hold Public Hearing- Spring 2020
- Finalize Environmental Document-Summer 2020
- Select Preferred Alternative Summer 2020
- Begin design, using selected/edited criteria

John E. stated that the comments and edits received today would be incorporated and a final assessment criteria table provided all for their use.



November 21, 2019

PAC Landscape Subcommittee Meeting #2 10

Page 6 of 10

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	------------	-------------	--------	----------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Section 106 Consultation Meeting 1 Minutes
May 7, 2019



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Section 106 Consultation Meeting 1

Date/Time: May 7, 2019 10:00 AM

Location: Norwalk City Hall- Room 101

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Jim	Cameron	jim@mediatrainer.tv	Merritt Parkway Conservancy	Yes
Marguerite	Carnell	MCarnell@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Bruce	Clouette	clouette@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Joel	Davis	[REDACTED]	Merritt Parkway Trail Alliance	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Leigh	Grant	[REDACTED]	NASH/MPC	Yes
Meg	Harper	mharper@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Wes	Haynes	wes@merrittparkway.org	Merritt Parkway Conservancy	Yes
Emilie	Holland	emilie.holland@dot.gov	FHWA	Yes
Catherine	Labadia	catherine.labadia@ct.gov	CT SHPO	Yes
Dave	Leslie	dleslie@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes

George	Maranis	piano888@optonline.net	Merritt Parkway Conservancy	Yes
Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	Yes
Elizabeth	Merritt	emerritt@savingplaces.org	National Trust for Historic Preservation	Yes
Scott	Speal	Charles.Speal@ct.gov	CTDOT	Yes
Sarah	Stokely	sstokely@achp.gov	Advisory Council on Historic Preservation	Yes
Emily	Valentino	Emily.Valentino@stantec.com	Stantec Consulting Services Inc.	Yes
Ariana	Vera	avera@westcog.org	Western Connecticut Council of Governments (WestCOG)	Yes
Peter	Viteretto	viteretto@heritagelands.com	CT ASLA	Yes
Chris	Wigren	cwigren@cttrust.org	Connecticut Historical Trust	Yes

Meeting Items

1.1

Topic: PROJECT MANAGEMENT/MEETINGS/PUBLIC OUTREACH
 Open

Status:

Discussion:

Andy Fesenmeyer (CTDOT) provided an introduction to the meeting and an overview of the project. Mark McMillan (CTDOT) then provided a background summary on the Section 106 Consultation Process and the Federal regulations related to the process. John Eberle (Stantec) provided an update on the overall project status and current state of alternatives under consideration.

Marguerite Carnell (AHS) presented an overview of the above-ground cultural resources within and near the Area of Potential Effect (APE). These include historic districts, historic bridges and the Merritt Parkway itself. Marguerite then presented a table of potential impacts to above-ground cultural resources based on the current four alternatives. David Leslie (AHS) then presented an overview of the archaeological resources in the APE. He presented the findings of

the Phase 1 and 2 archaeological investigations. David then presented a table of potential impacts to archaeological resources based on the current four alternatives.

A discussion and series of Questions and Answers then followed based on the presentation.

Comment: Peter Vittereto (CT ASLA) noted that the report provided references to the 'structural' aspects of the corridor but there should also be a consideration of how the alternatives will impact the landscape from a green space perspective, meaning, will the alternatives provide space to improve, enhance or mitigate impacts to the landscape.

Q: How close will the ramps be to the back of the 114 Perry Avenue property?

A: The ramps are unlikely to be visible or have a negative impact on the property. If visible, they would be only marginally more intrusive than the current interchange and power lines. Additionally, the setting of the property is defined more by the landscape along Perry Avenue than by the view eastward toward the rear of the property.

Comment: The summary chart (page 14) appears to contradict the text (page 33) in the report.

Response: The summary chart is accurate and the project team will review and correct the text in the report.

Q: In regard to the archaeological sites how are impacts and mitigation being evaluated:

A: The impacts and mitigation are identified under Criteria D (Information Potential) eligibility.

Q: Will you provide a copy of the PowerPoint?

A: Yes.

Comment: The APE appears to be restrictive on adjacent properties and potential impacts but further review of project graphics/reports will be done. Has SHPO/others been consulted on the APE?

Response: The project team has generally coordinated the project and associated boundaries with agencies, FHWA and SHPO, including meetings where general APE depictions and Purpose and Need Statements were discussed.

Q: Could you clarify the differences between the current alternatives and the prior considered alternative that was subject to the lawsuit?

A: Alternatives 20B, 21D and 26 do not have the elevated ramps that were a component of the alternative that was the subject of the lawsuit. Alternative 12A does have the elevated ramps but still meets the Purpose and Need, so it has made it through the Level 1 screening process. Of the three alternatives with lower ramps, 26 is a completely new alternative. The other two, along with 12A were considered under the prior NEPA process. The project team can provide support documents to allow comparison of the alternatives' concepts.

Q: Is there a cultural landscape report for the Merritt Parkway? How will impacts be considered to the overall landscape of the Parkway? Recommend performing some inventory of conditions.

A: There is no specific cultural landscape report for the Merritt Parkway. There is the Merritt Parkway Master Landscape Plan, but that outlines general guidelines and not specific conditions in the project corridor.

Comment: Could and should a landscape report and understanding of setting be developed for this project?

Q: Can you provide graphics depicting ramp heights and perspectives from different areas?

A: The project team has developed a 3D model that presents the alternatives. The project team will share the basic model and snapshots from various perspectives. If there are additional perspectives desired, the project team can develop them. Additionally, at this point, the alternatives are still at a conceptual level, and specific impacts and potential mitigation will occur later in the process.

Comment: We still need to document the landscape features that exist and should be preserved or enhanced.

Q: What about the opportunities for character improvements to the Parkway?

A: At this point, we still need to hear what we are missing from the current setting/existing conditions.

Comment: Can we update the current condition to meet the original design plan of the Parkway?

Q: In regard to archaeology, do any of the impacts potentially delay construction, specifically Alternative 26? What are the options for mitigation?

A: The impacts will require further investigations through excavation and data recovery. The value of the resources is in the information they may present, not in their specific setting. The

mitigation would not significantly delay any alternative. Tribes have not suggested that the areas shown are sacred. If Alternative 26 is selected the artifacts can be recovered with the understanding that it is a cost issue. There are no visual impacts to the public.

Q: What is the difference between the provided and referenced "Phase I/II Public Report" vs. any report or analysis that won't be made public?

A: While the public report provided to all representatives for this meeting will be posted for general public review on the project website, there are specific data and archaeological resource locations in the more specific Phase II testing report that will not be released to the public. This is to avoid providing locations and access to any finds to avoid public disturbance of same.

Andy Fesenmeyer closed the formal presentation with a review of the project schedule. Additional discussion and questions followed.

Comment: Can you include in the report a section on how the APE was developed and the viewshed analysis methodology?

Q: Is the no-build still under consideration?

A: Yes, the no-build will be carried into the environmental review process. That said, the no-build does not meet the Purpose and Need of the project.

Q: Do you have costs for the alternatives?

A: We do not have specific costs at this point. We can say Alternatives 20B and 21D have approximately twice as many structures as Alternative 26. The project overall is only funded through design. Detail costs will be developed during the design process.

Q: Will landscape character be considered in evaluating the alternatives?

A: Landscape characteristics will be considered within the environmental documentation and eventual design process and may also be considered during the Level 2 screening process. This will be a discussion point at an upcoming Project Advisory Committee (PAC) meeting.

Q: Is there a point where cost cancels out need?

A: From the NEPA side, the no-build is always evaluated, and we can consider overall costs as part of the evaluation process, including long-term maintenance costs. As part of the evaluation, the team is looking at "are the improvements and impacts worth the costs?"

Q: National Trust asked if the Purpose and Need document can be provided?

A: The document is on the project website but will also be provided.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Section 106/Landscape Subcommittee
Meeting 1 Minutes
September 15, 2017



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: 7/15 Norwalk- 106 Coordination and Cultural PAC Subcommittee Meeting 1

Date/Time: September 15, 2017 10:00 AM

Location: Fodor Farm, 328 Flax Hill Rd, Norwalk, CT 06854

Attendees:

First Name	Last Name	Email	Company	Attended
		yolanda.antoniak@ct.gov		Yes
Richard	Armstrong	Richard.Armstrong@ct.gov	CTDOT	No
Stephanie	Brooks	sbrooks@fhiplan.com	Fitzgerald & Halliday, Inc.	No
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	No
Meg	Harper	mharper@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Dave	Leslie	dleslie@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Lee	Levey	[REDACTED]	Norwalk Preservation Trust	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
JoAnn	McGrath	jmcgrath@marcuspartners.com	Marcus Properties	Yes
Mark	McMillan	Mark.McMillan@ct.gov	CTDOT	No
Jill	Smyth	jill@merrittparkway.org	Merritt Parkway Conservancy	Yes
Stacey	Vairo	svairo@ahs-inc.biz	Archaeological and Historical Services, Inc.	Yes
Peter	Viteretto	viteretto@heritagelands.com	CT ASLA	Yes

Meeting Items**1.1**

Topic: PROJECT MANAGEMENT/MEETINGS/PUBLIC OUTREACH
Open

Status:

Discussion:

Yolanda Antoniak provided a brief introduction of the meeting's purpose. Meeting introductions then occurred.

Stacey Vairo provided a presentation of the 106 and 4(f) process and the current work effort. Following the presentation, a discussion occurred. Presented below is a summary of the discussion.

Q: Jill S. asked- How much longer before alternates are further defined?

A: Within the next few months the two existing alternates and any additional alternatives identified during the scoping process will further refined with the intent to present to the PAC and public in early 2018.

Q: Peter V. asked- Will designs look at "pre-Route 7 expressway" landscape?

A: The project team will consider the overall landscape and context of the project area with an intent of restoring the landscape to the extent possible within the alternates.

Peter V. - stated that he wanted to know how the Stantec design team defined the character of the Parkway. John E. said that the Parkway's character is key to the project purpose and need and Peter said he was asking something very specific. He wanted the design team to demonstrate to him that they had an understanding of the Federal Guidelines for the Treatment of Cultural Landscapes. Specifically, spatial organization and land patterns, as well as character-defining features such as topography, vegetation, circulation, water features, structures, furnishings, and objects. The focus should be less on the hardscape than the greenspace because that is what makes the experience more pleasant for the driver. This particular area (the project area) is a gateway to the city, and despite the development that has taken place the landscape has to take prominence. The first phase of this project did some major damage, and it has not been repaired. Any attempts at plantings have not been in line with the philosophy of W. Thayer Chase who repaired the destruction caused by the hardscapes through the use of carefully chosen native plantings. He followed the Olmsted idea of a naturalistic influence rather than corporate-type plantings.

Lee Levey noted that the previous project and others had had an incremental impact on adjacent neighborhoods as well - particularly Silvermine. What began as a rural farming community and manufacturing community retained a lot of that character until very recently when the southern and eastern boundaries were pushed back on by development. Both by the high-density development that has taken place in the project area and by DOT with the transportation projects in the area.

Mt. Levey noted that the current Norwalk River Bridge project is also having an impact on a location near the State Armory - where construction vehicles are going to be housed. He also stated that the Main Avenue interchanges are poorly planned, and traffic controls result in high accident rates. These situations all result in people avoiding those areas. As a result, they force traffic onto smaller Silvermine streets.

Peter V. and Mr. Levey agreed that what was once a rustic wooded landscape that attracted artists has lost the woodland buffer that protected it from the project area. This was lost as a result of Route 7 and the high-tension power lines that run west of the roadway. Along the Merritt there is only a 90-foot buffer in some area when at least 1,200-foot buffer is needed to support wildlife and dampen noise. North of Main Avenue there is a huge gap in the landscape and plantings entirely.

Mr. Levey and Peter V. also noted that the Perry Avenue Bridge area changed dramatically with the installation of the two flyover ramps on either side of that Bridge. They also brought up the Grist Mill intersection of local roads and Super 7 - it had a large impact on the character of the area, but it never functioned properly - and again there are always accidents in the area.

The aspect of lighting was also brought up - both on the Parkway and in the adjacent residential neighborhoods like Silvermine. Basically, there is little to no lighting in these areas (including along the Merritt) and variable message signs, lights and other utilities all add to the cumulative impacts on these historic resources.

Peter V. noted that anything that can be done to pare back the damage caused by the creation of Super 7 would be an improvement particularly improving the buffer. He said that this project might provide an opportunity to truly improve the interchange for the first time through the use of landscape.

Mr. Levey noted that in relation to the Norwalk River and water in and around the project area - the Merritt and Glover Avenue both have a relationship to the water. Following the flood of 1955, the Norwalk River was contained within a concrete trough. There have been plans to remove it from this and to get rid of a Flock Process Dam.

Peter V. said that the views approaching and coming away from the Merritt Parkway looking toward and from it- in addition to the viewsheds around bridges are valuable - how do we control these views? The previous guidance such as the Guidelines and Landscape Master

plan were outdated according to Jill and Peter, and there is now a new way of looking at cultural landscapes and the landscape in and around the Merritt.

1.2

Topic: PROJECT MANAGEMENT/MEETINGS/PUBLIC OUTREACH
Open

Status:

Discussion:

JE suggested that given at least some of the discussion today, that it seemed worthwhile that a separate 'landscape subcommittee' be formed to address those critical issues as we move forward. All agreed.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
------	-------------	---------	----------	--------	-------------

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Project Correspondence

National Trust for Historic Preservation
MOA Signature Cover Letter
May 5, 2023



National Trust *for*
Historic Preservation®

May 5, 2023

Mark J. McMillan
Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

Re: Section 106 MOA for Route 7/15 Merritt Parkway Interchange Project

Dear Mr. McMillan,

The National Trust for Historic Preservation has appreciated the opportunity to participate as a consulting party in the long-standing effort to develop an acceptable interchange plan for the Merritt Parkway's crossing of Route 7, following the federal court's rejection of the earlier proposal for failure to comply with Section 4(f) of the Department of Transportation Act, 23 U.S.C. § 138(a)(3), because the project failed to include "all possible planning to minimize harm" to historic properties. *Merritt Parkway Conservancy v. Mineta*, 424 F. Supp. 2d 396 (D. Conn. 2006).

We are pleased that a consensus has developed among the consulting parties in support of Alternative 26 as the least harmful alternative, which would minimize harm to the Merritt Parkway and other historic resources. As a result, we share the view that Alternative 21D, by contrast, would *not* comply with the requirements of Section 4(f) to "minimize harm."

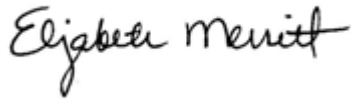
We appreciate the effort made by the state and federal highway agencies to incorporate many of our suggestions and comments into the draft Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act. However, one of our important comments was *not* incorporated -- our request to extend certain privileges to all consulting parties rather than being limited to "concurring" parties. These privileges include the right to participate in the design review process, under Stipulation I.1., and the right to invoke the dispute resolution process, under Stipulation V. This is an issue that the National Trust frequently raises in Section 106 consultations, because we recognize that consulting parties are sometimes reluctant to sign as "concurring" parties, as they don't want to be misperceived as endorsing the underlying project. This is often a concern, for example, raised by Tribes. In this case, however, since the future involvement in design review and dispute resolution is being made contingent on signing the MOA as a concurring party, the National Trust will do so in order to ensure our right to participate.

Like the Merritt Parkway Conservancy and others, the National Trust would not want our concurrence in the MOA to be construed as potential acceptance of Alternative 21D, in the event it were to be selected. However, we are enclosing our official signature as a concurring party in order to protect our right to participate directly in the design review

process and to invoke the dispute resolution provision in the event of an unresolved disagreement.

Thank you again for including the National Trust in the Section 106 review for this Merritt Parkway project.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Merritt". The script is cursive and fluid, with the first name and last name clearly legible.

Elizabeth S. Merritt
Deputy General Counsel

Enclosure: Signed MOA for Route 7/15 Merritt Parkway Interchange Project

cc: David Clarke, Federal Preservation Officer, FHWA
Mandy Ranslow and Jaime Loichinger, ACHP
Jonathan Kinney, State Historic Preservation Officer
Wes Haynes, Merritt Parkway Conservancy
Jane Montanaro, Preservation CT
Todd Bryant, Norwalk Preservation Trust
Peter Viteretto, CT ASLA

Merritt Parkway Conservancy
MOA Signature Cover Letter
April 26, 2023



Merritt Parkway Conservancy PO Box 17072, Stamford, CT 06907 Ph: 203.661.3255
www.merrittparkway.org

April 26, 2023

Mark J. McMillan
Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

Re: 7/15 Interchange MOA

Dear Mark,

The Merritt Parkway Conservancy has actively engaged with all parties within the 7/15 PAC for over a decade in the search for an acceptable interchange plan. After more than 25 rejected concepts, the process produced Alternative 26, to date the one and only park-like concept consistent with the Merritt's historic character, setting and scale.

The Conservancy strongly supports moving forward with Alternative 26. We are optimistic that it offers landscaping opportunities following the principles referenced in the mitigation that will remedy much of the existing scenic harm imposed by Super 7's construction. Along with other measures in the MOA, Alternative 26 provides balanced mitigation for the loss of the Main Avenue bridge. In our view, only the selection of Alternative 26 would satisfy the stringent requirements of Section 4(f) to include all possible planning to minimize harm.

The Conservancy appreciates the effort made by CT DOT and FHWA to incorporate many of our suggestions in the Section 106 MOA. However, inaction on our request to change the provisions in the MOA to extend certain privileges limited to concurring parties to all consulting parties is problematic with the alternative selection process still open. The much larger and longer Alternative 21D is not an acceptable solution. It would further degrade the park-like setting of the interchange. As a concurring party, the Conservancy does not imply any support or endorsement of Alternative 21D, and we will challenge it if selected.

We thus sign as a concurring party under protest at this time to protect our legal rights to be involved in the design review process and to invoke dispute resolution made contingent by that status.

Sincerely,

Wes Haynes
Executive Director

cc Garrett Eucalitto, Commissioner CT DOT
Jonathan Kinney, State Historic Preservation Officer
Elizabeth Merritt, National Trust for Historic Preservation
Jane Montanaro, Preservation CT
Peter Viteretto, CT ASLA
Todd Bryant, Norwalk Preservation Trust

attachment

Preservation Connecticut
MOA Signature Cover Letter
April 23, 2023



24 April 2023

Mark J. McMillan
Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, Connecticut 06131

Dear Mr. McMillan:

Attached please find Preservation Connecticut's signature page as a concurring party to the Memorandum of Agreement for the Merritt Parkway/Route 7 Interchange project.

Preservation Connecticut has followed the development of this project for many years. While we still are not entirely convinced of the need for all the project, we applaud the care with which the Department of Transportation has carried out the planning for this most recent version of the interchange. The MOA addresses most of our concerns related to the redesign of the interchange and it presents a valuable opportunity at last to correct some of the damage done to the parkway's landscape by the original construction of Route 7.

However, we wish to be clear that we are signing this MOA with the understanding that the preferred alternative will most likely be Alternative 26, which we believe is by far the best option for preserving and enhancing the parkway's historic character. In fact, Preservation Connecticut's concurrence is based on the selection of Alternative 26. If any other option is selected, the project will result in a significant adverse effect on the Parkway's integrity and will require a significantly higher level of mitigation.

Preservation Connecticut is proud to play a role in the preservation of the Merritt Parkway, with involvement stretching back to writing the National Register nomination for the parkway, in 1991. We remain committed to continuing to advocate for and assist in the Parkway's preservation.

Very truly yours,

Jane Montanaro
Executive Director

cc:
Jonathan Kinney, State Historic Preservation Officer
Wes Haynes, Merritt Parkway Conservancy
Peter Viteretto, Connecticut ASLA

FHWA invitation to Tribal Nations
to review draft MOA
November 22, 2022

FHWA CT Division: Draft Memorandum of Agreement for SPN 0102-0358 Norwalk - Interchange Improvements at Routes 7 & 15



emilie.holland@dot.gov

Nov 22, 2022, 9:58 AM

To: jquinn@moheganmail.com sbachor@delawaretribe.org mejohnson@mptn-nsn.gov office@nithpo.net klucas@delawarenation-nsn.gov

Cc:

sbachor@delawaretribe.com jbnithpo@gmail.com maxbrowngarcia@yahoo.com tashtesook@aol.com brwnjbb123@aol.com acholewa@moheganmail.com

1 attachment - Expires: 1671771599000

Good morning,

Please find attached a draft Memorandum of Agreement (MOA) for the Route 7/15 Interchange Project in Norwalk. The draft MOA has been prepared with stipulations that were discussed during meeting on September 29, 2022 as well as from comments and suggestions received from the Section 106 consulting parties following that meeting.

You're invited to review this document and provide comments. When reviewing, you'll note that some text is highlighted and has an accompanying footnote. These are portions of the MOA that will be revised or resolved prior to finalizing the document.

Within the next 30 days, please provide the following:

1. Any comments you have regarding the MOA and its mitigation measures
2. Confirmation that you/your organization want to be listed on the MOA as a Concurring Party. If no response or confirmation is received during this review period, or if you respond that you do not wish to be a Concurring Party to the MOA, the signature page will be removed from the document. Notes that opting to not to be a Concurring Party to the MOA will not affect your status as a Section 106 Consulting Party. You will still be kept informed of the project developments and encouraged to continue participating in this process.
3. Confirmation of the name and title of the person to be listed on the Concurring Party signature page. In some cases, the person(s) attending the Section 106 and PAC meetings is not the same person that would ultimately be the representative signing for your organization.

If you have any questions about the MOA document or the Section 106 process, please contact me.


Thank you as always for your time and consideration,

-Emilie

PLEASE NOTE NEW OFFICE ADDRESS

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 450 Main Street - Suite 612, Hartford, CT 06103

File attachment expires: Dec 22, 2022

Name	Size	
 DRAFT-MOA_Route7-15_102-358_2022-10-31.docx	1002.2 KB	43f9af29008baa3697ab9f6d95f11cd4md5

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

SUBMITTED PURSUANT to 36 CFR 800.6(a)

WHEREAS, the Connecticut Department of Transportation (CTDOT), an agency of the State of Connecticut, proposes a series of changes to the intersection of Route 7, Route 15 (the Merritt Parkway), and Main Avenue in Norwalk, Connecticut (the undertaking); and

WHEREAS, the U.S. Department of Transportation, Federal Highway Administration (FHWA) is providing funding for the undertaking, making it subject to the provisions of Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108) and its implementing regulations, 36 C.F.R. Part 800, et. seq.; and

WHEREAS, FHWA in consultation with CTDOT and the Connecticut State Historic Preservation Officer (CTSHPO) has defined the Area of Potential Effect (APE) of the undertaking as shown on the attached map (Attachment A); and

WHEREAS, FHWA has consulted with CTSHPO pursuant to 36 CFR Part 800 and determined that the following National Register of Historic Places (NRHP)-listed or eligible properties are within the undertaking's APE: the Merritt Parkway Historic District, including five of its contributing components (the Perry Avenue Bridge, the Norwalk River Bridge, the Metro-North Bridge, the Main Avenue Bridge, and the West Rocks Road Bridge); the Verneur Pratt Historic District; the Glover Avenue Bridge; and three pre-contact era archaeological sites; and

WHEREAS, FHWA, in consultation with CTSHPO, has determined that the undertaking will have unavoidable adverse effects pursuant to 36 C.F.R. Part 800.5 on the Merritt Parkway Historic District and three of its contributing components (the Norwalk River Bridge, the Metro-North Bridge, and the Main Avenue Bridge), the Glover Avenue Bridge, and **three archaeological sites**¹ collectively, the historic properties); and

WHEREAS, the Merritt Parkway Historic District, including all its contributing components within the project limits, was documented for the Historic American Engineering Record in 1992 (HAER No. CT-63, HAER No. CT-90, HAER No. CT-91, HAER No. CT-92, HAER No. CT-93, and HAER No. CT-94); and

WHEREAS, written and photographic documentation of the Glover Avenue Bridge was prepared to CTSHPO standards and archived in the Connecticut Historic Preservation Collection, University of Connecticut Archives and Special Collections, in 2000; and

WHEREAS, FHWA has consulted with the Delaware Nation, the Delaware Tribe of Indians, the Mashantucket Pequot Tribal Nation, the Mohegan Tribe of Indians in Connecticut, the Narragansett Indian Tribe, and the Stockbridge-Munsee Community Band of Mohican Indians, each of which was represented by their respective Federal Tribal Historic Preservation Office pursuant to the 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act (54 USC 300101 et seq.); and

WHEREAS, the Delaware Nation provided its response on January 20, 2021, the Mashantucket Pequot Tribal Nation provided its response on July 29, 2021; and

WHEREAS, the Advisory Council on Historic Preservation, the Connecticut Chapter of the American Society of Landscape Architects, Merritt Parkway Conservancy, the National Trust for Historic Preservation, the Norwalk Association of Silvermine Homeowners, the Norwalk Historical Commission (City of Norwalk), the Norwalk Historical Society, the Norwalk Land Trust, the Norwalk Preservation Trust, Preservation Connecticut, and the Silvermine Community Association have participated in the consultation process pursuant to 36 C.F.R. Part 800 and have been invited to concur in this Memorandum of Agreement (MOA); and

WHEREAS, the Merritt Parkway Conservancy, the Norwalk Association of Silvermine Homeowners, the City of Norwalk, and the Silvermine Community Association participated with CTDOT in the formulation of design guidelines for the project, itemized in “Merritt Parkway Landscape Assessment Guidelines” (March 2020); and

¹ Impacts to archaeological sites occur under Alternative 26. This clause will be deleted if Alternative 21D is selected as the preferred alternative under the EA/EIE analysis.

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FHWA has notified the Advisory Council on Historic Preservation (the Council) of its adverse effect determinations with specified documentation, and in a letter dated October 1, 2021, has invited the Council to participate in consultations regarding the resolution of those adverse effects; and

WHEREAS, in a letter dated [Date], the Council has notified FHWA of its intention to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

NOW, THEREFORE, FHWA, CTDOT, and CTSHPO agree that the undertaking shall be implemented with the following stipulations to ensure that effects to the historic properties are taken into account:

[Remainder of page left intentionally blank]

I. STIPULATIONS

FWHA will ensure that the following measures are carried out within ten (10) years of the date on which this MOA is executed unless the deadline is extended in accordance with Section VI of this MOA.

1. In preparing the final design, CTDOT shall, as far as possible, follow the guidelines in “Merritt Parkway Landscape Assessment Guidelines” (March 2020). CTDOT shall submit the final design to CTSHPO and FHWA for review and shall revise the design accordingly.
2. CTDOT shall design the replacement for the Main Avenue Bridge so as to complement the established aesthetic of the Merritt Parkway Historic District. CTDOT shall submit the design for the replacement bridge to CTSHPO and FHWA for review and shall revise the design accordingly.
3. Prior to construction-related activities, CTDOT shall prepare supplementary written and photographic documentation of the Glover Avenue Bridge according to CTSHPO or Historic American Engineering Record (HAER) standards.² CTDOT shall submit a draft of the supplementary documentation to CTSHPO and FHWA for review and shall revise the documentation accordingly.
4. CTDOT shall incorporate the existing stone tablet in the design of the Glover Avenue Bridge replacement, identifying it as the dedicatory plaque of the previous 1912 bridge on the site.
5. Prior to construction-related activities, CTDOT shall, in consultation with the CTSHPO, develop and professionally implement an archaeological data recovery program with regard to the impacted archaeological sites. All data recovery investigations shall be consistent with the CTSHPO’s *Environmental Review Primer for Connecticut’s Archaeological Resources* and the United States Secretary of the Interior’s *Standards and Guidelines for Archeology and Historic Preservation*. CTDOT will provide CTSHPO with two (2) bound copies of the final data recovery report.³
6. Upon completion of the data analysis, CTDOT shall ensure all field notes, photographs, artifacts, flotation samples and other pertinent data are professionally deposited with the Office of the State Archaeologist at the University of Connecticut (Storrs) for permanent curation and public accessibility.

² Note: level of documentation (CTSHPO standard or HAER) will be confirmed prior to finalizing this MOA.

³ Stipulations #5 and #6 applicable only if Alternative 26 is identified as the preferred alternative under the NEPA/CEPA analysis.

II. DURATION OF THIS MOA

This MOA will expire if its terms are not carried out within ten (10) years from the date of its execution. Prior to such time, the signatories may consult to reconsider the terms of the MOA and amend it in accordance with Section VI.

III. UNANTICIPATED DISCOVERIES AND EFFECTS

- A. In the event that an historic property is discovered or unanticipated effects on identified archaeological properties occurs, CTDOT shall notify the FHWA and CTSHPO and refrain from further project activities in the immediate vicinity of that may reasonably be assumed to affect the historic property. CTDOT shall to the extent possible, protect the historic property *in situ* to allow for consultation with FHWA, CTSHPO, and the Tribes. No artifacts shall be removed from the site unless approved by all parties.
- B. In consultation with FHWA, CTSHPO, and the Tribes, CTDOT shall develop a suitable course of action to address the discovery.
- C. In the event that an acceptable resolution cannot be achieved, FHWA will follow the dispute resolution process set forth in Section V.

IV. REPORTING FULFILLMENT OF STIPULATIONS

CTDOT shall provide notification to all signatories and concurring parties to this MOA, via email or letter, when all stipulations of this MOA have been fully satisfied.

Each year following the execution of this MOA until it expires or is terminated, CTDOT shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FHWA and CTDOT's efforts to carry out the terms of this MOA.

V. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

1. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the Council. The Council shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching its final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the Council, signatories, and concurring parties, and shall provide them with a copy of its written response. FHWA will then proceed according to its final decision.

2. If the Council does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and shall provide them and the Council with a copy of such written response.

VI. AMENDMENTS

If any signatory to this MOA believes that this MOA should be amended, that signatory may propose amendments to the other signatories, whereupon all signatories shall consult to consider the amendments pursuant to 36 CFR 800.6(c)(7) and 800.6(c)(8).

VII. TERMINATION

If the FHWA determines that it cannot implement the terms of this MOA, or if the CTSHPO determines that this MOA is not being properly implemented, either of these signatories may propose that the MOA be terminated. The signatory proposing termination shall notify the other signatories and concurring parties to this MOA, explaining the reasons for termination and affording these other parties at least thirty (30) days' notice to consult and seek alternatives to termination. At that time, the parties shall consult.

- a. Should such consultation fail, either FHWA or the CTSHPO may terminate this MOA by so notifying the other parties.
- b. In the event of termination, FHWA shall either consult in accordance with 36 CFR 800.6 to develop and execute a new MOA or request the Council to comment pursuant to 36 CFR 800.7.

VIII. COUNTERPARTS

This MOA may be signed in counterpart copies, all of which, taken together, shall constitute but one and the same document.

EXECUTION OF THIS MOA

Execution of this MOA by FHWA, CTDOT, and CTSHPO and implementation of its terms are evidence that

- a. FHWA has afforded the Council an opportunity to comment on the proposed undertaking and its effects on the historic properties;
- b. FHWA has afforded CTSHPO an opportunity to comment on the proposed undertaking and its effects on the historic properties;
- c. FHWA has taken into account the effects of the undertaking on the historic properties

SIGNATURES FOLLOW ON SEPARATE PAGES

Signatories

- ☐ ACHP
- ☐ FHWA
- ☐ CTSHPO
- ☐ CTDOT

Concurring Parties

Note: Below is the complete list of §106 Consulting Parties. Representatives from each of these parties will need to confirm whether they wish to be Concurring Parties to this MOA.

Any party that opts not to be a Concurring Party to this MOA, will remain a Section 106 Consulting Party. They will continue to be informed of developments in this project and are encouraged to continue participating.

- ☐ ACHP
- ☐ City of Norwalk
- ☐ Connecticut Chapter of the American Society of Landscape Architects
- ☐ Delaware Nation
- ☐ Delaware Tribe of Indians
- ☐ Mashantucket Pequot Tribal Nation
- ☐ Merritt Parkway Conservancy
- ☐ The Mohegan Tribe
- ☐ Narragansett Indian Tribe
- ☐ National Trust for Historic Preservation
- ☐ Norwalk Association of Silvermine Homeowners (NASH)
- ☐ Norwalk Historical Commission
- ☐ Norwalk Historical Society
- ☐ Norwalk Land Trust
- ☐ Norwalk Preservation Trust
- ☐ Norwalk River Watershed Association
- ☐ Preservation Connecticut
- ☐ Sierra Club, CT
- ☐ Silvermine Community Association

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT

FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Advisory Council on Historic Preservation

By: Reid Nelson, Executive Director

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Federal Highway Administration

By: _____
Amy Jackson-Grove, Division Administrator

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Connecticut State Historic Preservation Officer

By:

Jonathan Kinney
Connecticut State Historic Preservation Officer

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT

FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Connecticut Department of Transportation

By: _____
Kimberly Lesay
Bureau Chief, Bureau of Policy and Planning

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

City of Norwalk

By:

Steve Kleppin,
Planning and Zoning Director

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Connecticut Chapter of the American Society of Landscape Architects

By:

Peter Viteretto, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Delaware Nation

By:

Katelyn Lucas, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Delaware Tribe of Indians

By:

Susan Bachor
Historic Preservation Representative

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Mashantucket Pequot Tribal Nation

By: _____

Michael Kicking Bear Johnson, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Merritt Parkway Conservancy

By:

Wes Haynes, Executive Director

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

The Mohegan Tribe

By: _____

James Quinn,
Tribal Historic Preservation Officer

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Narragansett Indian Tribe

By:

Max Brown Garcia, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

National Trust for Historic Preservation

By: _____

Elizabeth S. Merritt
Deputy General Counsel

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Association of Silvermine Homeowners

By:

Allan Kibbe, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Historical Commission, City of Norwalk

By:

Dana Laird, Chair

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Historical Society

By:

Jo-Anne Schultz, President

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Land Trust

By:

Peter Malkin, Chair

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Preservation Trust

By:

Tod Bryant, President

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk River Watershed Association

By:

Peter Fabroni, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Preservation Connecticut

By: _____ Date: _____
Jane Montanaro, Executive Director

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Sierra Club, Connecticut

By:

John D. Calandrelli, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT

FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Silvermine Community Association

By:

Yvonne Brown, Co-President

Date: _____

By:

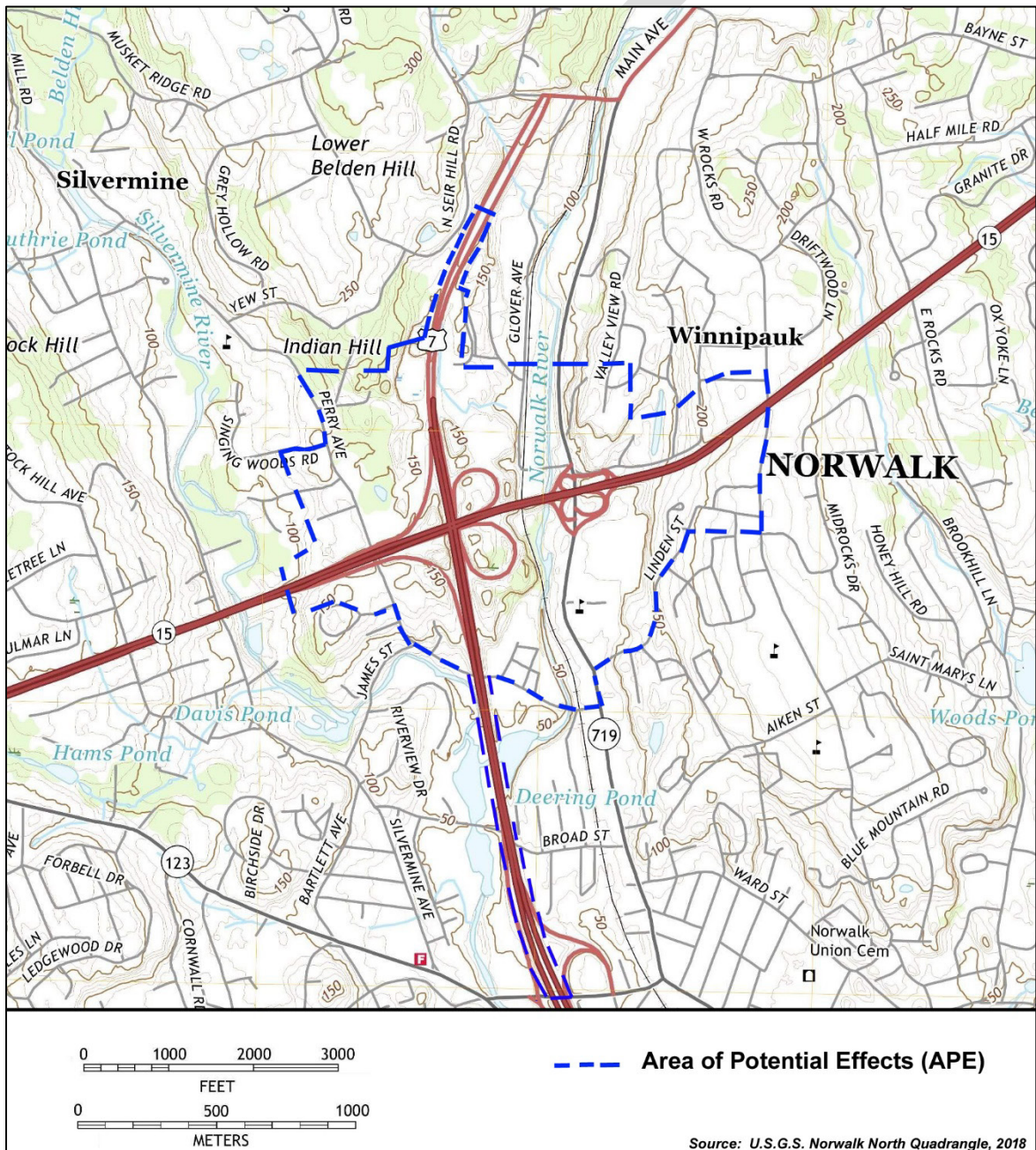
Tom Fisher, Co-President

Date: _____

**MEMORANDUM OF AGREEMENT
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 102-358**

ATTACHMENT A:

Area of Potential Effect (APE) Map



CTDOT invitation to Consulting Parties
to review draft MOA
November 8, 2022

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, November 08, 2022 10:35 AM
To: Mandy Ranslow <mranslow@achp.gov>; Elizabeth Merritt <emerritt@savingplaces.org>; sworden@savingplaces.org; Kleppin, Steven <skleppin@norwalkct.org>; Wes Haynes <wes@merrittparkway.org>; jmontanaro@preservationct.org; Christopher Wigren <cwigren@preservationct.org>; info@norwalklandtrust.org; 'director@norwalkhistoricalsociety.org' <director@norwalkhistoricalsociety.org>; 'tbryant23 [REDACTED]' <tbryant23 [REDACTED]>; llevey.architect [REDACTED]; David Westmoreland <>; 'Viteretto, Peter (ASLA)' <viteretto@heritagelandscapes.cc>; Alan Kibbe <akibbe [REDACTED]>; heatherdunn [REDACTED]; connecticut.chapter@sierraclub.org; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Labadia, Catherine <catherine.labadia@ct.gov>
Cc: Burnham, Kevin J. <Kevin.Burnham@ct.gov>; Macrohon, Krishalyn D. <Krishalyn.Macrohon@ct.gov>; Patel, Niles M. (DOT) <Niles.Patel@ct.gov>; Carifa, Kevin F <kevin.carifa@ct.gov>; Murphy, Lynn D. <lynn.murphy@ct.gov>; Eberle, John <John.Eberle@stantec.com>; Wagner, Barbara <barbara.wagner@stantec.com>; Mojica, Christopher <Christopher.Mojica@stantec.com>; Holland, Emilie (FHWA) <emilie.holland@dot.gov>; Salmoiraghi, Kurt (FHWA) <kurt.salmoiraghi@dot.gov>
Subject: FOR REVIEW: DRAFT Memorandum of Agreement for Route 7/15 Interchange Project, Norwalk

Good morning,

Please find attached a draft Memorandum of Agreement (MOA) for the Route 7/15 Interchange Project in Norwalk. The draft MOA has been prepared with stipulations that were discussed during meeting on September 29, 2022 as well as from comments and suggestions received from the Section 106 consulting parties following that meeting.

You're invited to review this document and provide comments. When reviewing, you'll note that some text is highlighted and has an accompanying footnote. These are portions of the MOA that will be revised or resolved prior to finalizing the document.

Within the next 30 days (by **Friday, December 9, 2022**), please provide the following:

1. Any comments you have regarding the MOA and its mitigation measures
2. Confirmation that you/your organization want to be listed on the MOA as a Concurring Party.
If no response or confirmation is received during this review period, or if you respond that you

do not wish to be a Concurring Party to the MOA, the signature page will be removed from the document. Notes that opting to not to be a Concurring Party to the MOA will not affect your status as a Section 106 Consulting Party. You will still be kept informed of the project developments and encouraged to continue participating in this process.

3. Confirmation of the name and title of the person to be listed on the Concurring Party signature page. In some cases, the person(s) attending the Section 106 and PAC meetings is not the same person that would ultimately be the representative signing for your organization.

If you have any questions about the MOA document or the Section 106 process, please contact me.

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

☎ (860) 594-2135

☎ (860) 594-3028 - Fax

✉ mark.mcmillan@ct.gov

Caution: This email originated from outside of Stantec. Please take extra precaution.

Attention: Ce courriel provient de l'extérieur de Stantec. Veuillez prendre des précautions supplémentaires.

Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

SUBMITTED PURSUANT to 36 CFR 800.6(a)

WHEREAS, the Connecticut Department of Transportation (CTDOT), an agency of the State of Connecticut, proposes a series of changes to the intersection of Route 7, Route 15 (the Merritt Parkway), and Main Avenue in Norwalk, Connecticut (the undertaking); and

WHEREAS, the U.S. Department of Transportation, Federal Highway Administration (FHWA) is providing funding for the undertaking, making it subject to the provisions of Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108) and its implementing regulations, 36 C.F.R. Part 800, et. seq.; and

WHEREAS, FHWA in consultation with CTDOT and the Connecticut State Historic Preservation Officer (CTSHPO) has defined the Area of Potential Effect (APE) of the undertaking as shown on the attached map (Attachment A); and

WHEREAS, FHWA has consulted with CTSHPO pursuant to 36 CFR Part 800 and determined that the following National Register of Historic Places (NRHP)-listed or eligible properties are within the undertaking's APE: the Merritt Parkway Historic District, including five of its contributing components (the Perry Avenue Bridge, the Norwalk River Bridge, the Metro-North Bridge, the Main Avenue Bridge, and the West Rocks Road Bridge); the Verneur Pratt Historic District; the Glover Avenue Bridge; and three pre-contact era archaeological sites; and

WHEREAS, FHWA, in consultation with CTSHPO, has determined that the undertaking will have unavoidable adverse effects pursuant to 36 C.F.R. Part 800.5 on the Merritt Parkway Historic District and three of its contributing components (the Norwalk River Bridge, the Metro-North Bridge, and the Main Avenue Bridge), the Glover Avenue Bridge, and **three archaeological sites**¹ collectively, the historic properties); and

WHEREAS, the Merritt Parkway Historic District, including all its contributing components within the project limits, was documented for the Historic American Engineering Record in 1992 (HAER No. CT-63, HAER No. CT-90, HAER No. CT-91, HAER No. CT-92, HAER No. CT-93, and HAER No. CT-94); and

WHEREAS, written and photographic documentation of the Glover Avenue Bridge was prepared to CTSHPO standards and archived in the Connecticut Historic Preservation Collection, University of Connecticut Archives and Special Collections, in 2000; and

WHEREAS, FHWA has consulted with the Delaware Nation, the Delaware Tribe of Indians, the Mashantucket Pequot Tribal Nation, the Mohegan Tribe of Indians in Connecticut, the Narragansett Indian Tribe, and the Stockbridge-Munsee Community Band of Mohican Indians, each of which was represented by their respective Federal Tribal Historic Preservation Office pursuant to the 36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act (54 USC 300101 et seq.); and

WHEREAS, the Delaware Nation provided its response on January 20, 2021, the Mashantucket Pequot Tribal Nation provided its response on July 29, 2021; and

WHEREAS, the Advisory Council on Historic Preservation, the Connecticut Chapter of the American Society of Landscape Architects, Merritt Parkway Conservancy, the National Trust for Historic Preservation, the Norwalk Association of Silvermine Homeowners, the Norwalk Historical Commission (City of Norwalk), the Norwalk Historical Society, the Norwalk Land Trust, the Norwalk Preservation Trust, Preservation Connecticut, and the Silvermine Community Association have participated in the consultation process pursuant to 36 C.F.R. Part 800 and have been invited to concur in this Memorandum of Agreement (MOA); and

WHEREAS, the Merritt Parkway Conservancy, the Norwalk Association of Silvermine Homeowners, the City of Norwalk, and the Silvermine Community Association participated with CTDOT in the formulation of design guidelines for the project, itemized in “Merritt Parkway Landscape Assessment Guidelines” (March 2020); and

¹ Impacts to archaeological sites occur under Alternative 26. This clause will be deleted if Alternative 21D is selected as the preferred alternative under the EA/EIE analysis.

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FHWA has notified the Advisory Council on Historic Preservation (the Council) of its adverse effect determinations with specified documentation, and in a letter dated October 1, 2021, has invited the Council to participate in consultations regarding the resolution of those adverse effects; and

WHEREAS, in a letter dated [Date], the Council has notified FHWA of its intention to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

NOW, THEREFORE, FHWA, CTDOT, and CTSHPO agree that the undertaking shall be implemented with the following stipulations to ensure that effects to the historic properties are taken into account:

[Remainder of page left intentionally blank]

I. STIPULATIONS

FWHA will ensure that the following measures are carried out within ten (10) years of the date on which this MOA is executed unless the deadline is extended in accordance with Section VI of this MOA.

1. In preparing the final design, CTDOT shall, as far as possible, follow the guidelines in “Merritt Parkway Landscape Assessment Guidelines” (March 2020). CTDOT shall submit the final design to CTSHPO and FHWA for review and shall revise the design accordingly.
2. CTDOT shall design the replacement for the Main Avenue Bridge so as to complement the established aesthetic of the Merritt Parkway Historic District. CTDOT shall submit the design for the replacement bridge to CTSHPO and FHWA for review and shall revise the design accordingly.
3. Prior to construction-related activities, CTDOT shall prepare supplementary written and photographic documentation of the Glover Avenue Bridge according to CTSHPO or Historic American Engineering Record (HAER) standards.² CTDOT shall submit a draft of the supplementary documentation to CTSHPO and FHWA for review and shall revise the documentation accordingly.
4. CTDOT shall incorporate the existing stone tablet in the design of the Glover Avenue Bridge replacement, identifying it as the dedicatory plaque of the previous 1912 bridge on the site.
5. Prior to construction-related activities, CTDOT shall, in consultation with the CTSHPO, develop and professionally implement an archaeological data recovery program with regard to the impacted archaeological sites. All data recovery investigations shall be consistent with the CTSHPO’s *Environmental Review Primer for Connecticut’s Archaeological Resources* and the United States Secretary of the Interior’s *Standards and Guidelines for Archeology and Historic Preservation*. CTDOT will provide CTSHPO with two (2) bound copies of the final data recovery report.³
6. Upon completion of the data analysis, CTDOT shall ensure all field notes, photographs, artifacts, flotation samples and other pertinent data are professionally deposited with the Office of the State Archaeologist at the University of Connecticut (Storrs) for permanent curation and public accessibility.

² Note: level of documentation (CTSHPO standard or HAER) will be confirmed prior to finalizing this MOA.

³ Stipulations #5 and #6 applicable only if Alternative 26 is identified as the preferred alternative under the NEPA/CEPA analysis.

II. DURATION OF THIS MOA

This MOA will expire if its terms are not carried out within ten (10) years from the date of its execution. Prior to such time, the signatories may consult to reconsider the terms of the MOA and amend it in accordance with Section VI.

III. UNANTICIPATED DISCOVERIES AND EFFECTS

- A. In the event that an historic property is discovered or unanticipated effects on identified archaeological properties occurs, CTDOT shall notify the FHWA and CTSHPO and refrain from further project activities in the immediate vicinity of that may reasonably be assumed to affect the historic property. CTDOT shall to the extent possible, protect the historic property *in situ* to allow for consultation with FHWA, CTSHPO, and the Tribes. No artifacts shall be removed from the site unless approved by all parties.
- B. In consultation with FHWA, CTSHPO, and the Tribes, CTDOT shall develop a suitable course of action to address the discovery.
- C. In the event that an acceptable resolution cannot be achieved, FHWA will follow the dispute resolution process set forth in Section V.

IV. REPORTING FULFILLMENT OF STIPULATIONS

CTDOT shall provide notification to all signatories and concurring parties to this MOA, via email or letter, when all stipulations of this MOA have been fully satisfied.

Each year following the execution of this MOA until it expires or is terminated, CTDOT shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FHWA and CTDOT's efforts to carry out the terms of this MOA.

V. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

1. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the Council. The Council shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching its final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the Council, signatories, and concurring parties, and shall provide them with a copy of its written response. FHWA will then proceed according to its final decision.

2. If the Council does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and shall provide them and the Council with a copy of such written response.

VI. AMENDMENTS

If any signatory to this MOA believes that this MOA should be amended, that signatory may propose amendments to the other signatories, whereupon all signatories shall consult to consider the amendments pursuant to 36 CFR 800.6(c)(7) and 800.6(c)(8).

VII. TERMINATION

If the FHWA determines that it cannot implement the terms of this MOA, or if the CTSHPO determines that this MOA is not being properly implemented, either of these signatories may propose that the MOA be terminated. The signatory proposing termination shall notify the other signatories and concurring parties to this MOA, explaining the reasons for termination and affording these other parties at least thirty (30) days' notice to consult and seek alternatives to termination. At that time, the parties shall consult.

- a. Should such consultation fail, either FHWA or the CTSHPO may terminate this MOA by so notifying the other parties.
- b. In the event of termination, FHWA shall either consult in accordance with 36 CFR 800.6 to develop and execute a new MOA or request the Council to comment pursuant to 36 CFR 800.7.

VIII. COUNTERPARTS

This MOA may be signed in counterpart copies, all of which, taken together, shall constitute but one and the same document.

EXECUTION OF THIS MOA

Execution of this MOA by FHWA, CTDOT, and CTSHPO and implementation of its terms are evidence that

- a. FHWA has afforded the Council an opportunity to comment on the proposed undertaking and its effects on the historic properties;
- b. FHWA has afforded CTSHPO an opportunity to comment on the proposed undertaking and its effects on the historic properties;
- c. FHWA has taken into account the effects of the undertaking on the historic properties

SIGNATURES FOLLOW ON SEPARATE PAGES

Signatories

- ☐ ACHP
- ☐ FHWA
- ☐ CTSHPO
- ☐ CTDOT

Concurring Parties

Note: Below is the complete list of §106 Consulting Parties. Representatives from each of these parties will need to confirm whether they wish to be Concurring Parties to this MOA.

Any party that opts not to be a Concurring Party to this MOA, will remain a Section 106 Consulting Party. They will continue to be informed of developments in this project and are encouraged to continue participating.

- ☐ ACHP
- ☐ City of Norwalk
- ☐ Connecticut Chapter of the American Society of Landscape Architects
- ☐ Delaware Nation
- ☐ Delaware Tribe of Indians
- ☐ Mashantucket Pequot Tribal Nation
- ☐ Merritt Parkway Conservancy
- ☐ The Mohegan Tribe
- ☐ Narragansett Indian Tribe
- ☐ National Trust for Historic Preservation
- ☐ Norwalk Association of Silvermine Homeowners (NASH)
- ☐ Norwalk Historical Commission
- ☐ Norwalk Historical Society
- ☐ Norwalk Land Trust
- ☐ Norwalk Preservation Trust
- ☐ Norwalk River Watershed Association
- ☐ Preservation Connecticut
- ☐ Sierra Club, CT
- ☐ Silvermine Community Association

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT

FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Advisory Council on Historic Preservation

By: _____

Reid Nelson, Executive Director

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Federal Highway Administration

By: _____
Amy Jackson-Grove, Division Administrator

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Connecticut State Historic Preservation Officer

By:

Jonathan Kinney
Connecticut State Historic Preservation Officer

Date: _____

SIGNATORY PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT

FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Connecticut Department of Transportation

By: _____
Kimberly Lesay
Bureau Chief, Bureau of Policy and Planning

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

City of Norwalk

By:

Steve Kleppin,
Planning and Zoning Director

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Connecticut Chapter of the American Society of Landscape Architects

By:

Peter Viteretto, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Delaware Nation

By:

Katelyn Lucas, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Delaware Tribe of Indians

By:

Susan Bachor
Historic Preservation Representative

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Mashantucket Pequot Tribal Nation

By: _____

Michael Kicking Bear Johnson, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Merritt Parkway Conservancy

By:

Wes Haynes, Executive Director

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

The Mohegan Tribe

By: _____

James Quinn,
Tribal Historic Preservation Officer

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Narragansett Indian Tribe

By:

Max Brown Garcia, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

National Trust for Historic Preservation

By: _____

Elizabeth S. Merritt
Deputy General Counsel

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Association of Silvermine Homeowners

By:

Allan Kibbe, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Historical Commission, City of Norwalk

By: _____

Dana Laird, Chair

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Historical Society

By:

Jo-Anne Schultz, President

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Land Trust

By:

Peter Malkin, Chair

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk Preservation Trust

By:

Tod Bryant, President

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Norwalk River Watershed Association

By:

Peter Fabroni, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Preservation Connecticut

By: _____ Date: _____
Jane Montanaro, Executive Director

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Sierra Club, Connecticut

By:

John D. Calandrelli, Title

Date: _____

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
AND
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT**

**FEDERAL AID PROJECT 0015(133)
STATE PROJECT 102-358**

Concurring Party

Silvermine Community Association

By: _____

Yvonne Brown, Co-President

Date: _____

By: _____

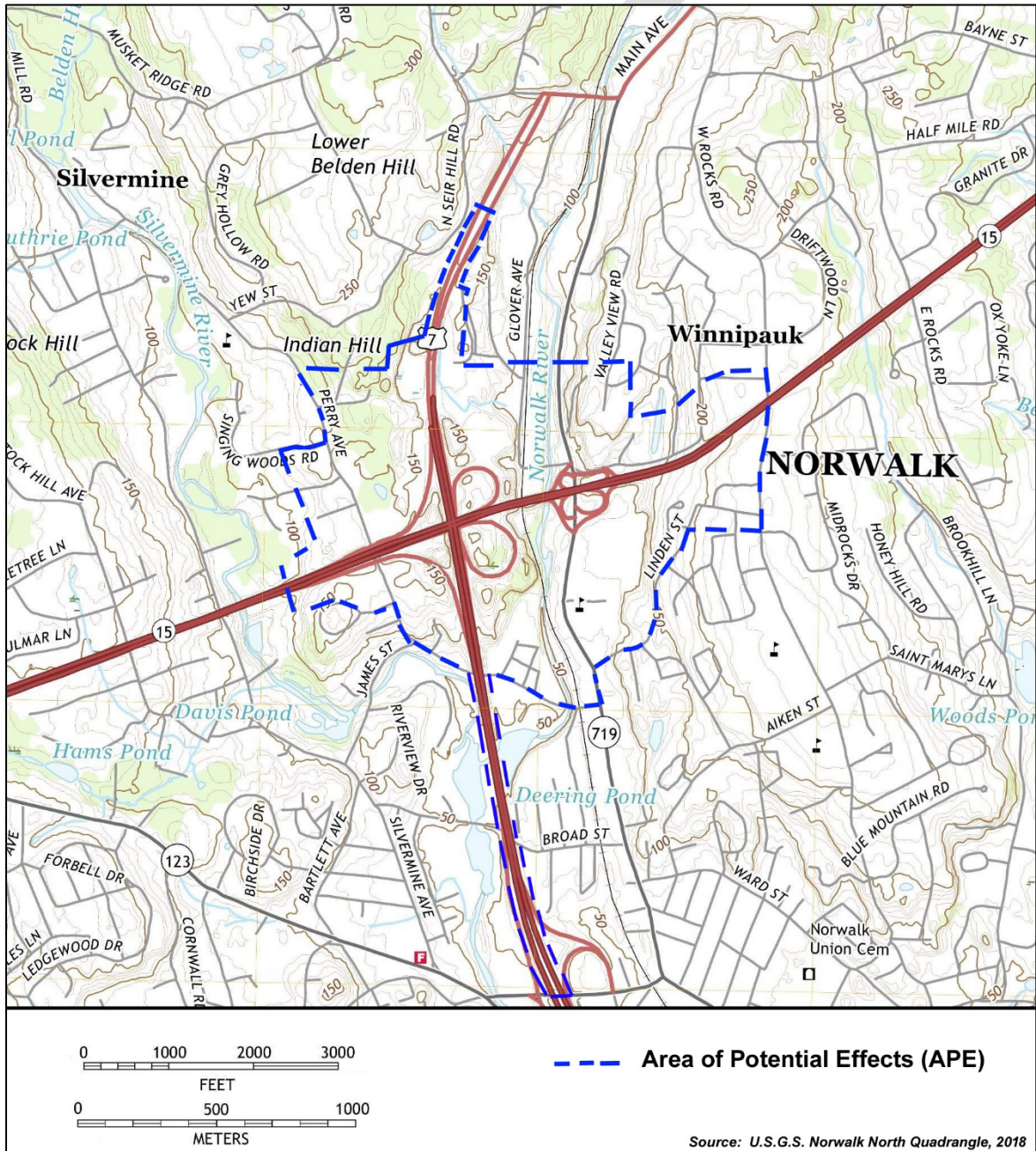
Tom Fisher, Co-President

Date: _____

**MEMORANDUM OF AGREEMENT
REGARDING THE
ROUTE 7/ROUTE 15 (MERRITT PARKWAY) INTERCHANGE PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 102-358**

ATTACHMENT A:

Area of Potential Effect (APE) Map



Mashantucket Pequot Tribal Nation/FHWA
correspondence regarding Section 106
Mitigation Meeting of 9/29/2022
October 5-7, 2022 emails
October 27, 2022 letter

From: [Holland, Emilie \(FHWA\)](#)
To: [Johnson, Michael E](#)
Subject: RE: FHWA CT - State Project No. 0102-0358 Norwalk - Improvements to the Route 7 & 15 (Merritt Parkway) Interchange - Section 106 mitigation Information (MPTN)
Date: Friday, October 7, 2022 7:04:00 AM

Hello Michael,

Thanks for your response. Within the Section 106 process, consulting party status entitles the participant to share their views, receive and review pertinent information, offer ideas, and consider possible solutions together with FHWA and other consulting parties. For FHWA Federal Aid projects, FHWA is always required to invite Federally recognized Tribes with an interest in the project area to consult. Concurring parties have participated in the consultation to resolve adverse effects and are invited by the signatories (FHWA, DOT, ACHP, SHPO) to concur with its outcome.

In addition to the resources on the Advisory Council on Historic Preservation's (ACHP) website, FHWA has a [Section 106 Tutorial](#) available, which provides an overview of the consultation process, including roles and responsibilities, as it relates to highway transportation projects. Signatory roles for MOA's are discussed in the section on Resolving Adverse Effects.

I will review your comments and provide additional response.

Kind regards,

-Emilie

PLEASE NOTE NEW OFFICE ADDRESS

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 450 Main Street - Suite 612, Hartford, CT 06103

From: Johnson, Michael E <MEJohnson@mptn-nsn.gov>
Sent: Thursday, October 6, 2022 4:48 PM
To: Holland, Emilie (FHWA) <emilie.holland@dot.gov>
Subject: RE: FHWA CT - State Project No. 0102-0358 Norwalk - Improvements to the Route 7 & 15 (Merritt Parkway) Interchange - Section 106 mitigation Information (MPTN)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Emilie,

Would you be so kind as to remind me as to the difference between a consulting party vs a concurring party relevant to the MOA?

Please let my following comments serve as feedback under tribal consultation with respect to the route 7/15 meridian parkway project.

if I remember correctly from the presentation, alternative 21 D was (initially) chosen quite a number of years ago, (I believe ten?) and that alternative will not have any effect on the two eligible NRHP archaeological sites.

I also appreciated Mark respecting the confidentiality regarding the posed questions pertaining to artifacts recovered. However, in the spirit of confidentiality, I would have also preferred that archaeological site numbers not be shown at all. It is just one additional level of protection for sites.

I also hope to be speaking with AHS in the near future to learn more.

Given that two of these sites are clearly eligible for listing with the NRHP, and seemingly indigenous in nature, the position of our office remains that they are to be protected. Therefore, from my perspective, if sites 103-57, 58, 60, 61, and 62 will not be affected by Alternative 21 D and this alternative will achieve the goals of improving connections, safety and traffic flow for Route(s) 7 & 15 of the Merritt Parkway, it seems to me this should be the chosen alternative.

In terms of one of the goals stated as that of additional safety, is there data from local or state law enforcement on accidents attributed to the current configuration? (i.e. no build option)

Finally, you also mentioned that FHWA is interested in hearing our thoughts regarding mitigation. Should we infer that a decision has now been made to choose alternative 26? (impact to archaeological sites) It would seem premature to ask for mitigation ideas unless alternative 21 D has not been selected, or is no longer being considered.

If I am correct, and alt 26 was chosen, our office would appreciate a written explanation from FHWA as to why it was necessary to specifically affect indigenous based archaeological sites for this roadway modification.

Thank You!

Michael

From: Holland, Emilie (FHWA) [<mailto:emilie.holland@dot.gov>]

Sent: Wednesday, October 05, 2022 4:37 PM

To: Johnson, Michael E <MEJohnson@mptn-nsn.gov>

Subject: FHWA CT - State Project No. 0102-0358 Norwalk - Improvements to the Route 7 & 15

(Merritt Parkway) Interchange - Section 106 mitigation Information (MPTN)

[This email originated **outside of your network**. Do not click any links or open any attachments unless you trust the sender and know the content is safe.]

Hello Michael,

Thank you for attending the Section 106 Consulting Parties meeting last week for the Route 7 & 15 Interchange project, in Norwalk. Please see the email below with additional information on participating in the development of the Memorandum of Agreement to resolve Adverse Effects. CTDOT is the project sponsor, and they are managing the communication among the consulting parties for this project.

FHWA is interested in hearing your ideas for mitigation. If you have suggestions, in addition to the potential stipulations listed below, please let me know by **Friday, October 14, 2022**. Suggestions received will be utilized in developing a Draft MOA for consideration. Also, if your Office or Tribal Leadership would like to be added as a concurring party to the MOA, let me know.

As discussed in the meeting, the opportunity to participate in the Section 106 process is on-going. This will not be the last or only chance to provide input. If you opt to not be a concurring party to the MOA at this time, you are encouraged to participate in the ongoing consultations regarding this project and its potential impacts to historic properties. Please let me know if you would like this email address to be added to CTDOT's Consulting Parties email distribution list for this project.

Thank you again for your time and participation,

-Emilie

PLEASE NOTE NEW OFFICE ADDRESS

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 450 Main Street - Suite 612, Hartford, CT 06103

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Wednesday, October 5, 2022 10:42 AM
To: Mandy Ranslow <mranslow@achp.gov>; Elizabeth Merritt <emerritt@savingplaces.org>; sworden@savingplaces.org; Kleppin, Steven <skleppin@norwalkct.org>; Wes Haynes <wes@merrittparkway.org>; jmontanaro@preservationct.org; Christopher Wigren <cwigren@preservationct.org>; info@norwalklandtrust.org; 'director@norwalkhistoricalsociety.org' <director@norwalkhistoricalsociety.org>; 'tbryant23 [REDACTED]' <[tbryant23 \[REDACTED\]](mailto:tbryant23 [REDACTED])>; [llevy.architect \[REDACTED\]](mailto:llevy.architect [REDACTED]); David Westmoreland [REDACTED]; 'Viteretto, Peter (ASLA)' <viteretto@heritagelandscapes.cc>; Alan Kibbe <[akibbe \[REDACTED\]](mailto:akibbe [REDACTED])>; [heatherdunn \[REDACTED\]](mailto:heatherdunn [REDACTED]) connecticut.chapter@sierraclub.org; Kinney, Jonathan

<Jonathan.Kinney@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>

Cc: Burnham, Kevin J. <Kevin.Burnham@ct.gov>; Macrohon, Krishalyn D.

<Krishalyn.Macrohon@ct.gov>; Patel, Niles M. (DOT) <Niles.M.Patel@ct.gov>; Carifa, Kevin F

<Kevin.Carifa@ct.gov>; Murphy, Lynn D. <Lynn.Murphy@ct.gov>; Eberle, John

<John.Eberle@stantec.com>; Wagner, Barbara <barbara.wagner@stantec.com>; Mojica,

Christopher <Christopher.Mojica@stantec.com>; Holland, Emilie (FHWA) <emilie.holland@dot.gov>;

Salmoiraghi, Kurt (FHWA) <kurt.salmoiraghi@dot.gov>

Subject: Route 7/15 Interchange project - Section 106 mitigation

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Thank you for attending the Section 106 mitigation meeting for the Route 7 & 15 Interchange project last week. Over the next two weeks, CTDOT will be preparing a draft memorandum of agreement (MOA) that will be shared with you for review and comment. Some of the potential mitigation measures discussed at the meeting and under consideration include:

- Documenting historic properties that will be impacted to State or Historic American Engineering Record (HAER) standards
- Designing the preferred build alternative to follow [Merritt Parkway Landscape Assessment Guidelines](#) as much as possible
- Designing replacement bridges (Main Street twin bridges #00530A and #00530B) to complement the aesthetic of the Merritt Parkway
- Retaining the inscribed stone plaque on the Glover Avenue Bridge for incorporation in replacement bridge
- Developing an Archaeological Treatment Plan to mitigate impacts to archaeological sites, should Alternative 26 be identified as the preferred build alternative.

If you have other suggestions for mitigation, please let me know by **Friday, October 14, 2022** so that they can be added for consideration in the MOA. Also, if you or your organization would like to be added as a concurring party to the MOA, let me know.

As discussed in the meeting, the opportunity to participation in the Section 106 process is on-going.

This will not be the last or only chance to provide input. If you opt to not be a concurring party to the MOA, you can and are encouraged to still participate in the ongoing consultations regarding this project and its potential impacts to historic properties.


Thank you,

Mark

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

 (860) 594-2135

 (860) 594-3028 - Fax

 mark.mcmillan@ct.gov



U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

October 27, 2022

450 Main Street
Suite 612
Hartford, CT 06103
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HEO-CT

Mr. Michael Kickingbear Johnson, Acting THPO
Mashantucket Pequot Tribal Nation
Tribal Historic Preservation Office
550 Trolley Line Blvd., P.O.
Box 3202, Mashantucket, CT 06338-3202

RE: Routes 7/15 Interchange Improvements
Norwalk, Fairfield County, Connecticut
CTDOT State Project Number: 0102-0358
Federal Aid Project Number: 0015(133)
ACHP Project Number: 014039

Dear Mr. Johnson,

Thank you for your comments sent on October 6, 2022, regarding the potential impacts to archaeological sites from the proposed improvements to Route 7 and 15 (Merritt Parkway) Interchange. This response supplements my initial response on October 7, 2022. I understand your comments to relate to the following areas:

1. Clarify the difference between consulting party and concurring party for a Memorandum of Agreement (MOA).

The Advisory Council on Historic Preservation (ACHP) identifies signatories, invited signatories, and concurring parties as having different rights in the executing, amendment, and termination of Section 106 agreements. Per 36 CFR 800.6(c)(1), a signatory has the sole authority to execute, amend, or terminate an agreement. Signatories to our agreements are the Federal Highway Administration (FHWA), the State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), and the ACHP, if participating. Per 36 CFR 800.6(c)(2), an invited signatory has the authority to amend and terminate the agreement. The refusal of an invited signatory to sign the agreement does not prevent the agreement from being executed. Tribal nations are typically invited signatories for FHWA agreements on projects of tribal interest. An invited signatory cannot be assigned responsibilities in an agreement without their signature. Per 36 CFR 800.6(c)(3), a concurring party is a consulting party invited to concur in the agreement, but who does not have authority to amend or terminate an agreement. Concurring party signature is not required to execute an agreement. Concurring parties may be assigned responsibilities under the agreement upon their execution. Consulting parties are individuals or organizations with an interest in the preservation outcome of a project or who have an economic or legal interest in the properties that may be affected. Consulting parties are often the SHPO/THPO, local governments, Indian Tribes or Native Hawaiian Organizations or historic preservation groups.

2. Clarify if crash data supports the project's safety need.

With respect to your question concerning the safety analysis, the Needs and Deficiencies study conducted for the project included an analysis of crash data within the project limits. This study will be included in the Environmental Assessment (EA) Technical Appendices. In summary, the safety analysis was based on crash records in the Connecticut Crash Data Repository from January 2015 to December 2018. The crash history in the project area was compared against other locations along the Merritt Parkway portion of the Route 15 corridor. The highest density of crashes along the entire Merritt Parkway corridor occurs at the Exit 40 interchange with Main Avenue, which experienced more than 300 crashes within a 0.5-mile segment within the four-year analysis period.

3. Clarify if Alternative 21D was initially chosen as the selected alternative in past versions of the documentation.

It is correct that an alternative similar to Alternative 21D was previously identified as the preferred alternative in 2009. A number of refinements to the original "Alternative 21C" alignment concept were investigated and have been included in the revised alignment that is now designated as Alternative 21D in this EA/EIE. Alternative 26 was developed more recently through involvement of the current Project Advisory Committee (PAC).

4. Address the timing of the selection of an alternative, consideration for impacts to cultural sites in the selection of an alternative, and the timing for development of mitigation.

Ultimately, both of the build alternatives under consideration are seen to address the project need, and the National Environmental Policy Act (NEPA) EA seeks to identify benefits and adverse effects that differ in type and magnitude between the Build Alternatives in order to provide a basis for selection of a Preferred Alternative. Identification of the selected alternative is anticipated to occur within the EA published for public involvement.

As you are aware, under NEPA, the FHWA must consider potential impacts to many different types of natural and cultural resources, as well as the socioeconomic impacts of proposed projects. The goal is to balance these sometimes-competing interests to develop a project which minimizes overall environmental impacts.

Section 106 of the National Historic Preservation Act (NHPA) requires that FHWA take into account the effect of a proposed action on properties listed or eligible for listing on the National Register of Historic Places (NRHP), but does not require the selection of a particular alternative based solely on this evaluation.

Both of the build alternatives being analyzed propose an adverse effect on the NRHP-listed Merritt Parkway. Based on the current conceptual design, Alternative 26 would also impact two of three archaeological sites that were recommended as NRHP-eligible following Phase II testing. Alternative 21D is not anticipated to impact the archaeological sites.

Some of the areas in which Alternative 26 proposes minimal impacts when compared to Alternative 21D include: less direct impact to wetland resources and less increase in impervious cover within the watershed, less impact to wildlife habitat, and greater contextual cohesiveness within the NRHP-listed Merritt Parkway landscape.

With respect to archaeological sites within the project area, we welcome your input in development of the Section 106 Memorandum of Agreement so that it may best represent your interests in the event that identified sites cannot be avoided by construction of a selected alternative. As all three of these sites have been determined potentially eligible for NRHP listing under evaluation Criterion D (Properties that have yielded or may yield important information about prehistory or history) it is anticipated that an archaeological data recovery program will have the ability to provide appropriate mitigation for unavoidable impacts based on the project's final design under any alternative, or in the event of any unanticipated discoveries during project construction. FHWA welcomes your input with respect to ways we can incorporate your interests into any potential data recovery effort, or project design elements, should an impact occur.

Following publication of the EA, there will be a 45-day public comment period. A Public Hearing will be held during this time, you will again be invited to provide oral or written comment. All of the comments received during this period will be taken into consideration, and will be included in the final NEPA decision document. When a decision is reached, the resulting document will provide the basis for FHWA's action, and address the commitments made through the environmental review process.

- 5. Request that future correspondence fully respect the confidentiality of archaeological and cultural sites by not including site numbers on project maps.** FHWA will pass on your concerns to CTDOT regarding confidentiality and the use of archaeological site numbers in the public version of the archaeological investigation reports. FHWA acknowledges your desire to avoid inclusion of this information in order to provide an additional level of protection for sites, and will work with CTDOT to ensure the use of an alternate identification protocol for use in future documentation.

Thank you for your interest in this project and your time in providing input. I will continue to reach out to you through the NEPA process and look forward to your assistance in improving outcomes for this corridor.

Sincerely,

Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

FHWA/Mashantucket Pequot
Tribal Nation invitation to
meet 3/9/2022
May 2, 2022

September 2020 - FHWA CT Consultation - SPN 0102-0358 Norwalk – Improvements to Route 7 & 15 (Merritt Parkway)



emilie.holland@dot.gov

Mar 2, 2022, 3:59 PM

To: mejohnson@mptn-nsn.gov

Cc: mark.mcmillan@ct.gov kurt.salmoiraghi@dot.gov kevin.carifa@ct.gov

6 attachments - Expire: 1648875599000

Hello Michael,

Please find attached the responses from FHWA regarding the above referenced project, which your Office commented on in 2021.

In addition to the response letter, a copy of your July 29, 2021 correspondence, and a resubmission of the documentation included in the most recent submission to your office, are also attached.

A proposed agenda for our meeting, tentatively scheduled for 3/9/2022 at 2:00-3:30, was sent to you earlier this afternoon. This is one of the projects proposed for inclusion on the agenda. If you require any additional information please do not hesitate to contact me.

Kind Regards,

-Emilie Holland







PLEASE NOTE NEW OFFICE ADDRESS

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577

Environmental Protection Specialist | Federal Highway Administration

[Connecticut Division](#) | 450 Main Street - Suite 612, Hartford, CT 06103

File attachments expire: Apr 02, 2022

Name	Size	
 SPN 0102-0358 Response to Comments from MPTN.pdf	215.6 KB	f070280ac90503e18d044f31b0f158dfmd5
 2021_07_29 CT-FHWA 102-358 Merritt Pkwy Project.pdf	313.3 KB	121347325126b63e606f1e9ed3712f2amd5
 September 2020 Tribal Letter to Initiate Monthly Consultation statewide.pdf	227.3 KB	214866bfc74555504f24ba7611b0de45md5
 LETTER_toFHWA_Tribal-Consultation_Norwalk_102-358_20200922.pdf	2.9 MB	26894c3535ec2978cb3f20b3d59e42a4md5
 2020-8-24 FINAL 7_15 Public Phase I-II Report.pdf	62.0 MB	bf669d7c3977480a3e11a96d9d21c694md5
 §106-APPENDIX-B_Norwalk_102-358_20200921.pdf	2.7 MB	49875bd4ee971ae3957c6d33a2de980amd5



U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

2 March 2022

450 Main Street
Suite 612
Hartford, CT 06103
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HEO-CT

Dear Mr. Johnson;

The Federal Highway Administration (FHWA) Connecticut Division Office has previously consulted with your Office regarding State Project Number (SPN) 0102-0358, which proposes to address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue, in the City of Norwalk, Fairfield County, Connecticut. The proposed project anticipates the use of both federal and state funding, and requires compliance with Section 106 of the National Historic Preservation Act.

In March 2016, your office received an initial invitation to participate in the Section 106 consultation process for the current project. Since that time, FHWA has provided additional documents relating to archaeological investigations which have been conducted. Concurrent with the Section 106 evaluation, an Environmental Assessment / Environmental Impact Evaluation (EA/EIE) document is being prepared for State Project #0102-0358 in an effort to analyze the broader environmental impacts of proposed project alternatives in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

The most recent submission to your Office, in September 2020, included the Public Report of the Phase I & II Cultural Resource Surveys, which establishes the project's Area of Potential Effect (APE) for the alternatives identified for further study in the EA/EIE. In accordance with an existing Programmatic Agreement between FHWA, CTDOT, and the Connecticut State Historic Preservation Office (CTSHPO), CTDOT has completed the identification of Section 106 resources within the project's APE. The Merritt Parkway Historic District, including five (5) historic bridges, the Verneur Pratt historic District, the Glover Avenue Bridge, and three (3) Archaeological Sites have been identified within the APE. Based on this information CTDOT and FHWA anticipate a finding of *adverse effect* for each of the project build alternatives.

FHWA is in receipt of the Mashantucket Pequot Tribal Nation Tribal Historic Preservation Office (THPO)'s July 29, 2021, correspondence relating to the above referenced project. A copy of your comment letter is attached for your reference. If you require resubmission of any project related documentation, please let us know.

In addition to the responses to your comments, included below, and in consultation with the FHWA's Federal Preservation Officer, the FHWA Connecticut Division Office proposes to host a meeting with representatives of your office and the Connecticut Department of Transportation (CTDOT) Office of Environmental Planning, to discuss the details related to this project.

FHWA appreciates that the identification and understanding of potential impacts to historic resources would not be complete without the tribal perspective. The Phase I/II survey report prepared by AHS

that accompanied the September 2020 Section 106 letter was the public version of the report. In April, 2019, the THPO was provided with the full report for review along with an invitation to share traditional knowledge insights.

The unabridged report has not been shared publicly by FHWA, but rather has only been sent to our Tribal partners. CTDOT has provided a copy directly to CTSHPO for review and comment. The unabridged version contains information on the nature and location of the survey work and is not intended to be made public, in an effort to protect the resources discussed. The Public report has been edited so that the methodology and findings are only summarized, rather than explicitly described. CTDOT can amend the public report to acknowledge and incorporate historical information you choose to share. Alternatively, a statement that recognizes it is incomplete without a tribal perspective may be provided.

CTDOT has completed the Section 106 evaluation based on the assumption that the sites identified by their archaeological consultant, Archaeological and Historical Services, Inc. (AHS), are eligible for listing on the National Register of Historic Places (NRHP). As such, these resources are afforded the same level of protection as listed properties.

At this time there is no active field survey work or testing underway for this project, however, project alternatives under consideration may require additional archaeological work within the APE. FHWA and CTDOT are in agreement with your recommendation that data recovery would only be considered if the historic sites are at risk of imminent destruction. Before making such a decision, CTDOT and FHWA will continue to consult with the Tribes, as well as other project stakeholders, and look for ways to avoid or minimize impacts to historic sites.

Again, we thank you for sharing your knowledge and recommendations regarding this project. At your convenience, we would like to continue this discussion regarding the project and the practice of identifying and protecting historic sites in general. If there is additional information you need from us, please let us know.

Consultation Initiation

With this letter, the FHWA continues to invite your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation project.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Emilie Holland by telephone at 860-494-7577 or by email at: emilie.holland@dot.gov.

Please contact me to discuss your upcoming availability and preferred meeting platform. If you would prefer to meet in-person, please let me know so that I can investigate that possibility. We respectfully request that you contact FHWA at your earliest convenience to confirm a meeting time and venue. If you have any questions, please do not hesitate to contact me.

Sincerely,

Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

FHWA notification to ACHP of
Adverse Effects
October 1, 2021

From: [Holland, Emilie \(FHWA\)](#)
To: e106@achp.gov
Cc: david.clarke@dot.gov; mranslow@achp.gov; [McMillan, Mark J.](#); [Salmoiraghi, Kurt \(FHWA\)](#); [Carifa, Kevin F.](#); [Kinney, Jonathan](#)
Subject: FHWA CT Division - ACHP Case #014039 Notice of Potential Adverse Effect - FAP #0015(133) (CTDOT/State Project #0102-0358)
Date: Friday, October 1, 2021 12:55:11 PM

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.



emilie.holland@dot.gov sent you a secure message

[Access message](#)

Good Afternoon, The Federal Highway Administration, Connecticut Division, is notifying the ACHP that State project #0102-0358 Route 7 / 15 I..

Secured by Accellion



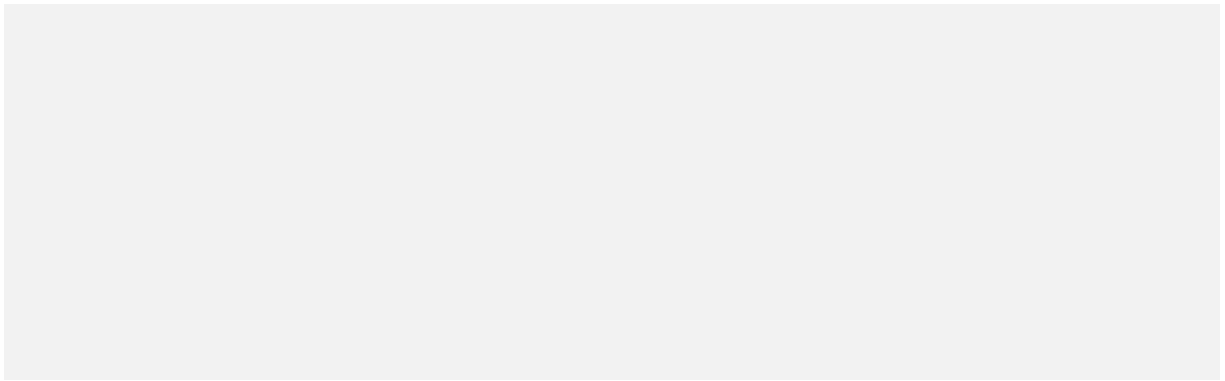
Attachments expire on Oct 31, 2021



5 PDFs

FHWA CT - SPN 0102-0358_FAP 0015(133)_ACHP 014039.pdf, Appendix-A_7-15_APE.pdf, Appendix-B_§106-Eval_102-358_20200921.pdf, Appendix-C_SHPO Consultation_Norwalk-102-358.pdf, Appendix-D_Tribal Consultation_Norwalk-102-358 w MPTN.pdf

This message requires that you sign in to access the message and any file attachments.



Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☐ Invite the ACHP to participate in a Section 106 consultation
- ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☒ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe
Click here to enter text.

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): **Case # 014039**

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

4. Name of undertaking/project (Include project/permit/application number if applicable):

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

6. Name and title of federal agency official and contact person for this undertaking, including email

address and phone number:

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The Connecticut Department of Transportation (CTDOT) proposes to construct improvements at the Route 7 and Route 15 (Merritt Parkway) interchange and to improve Route 7/Merritt Parkway interconnections with local roads in the City of Norwalk, Connecticut. The principal elements of the Project are designed to provide a full interchange with direct access between Route 7 and the Merritt Parkway and to improve traffic operations and safety at the Merritt Parkway and Main Avenue interchange as well as along Main Avenue and Glover Avenue in the vicinity of the interchange.

The FHWA is providing federal funds for the project and is the lead federal agency for the NEPA Environmental Assessment that is being conducted concurrently with the Section 106 evaluation of this undertaking.

8. Describe the Area of Potential Effects (APE):

The APE includes Interchanges 39 (Route 7 and Route 15) and 40 (Route 15 and Main Street) as well as a mile-long segment of Route 15 (east to west) and Route 7 (north to south). The APE was developed to encompass the alternatives being evaluated under NEPA and account for indirect impacts including noise and visual changes to setting. The APE is shown on mapping included in Attachment A.

9. Describe steps taken to identify historic properties:

In conjunction with the Environmental Assessment analysis conducted in accordance with NEPA, a Phase I and II Cultural Resources Report was prepared for the project which evaluated an APE the encompassed all of the alternatives under consideration. Work included defining the project APE, surveying the above-ground properties and conducting archaeological investigations. A literature and map review was undertaken at the State Historic Preservation Office (CTSHPO) and a site visit took place to verify the presence or absence of above and below ground resources. The Report was developed in consultation with the CTSHPO and reviewed by the §106 Consulting Parties, which included the National Trust for Historic Preservation and the ACHP.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Within the Project APE are eight historic properties. Two are listed on the NRHP: the Merritt Parkway (NPS #91000410, listed 4/17/1991); the Verneur Pratt Historic District (NPS #11000434, listed 7/19/2011). The other six are NRHP-eligible: Glover Avenue Bridge #04155, 2 Singing Woods Road, 129 Perry Avenue, and three (3) pre-contact Archaeological Sites (# 103-57, #103-58-60, and #103-61/62). Please see Attachment B – *Section 106 Evaluation of State Project No. 102-358 (9/21/2020)*.

11. Describe the undertaking's effects on historic properties:

Both of the build alternatives under consideration will have an unavoidable adverse effect to elements of the Merritt Parkway and the Glover Avenue Bridge. However, the project also presents opportunities to restore or enhance historic elements of the Merritt Parkway which have been diminished by time and encroachment of developments. These opportunities have been explored in consultation with the project's Project Advisory Committee (PAC).

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

Of the 8 historic properties identified in the project APE, 4 are anticipated to be adversely affected by one or more of the alternatives under consideration. Direct and indirect adverse effects to the Merritt Parkway include: demolition/replacement of Bridges #0530A/B and indirect impacts to Bridge #00720 and #00721 caused by reduced visibility of these contributing features. Changes to the design and setting are also anticipated. The Glover Avenue Bridge will be demolished/replaced (direct impact). One of the alternatives under consideration (Alternative 26) will directly impact Archaeological Sites #103-57 and #103-58/60. Please refer to Attachment B, which provides a thorough description of the each of the undertaking's alternatives effects on the historic resources.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

SHPO coordination can be found in Attachment C. Tribal consultation completed to date is included in Appendix D. The Federally recognized Tribes with an interest in the project area were most recently invited to consult on this project in September 2020. To date, the Mashantucket Pequot Tribal Nation and the Delaware Nation have both communicated an intent to participate in Consultation on the project. The remaining Tribes - The Mohegan Tribe, the Narragansett Tribe, and Delaware Tribe - have not responded. This consultation is currently considered to be "paused" or "tolled" due to the current National Health Emergency.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

Throughout the process of the EA/EIE, CTDOT has identified and engaged stakeholders through a Project Advisory Committee (PAC). Within the PAC is a subcommittee focusing on cultural and landscape design issues. The members of this subcommittee include representative of each of the §106 Consulting Parties. The ACHP has also been an active Consulting Party to this undertaking and has participated in project meetings and provided review and comments on the project's Public Report.

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

Yes. The website URL is: <http://7-15norwalk.com>. The website includes news and updates, an archive of past newsletters and planning documents and has contact information for the project team.

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

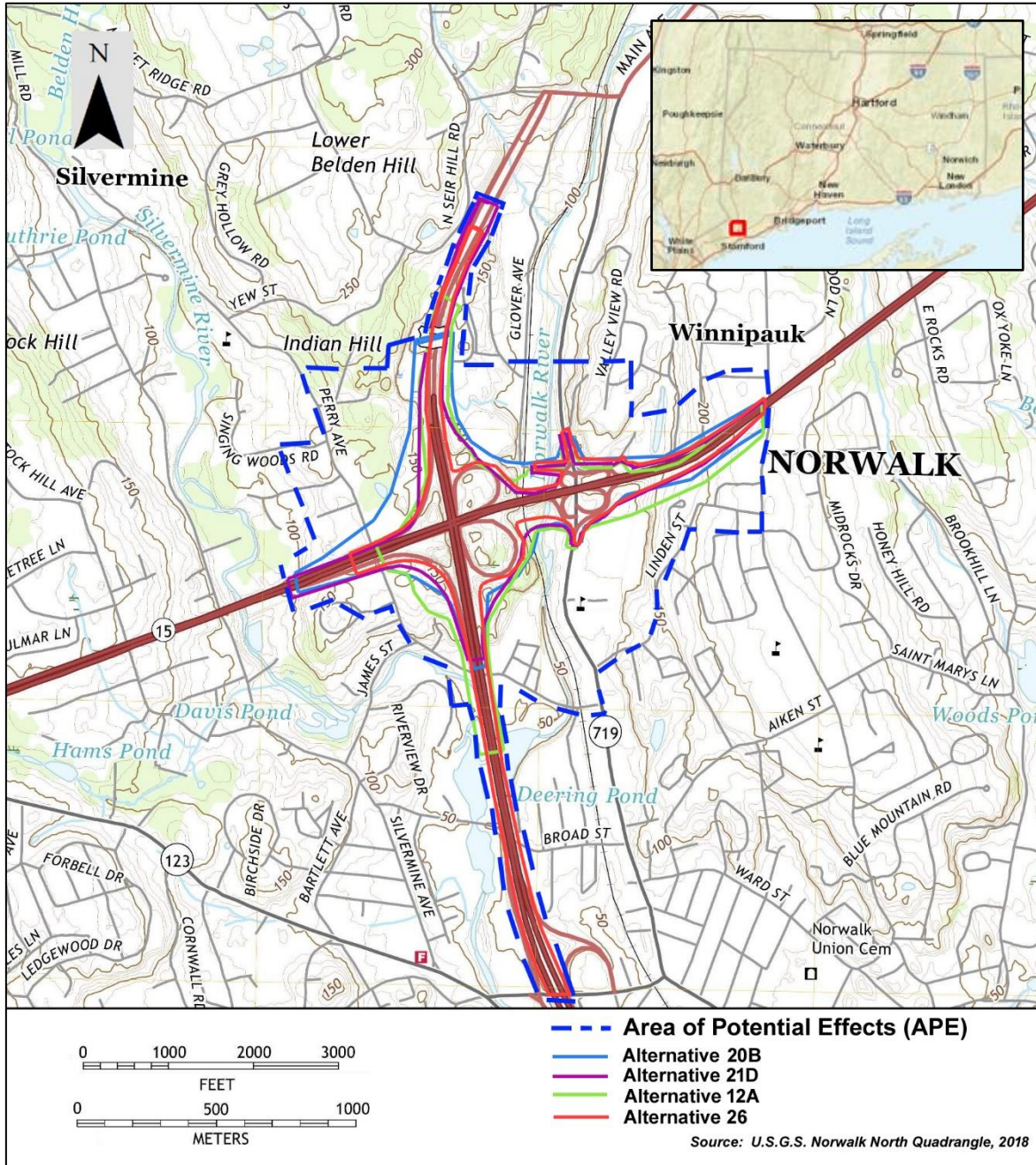
[Completion of the Route 7 and Route 15 Interchange | Permitting Dashboard \(performance.gov\)](#)

The following are attached to this form (check all that apply):

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☒ Additional historic property information
- ☒ Consulting party list with known contact information
- ☐ Other: [Click here to enter text.](#)

Appendix A - Project Location and Area of Potential Effects

State Project 103-258 Route 7 / 15 Interchange Improvements





STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION

**2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546**



Transmittal:

From: Lucas A. Karmazinas
Date: September 21, 2020
Through: Robert Bell, Director, CTDOT Bureau of Policy & Planning
To: Jonathan Kinney, Deputy State Historic Preservation Officer

Project: State No.: 102-358
F.A.P. No.: 0015(133)
Project Title: Route 7/Route 15 Interchange Project
Town: Norwalk

Subject: SHPO Consultation Documentation

Description of Activity

The Connecticut Department of Transportation (CTDOT) is currently evaluating a project that will address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in Norwalk. The Merritt Parkway was developed as Connecticut's first divided-lane, limited access highway between 1934 and 1942 and it extends 37.5 miles from the New York border in the west to Stratford in the east. The Merritt Parkway was listed in the National Register of Historic Places as a historic district in 1991 and is significant at the national level under Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (embodying the distinctive characteristics of a type, period or method of construction, or possessing high artistic values).¹

The Merritt Parkway's interchange with Main Avenue (Interchange No. 40) was included as part of the parkway's original design, however, the interchange with Route 7 (Interchange No. 39) was not constructed until 1990. This being said, Interchange No. 39 provides only partial connections between the two highways and, as a result, linkages to and from the north are not provided. On the other hand, connections in all directions are presently available at Interchange No. 40, which is located approximately 1500' east of Interchange No. 39 (Image 1). The proposed State Project #102-358 seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40.

¹ National Park Service, *Merritt Parkway* (NPS #91000410), listed April 17, 1991.

Because the proposed project anticipates the use of both federal and state funding, it falls under the purview of the National Historic Preservation Act (NHPA). “Section 106” is the clause of the NHPA that mandates federal agencies to consider the effects of an undertaking on historic properties. The process is codified in 36 CFR 800.1-16, and is often referred to colloquially as “Section 106”.

Concurrent with the Section 106 evaluation, an Environmental Assessment / Environmental Impact Evaluation (EA/EIE) document is being prepared for State Project #102-358 in an effort to analyze the broader environmental impacts of proposed project alternatives in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

The EA/EIE will evaluate the impacts of the project on the man-made, social, and natural environments and will recommend the preferred alternative of action. It is currently considering three alternatives that consist of a “No Build/No Action” option and two “build” alternatives that will entail construction actions. This document will evaluate the build alternatives impacts specifically as they impact historic properties (above- and below-ground) in accordance with the provisions of Section 106 of the National Historic Preservation Act. The information provided by this review process will complement other analyses that are being conducted under NEPA/CEPA.

Each of the alternatives have been developed in association with a public stakeholder group and were presented at a public meeting conducted in 2017. CTDOT invited representatives from the Merritt Parkway Conservancy, a Project Advisory Committee, and the public to participate in the PAC meetings, and to provide input on both historic/cultural considerations as well as the environmental impacts as a whole.

Technical Review of Project

The Merritt Parkway is a divided-lane, limited access highway with two primary travel lanes in each direction (northbound and southbound). It was constructed by the State of Connecticut between 1934 and 1942 and travels on a roughly southwest to northeast course over its 37.5-mile traverse between the New York State border and Stratford, respectively. Conceived as both a high-speed transportation corridor and naturalistic landscape, the Merritt maintains a 300'-wide right-of-way (ROW) throughout its length, this providing for carefully designed sweeping curves, long-framed vistas, and a wide median and shoulders initially planted with tens-of-thousands of native trees, shrubs, and other flora.

The Merritt Parkway is also notable for its prominent over- and underpasses, of which 36 of each were originally constructed. The bridges were designed by George L. Dunkelberger, Senior Draftsman and, after 1941, the Connecticut Highway Department's Highway Architect. They feature a mix of Art Deco, Moderne, and historical revival styles, and employed cast, colored, and sgraffitto concrete and detailed ironwork. Architecturally significant works of art in their own right, the Merritt's bridges both accentuate the visual character of the parkway and blend into its naturalistic landscape.

The aforementioned developmental background and design details resulted in a historically and architecturally significant resource that justified the Merritt Parkway's inclusion on the National Register of Historic Places under Criteria A and C in 1991. Its areas of significance include Transportation (as a largely intact example of a 20th-century parkway), Architecture (for its historic bridges and rest areas), and Landscape Architecture (as a significant work of naturalistic landscape architecture). This being said, a Public Report summarizing Phase I and II Cultural Resources Surveys prepared as part of State Project #102-358 (Public Report) notes that the parkway has undergone a litany of changes since its opening in 1942.² These include "added lanes, inconsistent signage and guiderail treatments, reduction of the median, development proximity to the right-of-way, and inappropriate, lost, or overgrown plantings."³ The alterations, the report notes, however, have not compromised the overall historic character and integrity of the Merritt Parkway or, more specifically, the portion of the parkway to be potentially impacted by State Project #102-358.

As noted, the proposed undertaking seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40. At present, Interchange No. 39 provides connections only from:

- Route 7 northbound to the Merritt Parkway southbound.
- Route 7 southbound to the Merritt Parkway southbound.
- Merritt Parkway northbound to Route 7 northbound.
- Merritt Parkway northbound to Route 7 southbound.

As a result:

- Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road.
- Merritt Parkway northbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue.
- Route 7 motorists have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

On the other hand, full connections are provided between the Merritt Parkway and Main Avenue at Interchange No. 40, which would allow for use of, or integration with, aspects of this feature in implementing full connectivity between the Merritt Parkway and Route 7. A full outline of the proposed alternatives and their potential impacts on historic resources is described below in "Alternatives Under Consideration."

² Archaeological and Historical Services, Inc., *Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut*, prepared for Stantec, December 13, 2018, Updated May 15, 2020 (See Appendix A).

³ Archaeological and Historical Services, Inc., p. i.

The need to improve Interchange No. 39 became apparent not long after its initial completion. A new alternative that provided connections in all directions between the Merritt Parkway and Route 7 was designed and approved in the late 1990s, with initial construction taking place in 2005. This work was halted in 2006, however, after the Federal Highway Administration (FHWA) was successfully sued under Section 4f of the U.S. Department of Transportation Act of 1966 due to the implications of the project. Public consensus on a new design alternative was reached in 2009, yet a lack of funding prevented the project from moving forward at that time. Public coordination and further modifications to the design under the present project were initiated after federal and state funds were secured in 2016.

Project Site and Area of Potential Effects (APE)

The APE is the geographical space in which an undertaking may create changes to a historic property's character or use. According to Section 106 regulation 800.5, "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."⁴ As State Project #102-358 is currently in its preliminary design phase, the Project Site for the purposes of this review and the Phase I and II Cultural Resources Surveys consists of the greatest possible footprint of construction activities (direct effects) for all four design alternatives presently under consideration (Image 2), while the Area of Potential Effects (APE) consists of the greatest possible extent of direct and indirect effects, the latter including visual, noise, vibration, air quality, and traffic effects resultant of the proposed work (Image 3). It was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys, however, that indirect effects on air quality, noise, traffic, and vibration resultant of all of the design alternatives would be negligible.⁵ Each of the alternatives would provide improvements in the existing conditions such as air quality and traffic congestion when compared to the "no build" alternative of not taking action.

The Public Report outlines the methodology used to define the project's APE and to identify historic resources that might be potentially impacted by the project. Subsequent evaluation of project's construction (direct) and visual (indirect) effects revealed the presence of six additional Historic Properties within the APE that may be affected by the proposed project. These properties are:

Merritt Parkway Historic District

Connecticut's first divided-lane, limited access highway, alternately identified as Route 15. Built between 1934 and 1942, it extends 37.5 miles from the New York State border to Stratford.

⁴ Archaeological and Historical Services, Inc., p. 4.

⁵ Archaeological and Historical Services, Inc., p. 5.

It was listed in the National Register of Historic places in 1991 under Criteria A and C and retains its overall historic character and integrity despite various alterations over the almost 80 years since its completion.

The portion of the Merritt Parkway located within the APE extends 1.5 mile and includes five historic bridges that contribute to the Merritt Parkway Historic District. From west to east they consist of the:

- Perry Avenue Bridge (#00719) – Single-span, rigid-frame concrete bridge with arched opening built in 1936 to carry the Merritt Parkway over Perry Avenue (Image 4). It bears stylistic influences of the Art Moderne and Modern Classicism and features a concrete balustrade with a bas-relief cartouche of the Connecticut State Seal on the interior face of the northeast pylon. The bridge retains its historic character and physical integrity, however, the visual setting has been heavily impacted by the construction of flanking concrete and steel girder bridges erected as part of the Route 7 and 15 interchange project in 1990.
- Metro-North Railroad Bridge (#00720)(aka Winnipaug Railroad Bridge) – Single-span, rigid-frame, reinforced concrete bridge with arched opening built in 1937 to carry the Merritt Parkway over the Metro-North Railroad (Image 5). Utilitarian design with plain concrete abutments and wingwalls. Retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- Main Avenue Bridges (#00530A & #00530B) – Twin single-span, rigid-frame concrete bridges with arched openings and random rubble facing built in 1937 to carry the Merritt Parkway over Main Avenue (Image 6). Designed in a mixed Classical Revival and Rustic style with granite voussoirs, quoins, and coping. The northern parapet and northeast wingwall of Bridge #00530B (the northern span) were replaced in kind in 2015 and 2016, however, the bridges retain their historic character and physical integrity despite the rehabilitation and other changes to their visual setting resultant of commercial development to the north and south.
- Norwalk River Bridge (#00721) – Three-span, reinforced concrete arch bridge built in 1938 to carry the Merritt Parkway over the Norwalk River (Image 7). Utilitarian design with wide raised bands in each arch and the parapets. While the bridge was rehabilitated in 1988, it retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- West Rocks Road Bridge (#00722) – Single-span, steel, rigid-frame bridge with segmental-arch opening built to carry West Rocks Road over the Merritt Parkway in 1937 (Image 8). Designed in a mixed Moderne and Neoclassical style with ornamental metal railings and crenellated parapet. The bridge's rehabilitation in 2018 was determined to result in No Adverse Effect and, as such, the bridge retains its historic character and physical integrity.

The Public Report notes that the portion of the Merritt Parkway located within the APE has experienced numerous changes to its structures, landscape, and setting, yet it retains its overall historic character. The report reads,

The western portion of the Parkway within the APE today mostly resembles a modern interstate highway rather than a scenic parkway. It features typical modern entrances, exits, and signage and lacks historic elements found throughout the rest of the Parkway, such as a wide landscaped median. The easternmost portion of the APE, east of the Main Avenue interchange, retains more of the Parkway's historic character, derived from the planted median strip, narrow verges, and close-to-the-road landscaping. At a closer level of detail, however, exceptions can be found within these generalizations. For example, in the more highly altered western portion of the APE, there is a typical Parkway rock cut close to the roadway, at the southbound on-ramp from Route 7 North, and there is a small group of trees in the median as the roadway ascends toward the Perry Avenue undergrade bridge that is not unlike the original Parkway treatment. The overall geometry of the eastern portion of the APE is more intact, but details such as modern signage, condition of the vegetation, and modern guiderails reduce the experience of the original Parkway concept. Long views in the eastern portion reveal the dense modern commercial, office, and residential development that surrounds this portion of the Parkway.⁶

The aforementioned conditions are more comprehensively laid out in the Public Report and are based upon evaluation of eight critical components of the parkway's original design. They include roadway width, median and verges, alignment, vegetation, bridges, signage, guiderails, and views. The relevant evaluation can be found on pages 32-34.

Verneur Pratt Historic District

The Verneur Pratt Historic District is located at 144-116 Pratt Avenue and was listed on the National Register of Historic Places in 2011 (Image 9).⁷ It is comprised of a Georgian-style residence built ca. 1788 and a ca. 1800 barn associated with scientist Verneur E. Pratt, who purchased the property during the early 20th century. The historic district is located approximately 0.25-mile north of the Pratt Avenue bridge and retains its historic character and physical integrity.

Glover Avenue Bridge (#04155)

The Glover Avenue Bridge (aka Belden Hill Avenue Bridge) is a two-span, stone-arch bridge built by the City of Norwalk to carry Glover Avenue (originally Belden Hill Avenue) over the Norwalk River in 1912 (Image 10). The bridge is constructed of rubble fieldstone and is accented with brownstone voussoirs and coping.

⁶ Archaeological and Historical Services, Inc., p. 30.

⁷ National Park Service, *Verneur Pratt Historic District (NPS #11000434)*, listed July 19, 2011.

It was determined eligible for the National Register of Historic Places by CTSHPPO following documentation as part of the statewide bridge inventory completed in 1991 and was the subject of State-Level Documentation prepared under a previous iteration of State Project #102-358 in 2000.⁸ The bridge retains its historic character and physical integrity.

Archaeological Site 103-57

Archaeological Site 103-57 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D (Information Potential) as part of Phase II testing.⁹ It consists of a Middle/Late Archaic, or possibly Woodland-Age, site located within the Project Site.

Archaeological Site 103-58/60

Archaeological Site 103-58/60 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹⁰ It consists of a combined Late Archaic/Pre-Colonial site located within the Project Site.

Archaeological Site 103-61/62

Archaeological Site 103-61/62 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹¹ It consists of a combined Pre-Colonial/Middle Archaic site located within the Project Site.

Coordination and Consulting Parties

As noted, litigation halted a previous attempt to redesign the Merritt Parkway/Route 7 interchange in 2006. Subsequently, a public stakeholder group was organized, which, along with representatives from the Merritt Parkway Conservancy, public agencies, and other interested parties, would evaluate and vet possible design alternatives. Consensus on such a design, Alternative 21C, was reached following a public meeting in 2009, yet a lack of funding prevented the project from going to construction.

⁸ Bruce Clouette and Matthew Roth, *Connecticut Historic Bridge Survey; Inventory-Phase Final Report: Project Narrative, Inventory and Recommendations*, submitted to the Connecticut Department of Transportation Office of Environmental Planning, December 1990; Bruce Clouette, *Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut*, prepared April 2000 (See Appendix B).

⁹ Archaeological and Historical Services, Inc., p. 15.

¹⁰ Archaeological and Historical Services, Inc., p. 15.

¹¹ Archaeological and Historical Services, Inc., p. 15.

Federal and state funds for continued design efforts were secured in 2016, however, at which time a series of new alternatives were designed and presented for assessment by the consulting parties (including federally-recognized tribes, the Merritt Parkway Conservancy, the Project Advisory Committee, public agencies, and the public). The preferred options were presented via a project website launched in the fall of 2017, and a public scoping meeting held on October 17, 2017. The results of the scoping process can be found in a summary report prepared by FHWA and CTDOT, although the vetting of the preferred option(s) is ongoing.¹²

Alternatives Under Consideration and Potential Impacts on Historic Properties

The purpose of State Project #102-358 is to address the existing deficiencies of the Merritt Parkway's Interchange No. 39. The goal of the project is to provide for access in all directions between the Merritt Parkway and Route 7 and, as a result, improve operations and reduce congestion on Main Avenue, which currently supplements the lack of connectivity at Interchange No. 39. Two alternatives are currently being evaluated as part of the development of the EA/EIE document. Each of the alternatives will be briefly described here and evaluated with regard to their impacts specifically to historic properties. Adverse effects are the result of an undertaking altering the qualities that make a property "historic". An adverse effect will diminish one of more of the aspects of an historic property's integrity, thereby weakening the property's ability to demonstrate a connection to the past.

More detailed descriptions of the alternatives can be found in the Public Report. It should be noted that four design alternatives are described here. The Public Report was developed to provide information regarding the historic and cultural resources within the project APE. When the Public Report was initiated, four alternatives were under consideration. During the NEPA/CEPA analysis process and in conjunction with input from the Project Advisory Committee, two of the alternatives (12A and 20B) have since been removed from consideration. A brief description of them is included in this letter so that it is consistent with the Public Report.

Alternative 12A

Alternative 12A would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 11). The reconfiguration would involve elimination of the existing loop ramps at Interchange No. 40, construction of four new modified diamond interchange ramps, construction of roughly 20 new or replacement bridges, and construction of new Merritt Parkway and Route 7 on- and off-ramps. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

¹² Federal Highway Administration and Connecticut Department of Transportation, *Scoping Report: Route 7/15 Interchange Project, Norwalk, Connecticut*, prepared January 2019.

Impacts on Historic Properties resultant of Alternative 12A include demolition of both Main Avenue Bridges (#00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It would also introduce elevated ramps that, along with other changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting, could result in a loss of integrity in terms of material, design, feeling, and association. The construction of ramps that were elevated above the Merritt Parkway was found to be a critical flaw in this alternative and consequently, Alternative 12A was removed from further evaluation.

Alternative 20B

Alternative 20B would provide for the four lacking connections at Interchange No. 39 by eliminating the two direct ramps in the western quadrants of Interchange No. 39 and establishing new semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 and construction of a system of signal-controlled intersections and ramps (Image 12). The reconfiguration would involve replacement of three of the Interchange No. 39 ramps, all the existing Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 20B include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association, although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. Archaeological Sites 103-57 and 103-58/60 would not be affected by Alternative 20B.

Each alternative was evaluated on its capacity to meet the purpose and need as well as the desirable outcomes of the project. Since the Public Report study commenced, it was determined that Alternative 20B did not sufficiently meet the desirable outcomes of the project. It was removed from further consideration.

Alternative 21D

Alternative 21D would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 13). The reconfiguration would involve elimination of three of the Interchange No. 39 ramps and all of the Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 21D would include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. None of the National Register-eligible archaeological sites located in the Project Site will be affected by Alternative 21D.

Alternative 26

Alternative 26 would provide for the four lacking connections at Interchange No. 39 by introducing signalized intersections on Route 7 and establishing semi-direct connections with Interchange No. 40 through the reconfiguration of both Interchanges No. 39 and No. 40 (Image 14). The reconfiguration would involve elimination of all of the existing ramps at both interchanges, construction of new modified diamond interchange ramps in all but the heavily-traveled Route 7 northbound to Merritt Parkway westbound movement, which will require a loop ramp, and construction of roughly six new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 26 include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B), and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association. Unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. The ramps required by Alternative 26, however, would be shorter than those employed by the other alternatives, thus resulting in a lesser overall effect on the designed landscape. Alternative 26 will directly impact Archaeological Sites 103-57 and 103-58/60, yet would not result in effects to Site 103-61/62.

Recommendation

State Project #102-358 is the subject of both an Environmental Assessment under NEPA and a Section 106 review under the National Historic Preservation Act. At this time, a preferred alternative has not yet been identified from among the four under consideration. Construction of any of the design alternatives will create indirect impacts on the area in regard to air quality, noise, traffic, and vibration, however, it was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys that these effects would be negligible. In accordance with Section 106 of the National Historic Preservation Act, CTDOT offers the following recommendations of effect on historic properties caused by each of the alternatives relative to direct or visual (indirect) effects:

Alternative 21D

Alternative 21D will change the historic integrity of the Merritt Parkway and the Glover Avenue Bridge, yet will not affect any of the NR-eligible archaeological sites located within the project area. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 21D will be at or below the level of the Merritt Parkway. Regardless, this design will still constitute an *adverse effect to historic properties*.

Alternative 26

Alternative 26 will change the historic integrity of the Merritt Parkway, the Glover Avenue Bridge, and Archaeological Sites 103-57 and 103-58/60. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 26 will be at or below the level of the Merritt Parkway and all of the new ramps will be shorter than those required by the other alternatives. Regardless, this design will still constitute an *adverse effect to historic properties*.



Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation

Attached Documents:

☒ **Historic Review Map**

☒ **Supporting Documents**

- Appendix A – Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut.
- Appendix B - Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

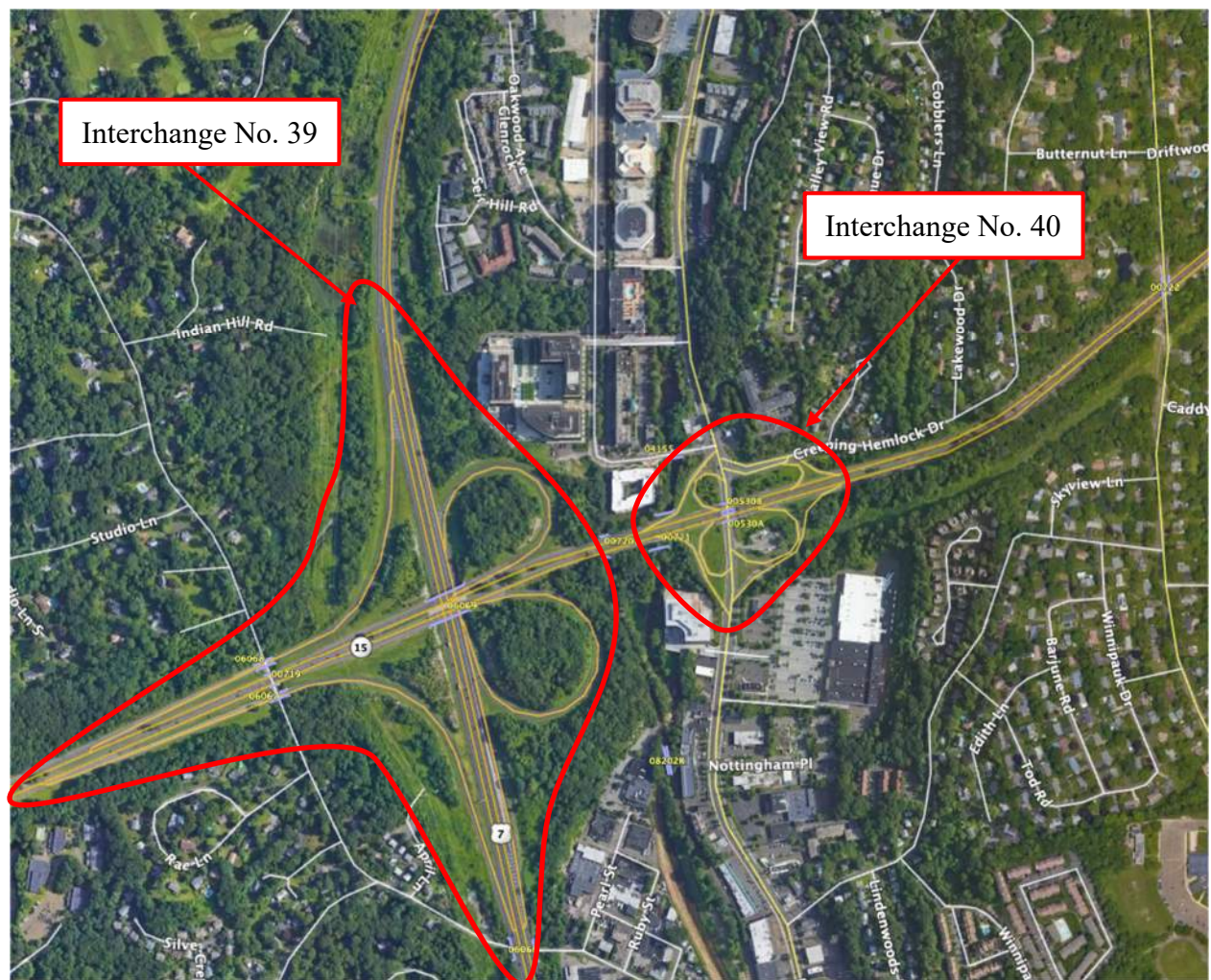


Image 1: Google Earth aerial image (2020) showing the Route 15 (Merritt Parkway) interchanges with Route 7 (Interchange No. 39) and Main Avenue (Interchange No. 40) in Norwalk.

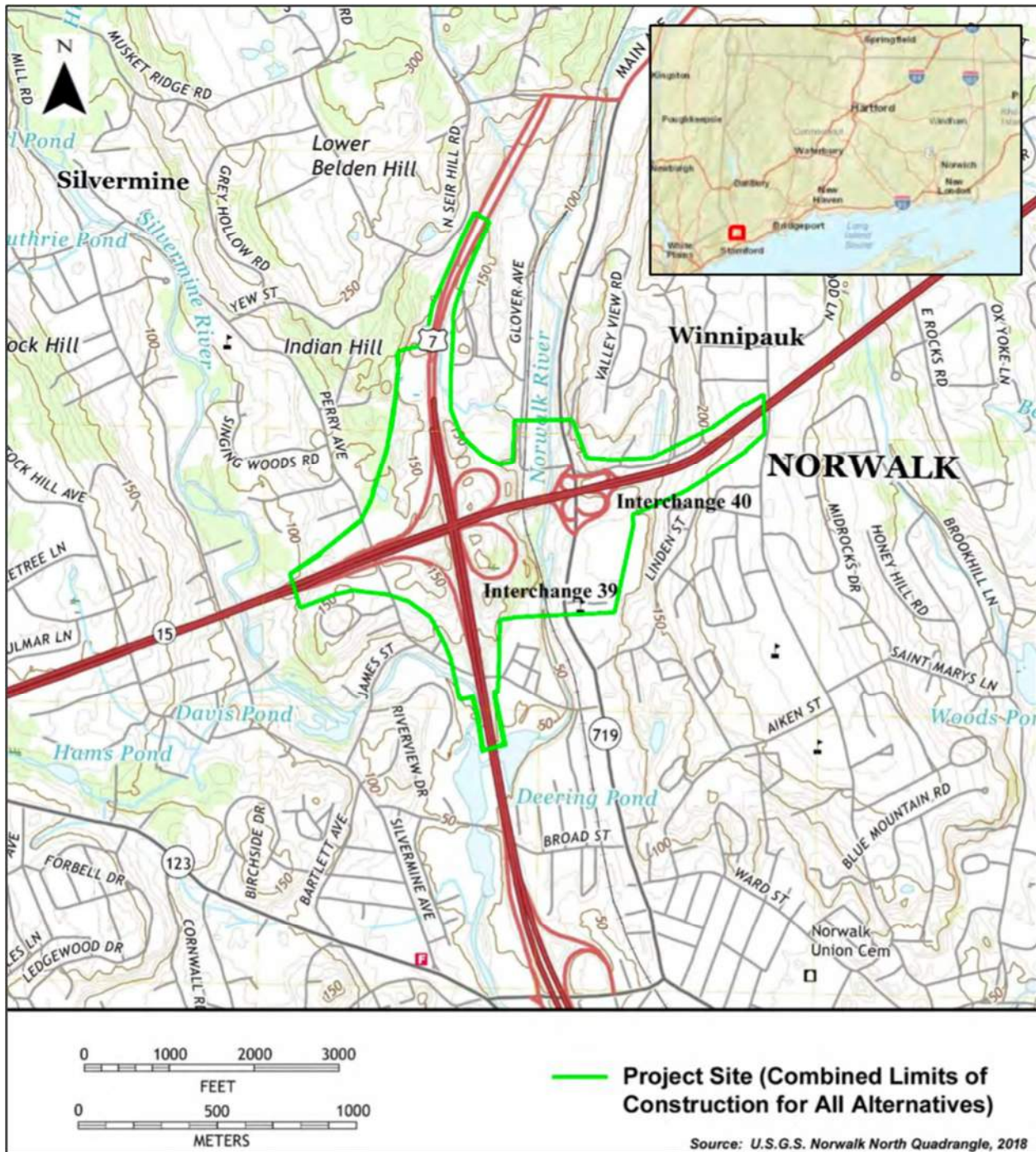


Image 2: Image showing the Project Site, which has been identified as the maximum combined limits of construction activities (direct effects) for all design alternatives.

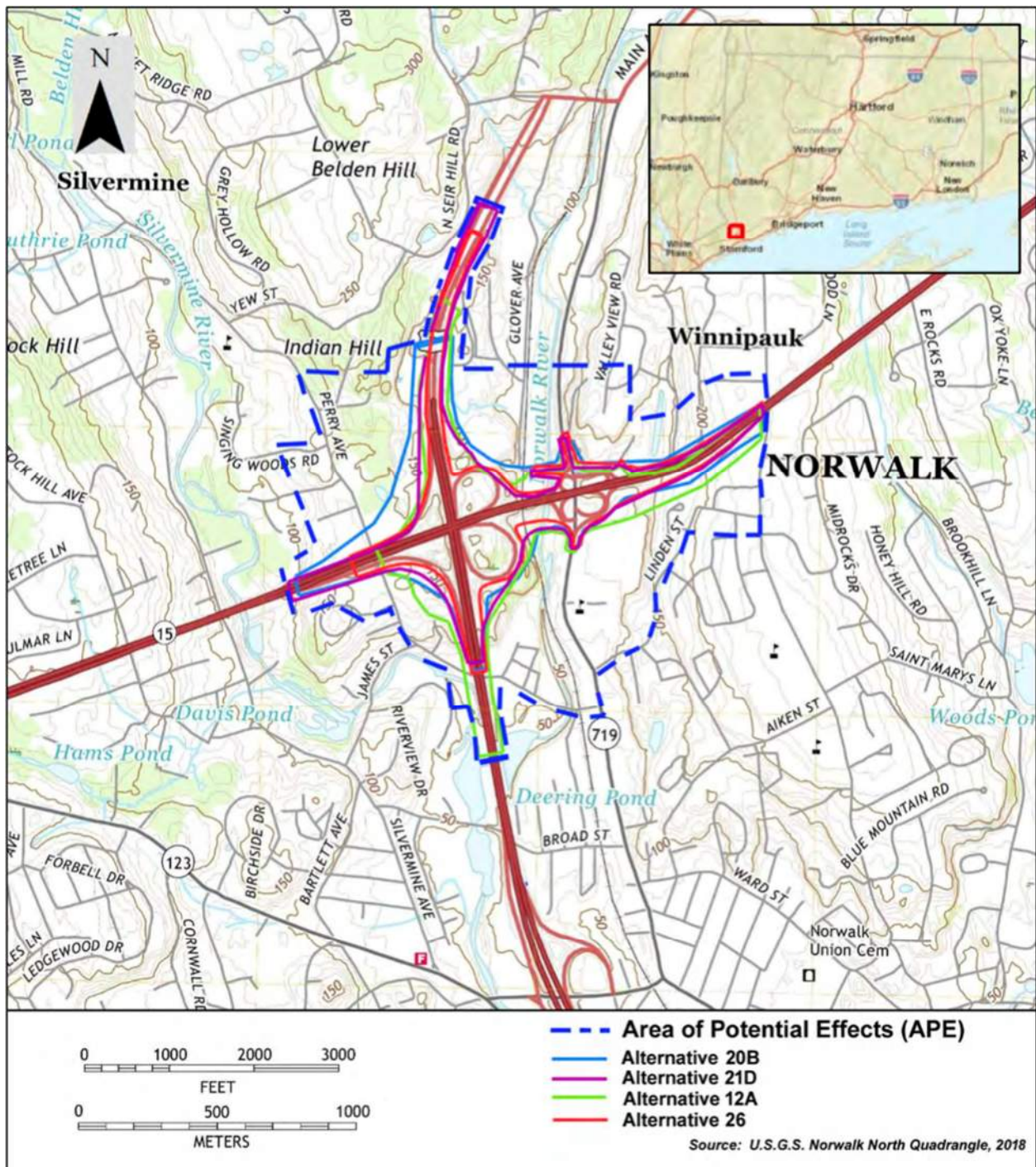


Image 3: Image showing the Area of Potential Effects (APE), which has been identified as the maximum combined limits of direct and indirect effects for all design alternatives.



Image 4: Photograph of the Merritt Parkway Perry Avenue Bridge (#00719) from Perry Avenue. Facing south.



Image 5: Photograph of the Merritt Parkway Metro-North Railroad Bridge (#00720) from the Metro-North Railroad. Facing north.



Image 6: Photograph of the Merritt Parkway Main Avenue Bridges (#00530A & #00530B) from Main Avenue. Facing north.



Image 7: Photograph of the Merritt Parkway Norwalk River Bridge (#00721) from the Norwalk River. Facing north.



Image 8: Photograph of the Merritt Parkway West Rocks Road Bridge (#00722) from the Merritt Parkway. Facing west.



Image 9: Photograph of the Verneur Pratt Historic District (114-116 Perry Avenue) from Perry Avenue. Facing northeast.



Image 10: Photograph of the Glover Avenue Bridge (aka Belden Hill Avenue Bridge, Bridge #04155) from the Norwalk River. Facing south.

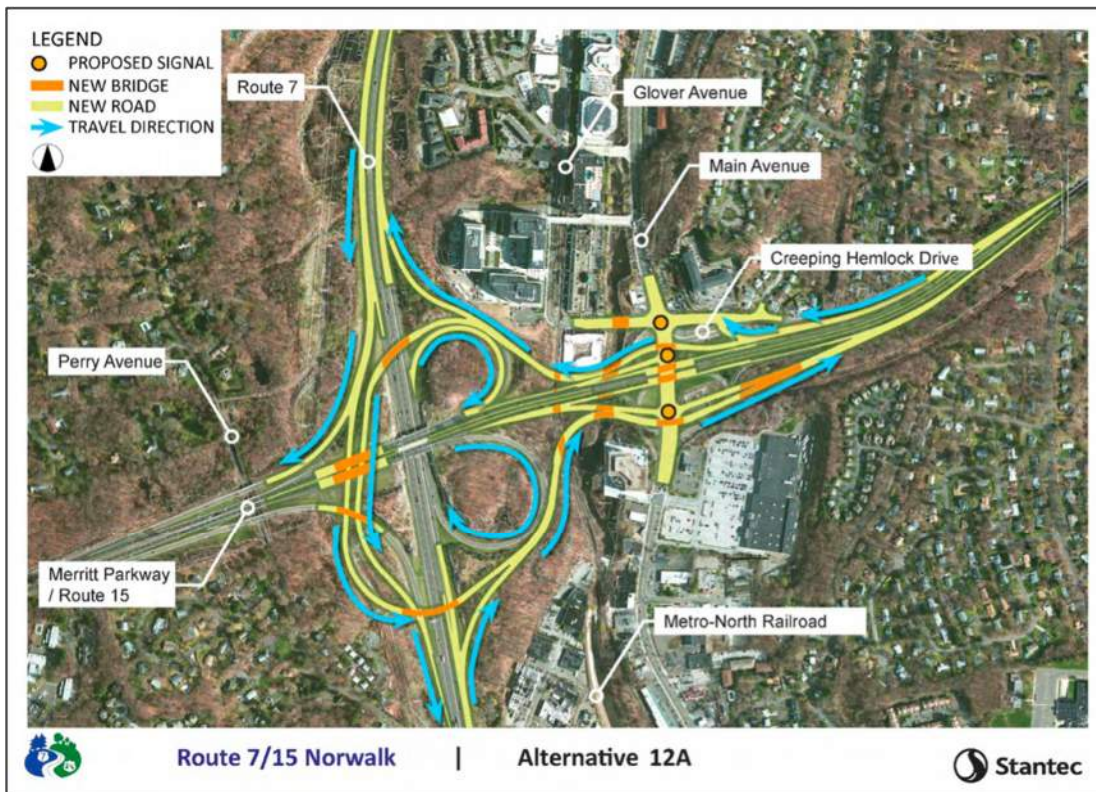


Image 11: Proposed Alternative 12A.

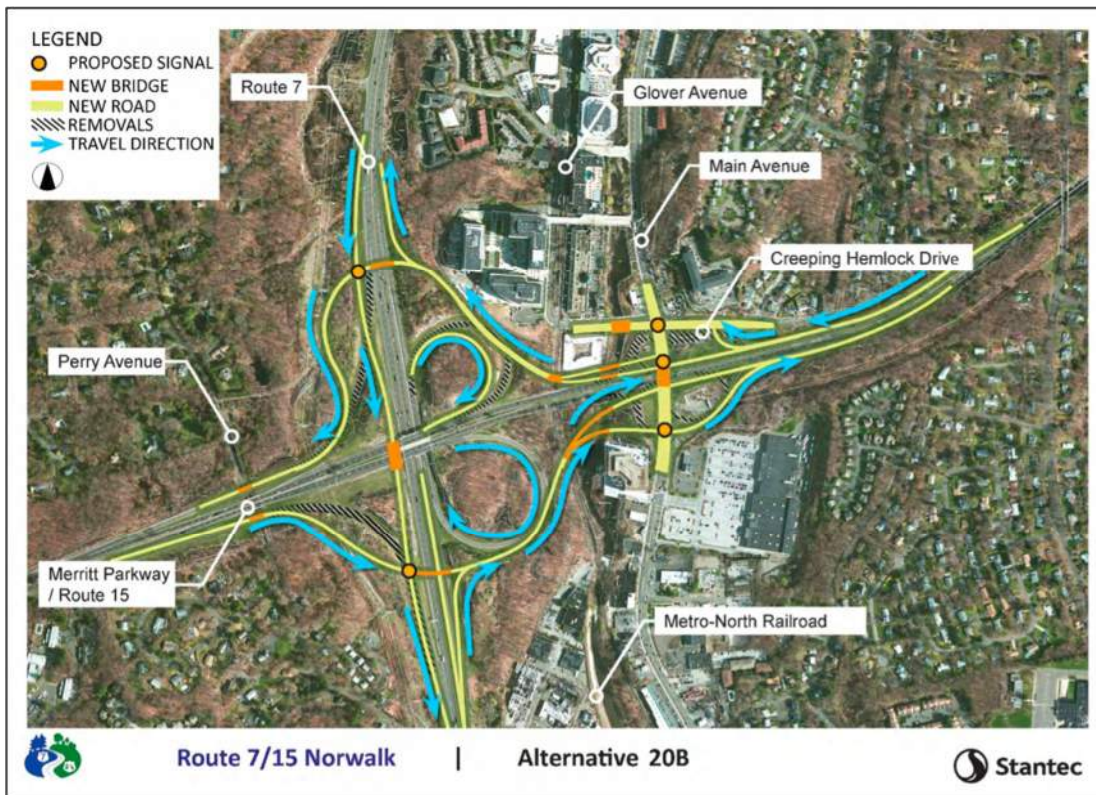


Image 12: Proposed Alternative 20B.

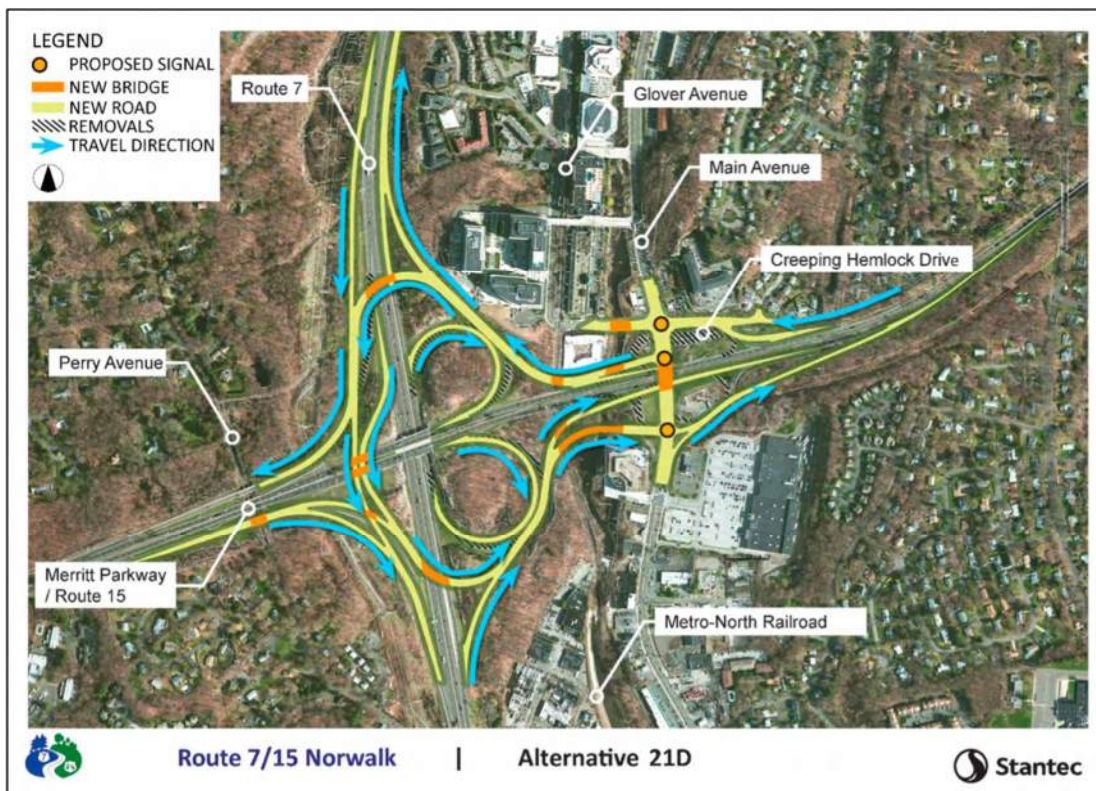


Image 13: Proposed Alternative 21D.

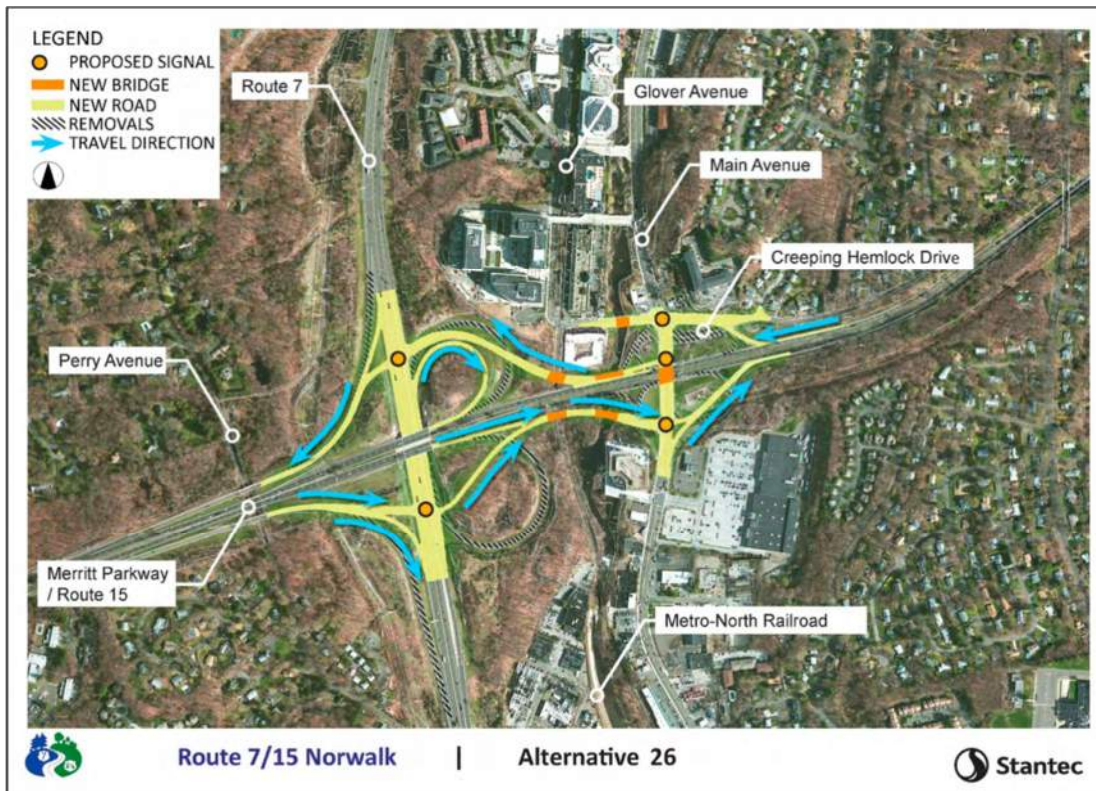
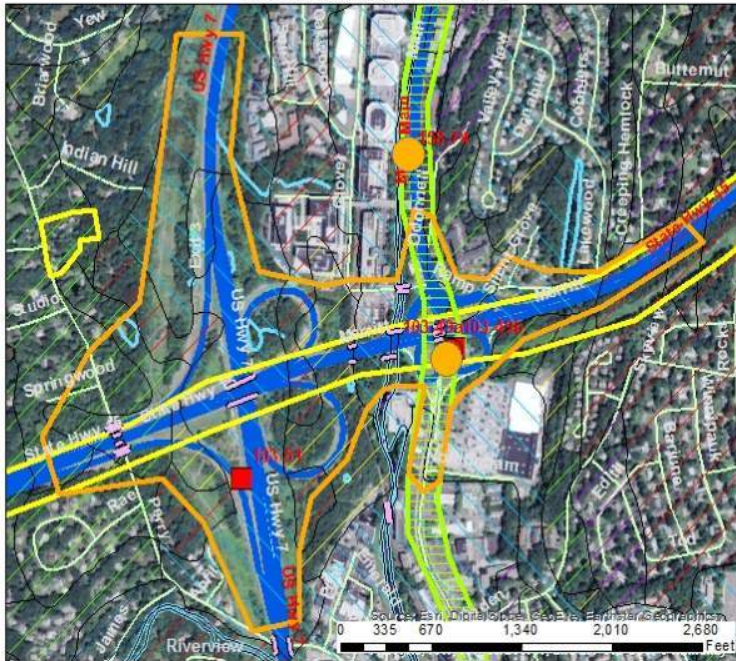
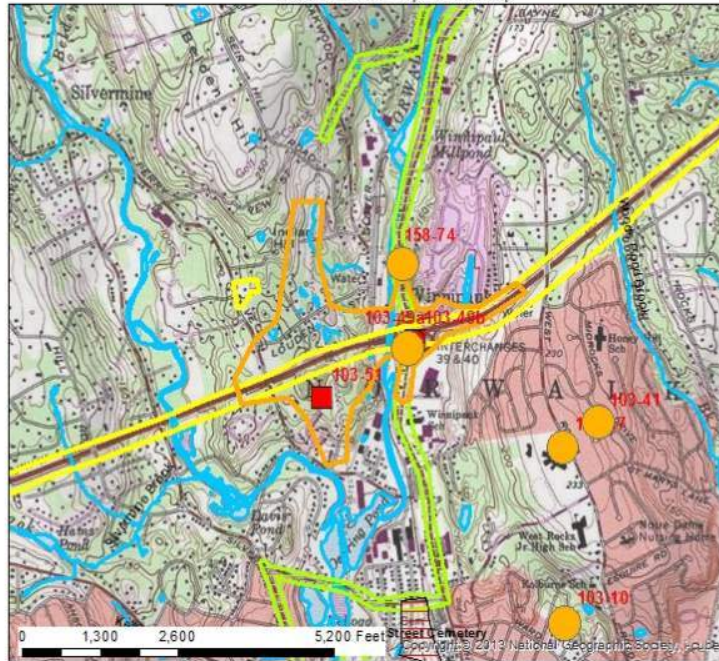


Image 14: Proposed Alternative 26.

Detail of Recent Aerial Photography



Detail of USGS Topo Quad Map



Office of Environmental Planning Environmental Review - Historical and Archaeological Resources

State Project No. 102-358
Reconstruction of
Route 7 / Route 15
Interchange
Norwalk

- Project Area
- ★ Natl Hist Landmarks
- ✱ NRHP-Listed Structures
- Historic Districts
- Cemetery
- Previous Arch Surveys

Detail of 1811 Warren Map w/ overlay of Griswold Map of Reconstructed Native Settlement circa 1625



Detail of 1856 Chace Map of Fairfield County



Approximate Location
of Archaeological Site

- Historic
- Pre-Contact
- Unknown

Predicted Archaeological
Soil Sensitivity

- | | |
|---|--|
| High | Variable |
| Moderate | Poor |
| Low | Unknown |



February 4, 2016

Appendix A

Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15
Interchange Project, State Project No. 102-358, Norwalk, Connecticut.

Appendix B

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

Appendix C - SHPO Consultation

From: McMillan, Mark J.
Sent: Wednesday, May 26, 2021 5:08 PM
To: Scofield, Jenny; Kinney, Jonathan
Subject: RE: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Thanks Jenny,

As far as timing between the two efforts, I can only hazard a ballpark estimate. The EA/EIE document is scheduled to be completed in the coming months. There are some outstanding issues created by the COVID pause in tribal consultation that is impacting both the NEPA and Section 106 process timelines. With that in mind, "by the end of 2021" is a safe estimate for EA/EIE.

While there are plans to update the MP Landscape Guide, I'm not aware of any particular deadlines or schedules for this work, so I can't have a point of comparison. "Not within 2021" is my best estimate for work on updating the Landscape Guide.

I agree that the attached guidelines are not (and were not intended) to be mitigation. I included them to provide context to those future discussions about the Merritt Parkway landscape and what character-defining features were identified through our research and consultation with the PAC subcommittee and public. Any mitigation efforts will be developed in consultation with your office and memorialized in an MOA.

Thanks again,

Mark

From: Scofield, Jenny <Jenny.Scofield@ct.gov>
Sent: Wednesday, May 26, 2021 3:32 PM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Subject: RE: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Hi Mark,

I understand that the Merritt Parkway Landscape Guide will not be updated before construction starts; my question about that at the last meeting was just to understand the timing of the two efforts.

I think it's helpful to attach the guidelines you have; we can review those as part of the EA. However I don't think the guidelines are mitigation.

Thanks,

Jenny

Jenny Fields Scofield, AICP, National Register & Architectural Survey Coordinator
State Historic Preservation Office

Department of Economic and Community Development (DECD)
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
Phone: 860-500-2343



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).

Follow us on Twitter 

Like us on Facebook 

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, May 4, 2021 11:08 AM
To: Scofield, Jenny <Jenny.Scofield@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Subject: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Good morning Jonathan, Jenny,

I'm just following up on getting all my correspondence ducks in a row. You had posed a question of whether updated Landscape Guidelines for the Merritt Parkway were anticipated to be completed before the EA/EIE (presumably FONSI) was finalized. The answer is no; the update to the 1994 Merritt Parkway Landscape Guide is still a work in progress.

However, specific to this project, a stand-alone study "Merritt Parkway Landscape Assessment Guidelines" was developed to be used both as a tool for evaluating the project's alternatives impacts under NEPA and as a means for guiding design decisions with regard to the landscaping aspect of the Merritt Parkway within the project area. The referenced Guidelines are appended in the EA/EIE document that is currently being finalized. The Guidelines identify character-defining features of the Merritt Parkway and recommend measures to be incorporated into the project design. We are proposing that CTDOT will submit final design documents to CTSHPO for your review as a potential mitigation measure under Section 106.

I wanted to confirm that this is acceptable to your office. Would you mind providing comments to this so that I can document our agencies' coordination on this matter?

Thank you,

Mark




I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner

Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
 (860) 594-2135
 (860) 594-3028 - *Fax*
 mark.mcmillan@ct.gov

From: Kinney, Jonathan
Sent: Tuesday, December 22, 2020 5:48 PM
To: Eberle, John; Elizabeth Merritt; Sarah Stokely; Scofield, Jenny; Labadia, Catherine; Holland, Emilie (FHWA)
Cc: McMillan, Mark J.; Antoniak, Yolanda M; Fesenmeyer, Andy A.; Ken Livingston
Subject: RE: 7-15 Interchange Visual Assessments

Good afternoon John. That date and time works for me. Thank you. Happy Holidays!

Jonathan Kinney
Director of Operations
Deputy State Historic Preservation Officer

Connecticut State Historic Preservation Office
Department of Economic & Community Development
State of Connecticut
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
O: 860.500.2380
Jonathan.kinney@ct.gov



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).
Follow us on:



From: Eberle, John <John.Eberle@stantec.com>
Sent: Monday, December 21, 2020 2:35 PM
To: Elizabeth Merritt <emerritt@savingplaces.org>; Sarah Stokely <sstokely@achp.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Holland, Emilie (FHWA) <emilie.holland@dot.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Cc: McMillan, Mark J. <Mark.McMillan@ct.gov>; Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Ken Livingston <klivingston@fhiplan.com>
Subject: 7-15 Interchange Visual Assessments

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello all:

As a follow-up to some recent correspondences between the various parties on this distribution, we are hoping to schedule a MS Teams meeting/session where we can review the 7-15 Interchange project with you and specifically visual elements and 3D visualization models that will give all perhaps a clearer view of the two (2) current alternatives (21D and 26) under consideration and how they might be expected to impact the Merritt Parkway.

Beyond this general review, if there are any specific agenda items anyone would like to see added, please let us know as we prepare for the meeting to assure we address.

As I don't have access to all calendars (except CTDOT), I am hoping we can try and slot a meeting in for early to mid-January. Please let me know any blackout dates not available and I'll begin herding the cats!

Right now it looks like Jan 15th , 10 AM-11:30 might be a good time. Let me know.

Happy Holidays all!

John

John F. Eberle PE, LEED AP ND
Principal

Direct: 203-495-1645 ext 7036
Fax: 203-495-1652
john.eberle@stantec.com

Stantec
55 Church Street Suite 601
New Haven CT 06510-3014



The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

From: Kinney, Jonathan
Sent: Friday, November 20, 2020 3:59 PM
To: Karmazinas, Lucas; McMillan, Mark J.
Cc: Labadia, Catherine; Scofield, Jenny
Subject: Route 15/Route7 Interchange - Norwalk Review Letter
Attachments: 106_Route 715 Interchange_Norwalk_DOT_AE_20Nov2020.pdf

Good afternoon Lucas/Mark,

Please see our attached review letter for the Route 15/Route 7 Interchange project. Feel free to reach out with any questions you may have. Thank you and have a great weekend.

Jonathan Kinney
Director of Operations
Deputy State Historic Preservation Officer

Connecticut State Historic Preservation Office
Department of Economic & Community Development
State of Connecticut
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
O: 860.500.2380
Jonathan.kinney@ct.gov



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).

Follow us on:



November 20, 2020

Mr. Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
(via email only to lucas.karmazinas@ct.gov)

Subject: Route 7 / Route 15 Interchange Project
City of Norwalk, Connecticut
State Project # 102-358

Dear Mr. Karmazinas,

The Connecticut State Historic Preservation Office (SHPO) is in receipt of your request for our comments concerning the above-referenced project and potential effects to historic properties. In addition to your September 21, 2020 letter, SHPO is also in receipt of the Public Report – Phase I and II Cultural Resources Surveys prepared for Stantec by Archaeological and Historical Services, Inc. and the accompanying Visual Impact Assessment report.

SHPO understands that the Connecticut Department of Transportation (CTDOT) plans on using a combination of state and federal funding to address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in the City of Norwalk. As a result of the use of federal funding, the project is subject to review pursuant to Section 106 of the National Historic Preservation Act. Concurrent with the Section 106 evaluation, an Environmental Assessment/Environmental Impact Evaluation (EA/EIE) document is being prepared to analyze the broader environmental impacts of the proposed undertaking in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

This office appreciates the opportunity to comment on the proposed project at this early stage of the environmental review process. During the initial alternatives assessment process, CTDOT screened 26 alternatives based on the ability for each one to meet the project's purpose and need. As a result of this screening process, CTDOT has eliminated 23 of these alternatives from further consideration. The remaining 3 alternatives being advanced are No Build, Alternative 21D, and Alternative 26.

SHPO concurs with the preliminary Area of Potential Effect (APE) defined in your letter and the submitted cultural resources survey report. Upon selection of a preferred alternative and the further progression of project design, the SHPO looks forward to additional consultation to refine the APE if necessary. As stated in your letter and the cultural resources survey report, a number of previously identified historic resources are located within the currently delineated APE:

- The Merritt Parkway Historic District was listed on the National Register of Historic Places in 1991 under Criteria A and C. In addition to the roadway and landscape features that contribute to the historic district, five contributing bridges are also located within the APE:
 - Perry Avenue Bridge (Bridge No. 00719)
 - Metro-North Railroad Bridge (Bridge No. 00720)
 - Norwalk River Bridge (Bridge No. 00721)
 - Main Avenue Bridges (Bridge No. 00530A and 00530B)
 - West Rocks Road Bridge (Bridge No. 00722)
- The Verneur Pratt Historic District, located at 114-116 Perry Avenue, was listed on the National Register of Historic Places in 2011.
- The Glover Avenue Bridge (Bridge No. 04155) was determined eligible for the National Register of Historic Places by the SHPO in 1991.
- Connecticut Archaeological Site 103-57 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.
- Connecticut Archaeological Site 103-58/60 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.
- Connecticut Archaeological Site 103-61/62 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.

CTDOT also has identified several properties within the APE as potentially eligible for listing on the National Register of Historic Places:

- 2 Singing Woods Road
- 129 Perry Avenue
- Metro-North Norwalk River bridge (Bridge No. 8202R)

As the project design evolves and a preferred alternative is selected, additional information about these resources may be required in order to conduct a formal eligibility evaluation as part of the ongoing consultative process.

Should CTDOT proceed with either build alternative as currently designed, Alternative 21D or Alternative 26, the undertaking will constitute an adverse effect upon historic properties. Both build alternatives will result in the demolition and replacement of historic bridges and alterations to the Merritt Parkway that will diminish the district's integrity as well as other potential impacts to historic resources within the APE. SHPO looks forward to continuing consultation with CTDOT and the additional consulting parties to avoid, minimize, or mitigate the effects of the proposed undertaking as it progresses.

This office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the National Environmental Policy Act, the Connecticut Environmental Policy Act, and Section 106 of the National Historic Preservation Act, as amended. For additional information, please contact Jonathan Kinney at (860) 500-2380 or Jonathan.kinney@ct.gov.

Sincerely,

A handwritten signature in blue ink, reading "Jonathan Kinney". The signature is fluid and cursive, with the first name "Jonathan" being more prominent than the last name "Kinney".

Jonathan Kinney
Deputy State Historic Preservation Officer

Cc: Mark McMillan – CTDOT (*via email only to* mark.mcmillan@ct.gov)

From: McMillan, Mark J.
Sent: Monday, September 21, 2020 4:32 PM
To: McMillan, Mark J.
Subject: PLEASE REVIEW: §106 Evaluation of Route 7/15 Interchange Project (State Project #102-358), Norwalk
Attachments: §106-RECOMMENDATION-LETTER_Norwalk_102-358_20200921.pdf; §106-APPENDIX-B_Norwalk_102-358_20200921.pdf

Good morning,

Attached is an evaluation letter of the alternatives under for State Project #102-358, which proposes to reconstruct the Route 7 / Route 15 interchange in Norwalk. The letter considers the impacts that each alternative will have to historic properties and provides recommendations of effect in accordance with the National Historic Preservation Act.

As a Consulting Party to the Section 106 review process, please review this evaluation. If you or your organization has comments or input regarding the evaluation or its recommendations of effect, please provide them within the next 30 days. The comment period will conclude on Friday, October 23, 2020. The information you and the other Consulting Parties provide will help ensure that the impacts to historic properties are fully considered and will inform the process of identifying a preferred alternative of action.

Due to its large size, Appendix A – the Phase I and II Cultural Resources Report can be accessed using this link:

FTP link: <https://tmppsftp.stantec.com>

Login name: s1001080133

Password: 3386884

Disk Quota: 2GB

NEW Expiry Date: 10/15/2020

Appendix B is attached in this email.




For additional information regarding the Route 7 / Route 15 Interchange Project, you can visit the project website: www.7-15norwalk.com.

If you have any questions or require further information regarding this document, contact Mark McMillan at mark.mcmillan@ct.gov.

Mark

I am currently teleworking out of the office but am available via email.
If this is an urgent matter, please email me your telephone number and I will contact you.
Stay well!

Mark McMillan
Supervising Transportation Planner

Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
 (860) 594-2135
 (860) 594-3028 - *Fax*
 mark.mcmillan@ct.gov



STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546



Transmittal:

From: Lucas A. Karmazinas
Date: September 21, 2020
Through: Robert Bell, Director, CTDOT Bureau of Policy & Planning
To: Jonathan Kinney, Deputy State Historic Preservation Officer

Project: State No.: 102-358
F.A.P. No.: 0015(133)
Project Title: Route 7/Route 15 Interchange Project
Town: Norwalk

Subject: SHPO Consultation Documentation

Description of Activity

The Connecticut Department of Transportation (CTDOT) is currently evaluating a project that will address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in Norwalk. The Merritt Parkway was developed as Connecticut's first divided-lane, limited access highway between 1934 and 1942 and it extends 37.5 miles from the New York border in the west to Stratford in the east. The Merritt Parkway was listed in the National Register of Historic Places as a historic district in 1991 and is significant at the national level under Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (embodying the distinctive characteristics of a type, period or method of construction, or possessing high artistic values).¹

The Merritt Parkway's interchange with Main Avenue (Interchange No. 40) was included as part of the parkway's original design, however, the interchange with Route 7 (Interchange No. 39) was not constructed until 1990. This being said, Interchange No. 39 provides only partial connections between the two highways and, as a result, linkages to and from the north are not provided. On the other hand, connections in all directions are presently available at Interchange No. 40, which is located approximately 1500' east of Interchange No. 39 (Image 1). The proposed State Project #102-358 seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40.

¹ National Park Service, *Merritt Parkway* (NPS #91000410), listed April 17, 1991.

Because the proposed project anticipates the use of both federal and state funding, it falls under the purview of the National Historic Preservation Act (NHPA). “Section 106” is the clause of the NHPA that mandates federal agencies to consider the effects of an undertaking on historic properties. The process is codified in 36 CFR 800.1-16, and is often referred to colloquially as “Section 106”.

Concurrent with the Section 106 evaluation, an Environmental Assessment / Environmental Impact Evaluation (EA/EIE) document is being prepared for State Project #102-358 in an effort to analyze the broader environmental impacts of proposed project alternatives in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

The EA/EIE will evaluate the impacts of the project on the man-made, social, and natural environments and will recommend the preferred alternative of action. It is currently considering three alternatives that consist of a “No Build/No Action” option and two “build” alternatives that will entail construction actions. This document will evaluate the build alternatives impacts specifically as they impact historic properties (above- and below-ground) in accordance with the provisions of Section 106 of the National Historic Preservation Act. The information provided by this review process will complement other analyses that are being conducted under NEPA/CEPA.

Each of the alternatives have been developed in association with a public stakeholder group and were presented at a public meeting conducted in 2017. CTDOT invited representatives from the Merritt Parkway Conservancy, a Project Advisory Committee, and the public to participate in the PAC meetings, and to provide input on both historic/cultural considerations as well as the environmental impacts as a whole.

Technical Review of Project

The Merritt Parkway is a divided-lane, limited access highway with two primary travel lanes in each direction (northbound and southbound). It was constructed by the State of Connecticut between 1934 and 1942 and travels on a roughly southwest to northeast course over its 37.5-mile traverse between the New York State border and Stratford, respectively. Conceived as both a high-speed transportation corridor and naturalistic landscape, the Merritt maintains a 300'-wide right-of-way (ROW) throughout its length, this providing for carefully designed sweeping curves, long-framed vistas, and a wide median and shoulders initially planted with tens-of-thousands of native trees, shrubs, and other flora.

The Merritt Parkway is also notable for its prominent over- and underpasses, of which 36 of each were originally constructed. The bridges were designed by George L. Dunkelberger, Senior Draftsman and, after 1941, the Connecticut Highway Department's Highway Architect. They feature a mix of Art Deco, Moderne, and historical revival styles, and employed cast, colored, and sgraffitto concrete and detailed ironwork. Architecturally significant works of art in their own right, the Merritt's bridges both accentuate the visual character of the parkway and blend into its naturalistic landscape.

The aforementioned developmental background and design details resulted in a historically and architecturally significant resource that justified the Merritt Parkway's inclusion on the National Register of Historic Places under Criteria A and C in 1991. Its areas of significance include Transportation (as a largely intact example of a 20th-century parkway), Architecture (for its historic bridges and rest areas), and Landscape Architecture (as a significant work of naturalistic landscape architecture). This being said, a Public Report summarizing Phase I and II Cultural Resources Surveys prepared as part of State Project #102-358 (Public Report) notes that the parkway has undergone a litany of changes since its opening in 1942.² These include "added lanes, inconsistent signage and guiderail treatments, reduction of the median, development proximity to the right-of-way, and inappropriate, lost, or overgrown plantings."³ The alterations, the report notes, however, have not compromised the overall historic character and integrity of the Merritt Parkway or, more specifically, the portion of the parkway to be potentially impacted by State Project #102-358.

As noted, the proposed undertaking seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40. At present, Interchange No. 39 provides connections only from:

- Route 7 northbound to the Merritt Parkway southbound.
- Route 7 southbound to the Merritt Parkway southbound.
- Merritt Parkway northbound to Route 7 northbound.
- Merritt Parkway northbound to Route 7 southbound.

As a result:

- Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road.
- Merritt Parkway northbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue.
- Route 7 motorists have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

On the other hand, full connections are provided between the Merritt Parkway and Main Avenue at Interchange No. 40, which would allow for use of, or integration with, aspects of this feature in implementing full connectivity between the Merritt Parkway and Route 7. A full outline of the proposed alternatives and their potential impacts on historic resources is described below in "Alternatives Under Consideration."

² Archaeological and Historical Services, Inc., *Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut*, prepared for Stantec, December 13, 2018, Updated May 15, 2020 (See Appendix A).

³ Archaeological and Historical Services, Inc., p. i.

The need to improve Interchange No. 39 became apparent not long after its initial completion. A new alternative that provided connections in all directions between the Merritt Parkway and Route 7 was designed and approved in the late 1990s, with initial construction taking place in 2005. This work was halted in 2006, however, after the Federal Highway Administration (FHWA) was successfully sued under Section 4f of the U.S. Department of Transportation Act of 1966 due to the implications of the project. Public consensus on a new design alternative was reached in 2009, yet a lack of funding prevented the project from moving forward at that time. Public coordination and further modifications to the design under the present project were initiated after federal and state funds were secured in 2016.

Project Site and Area of Potential Effects (APE)

The APE is the geographical space in which an undertaking may create changes to a historic property's character or use. According to Section 106 regulation 800.5, "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."⁴ As State Project #102-358 is currently in its preliminary design phase, the Project Site for the purposes of this review and the Phase I and II Cultural Resources Surveys consists of the greatest possible footprint of construction activities (direct effects) for all four design alternatives presently under consideration (Image 2), while the Area of Potential Effects (APE) consists of the greatest possible extent of direct and indirect effects, the latter including visual, noise, vibration, air quality, and traffic effects resultant of the proposed work (Image 3). It was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys, however, that indirect effects on air quality, noise, traffic, and vibration resultant of all of the design alternatives would be negligible.⁵ Each of the alternatives would provide improvements in the existing conditions such as air quality and traffic congestion when compared to the "no build" alternative of not taking action.

The Public Report outlines the methodology used to define the project's APE and to identify historic resources that might be potentially impacted by the project. Subsequent evaluation of project's construction (direct) and visual (indirect) effects revealed the presence of six additional Historic Properties within the APE that may be affected by the proposed project. These properties are:

Merritt Parkway Historic District

Connecticut's first divided-lane, limited access highway, alternately identified as Route 15. Built between 1934 and 1942, it extends 37.5 miles from the New York State border to Stratford.

⁴ Archaeological and Historical Services, Inc., p. 4.

⁵ Archaeological and Historical Services, Inc., p. 5.

It was listed in the National Register of Historic places in 1991 under Criteria A and C and retains its overall historic character and integrity despite various alterations over the almost 80 years since its completion.

The portion of the Merritt Parkway located within the APE extends 1.5 mile and includes five historic bridges that contribute to the Merritt Parkway Historic District. From west to east they consist of the:

- Perry Avenue Bridge (#00719) – Single-span, rigid-frame concrete bridge with arched opening built in 1936 to carry the Merritt Parkway over Perry Avenue (Image 4). It bears stylistic influences of the Art Moderne and Modern Classicism and features a concrete balustrade with a bas-relief cartouche of the Connecticut State Seal on the interior face of the northeast pylon. The bridge retains its historic character and physical integrity, however, the visual setting has been heavily impacted by the construction of flanking concrete and steel girder bridges erected as part of the Route 7 and 15 interchange project in 1990.
- Metro-North Railroad Bridge (#00720)(aka Winnipaug Railroad Bridge) – Single-span, rigid-frame, reinforced concrete bridge with arched opening built in 1937 to carry the Merritt Parkway over the Metro-North Railroad (Image 5). Utilitarian design with plain concrete abutments and wingwalls. Retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- Main Avenue Bridges (#00530A & #00530B) – Twin single-span, rigid-frame concrete bridges with arched openings and random rubble facing built in 1937 to carry the Merritt Parkway over Main Avenue (Image 6). Designed in a mixed Classical Revival and Rustic style with granite voussoirs, quoins, and coping. The northern parapet and northeast wingwall of Bridge #00530B (the northern span) were replaced in kind in 2015 and 2016, however, the bridges retain their historic character and physical integrity despite the rehabilitation and other changes to their visual setting resultant of commercial development to the north and south.
- Norwalk River Bridge (#00721) – Three-span, reinforced concrete arch bridge built in 1938 to carry the Merritt Parkway over the Norwalk River (Image 7). Utilitarian design with wide raised bands in each arch and the parapets. While the bridge was rehabilitated in 1988, it retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- West Rocks Road Bridge (#00722) – Single-span, steel, rigid-frame bridge with segmental-arch opening built to carry West Rocks Road over the Merritt Parkway in 1937 (Image 8). Designed in a mixed Moderne and Neoclassical style with ornamental metal railings and crenellated parapet. The bridge's rehabilitation in 2018 was determined to result in No Adverse Effect and, as such, the bridge retains its historic character and physical integrity.

The Public Report notes that the portion of the Merritt Parkway located within the APE has experienced numerous changes to its structures, landscape, and setting, yet it retains its overall historic character. The report reads,

The western portion of the Parkway within the APE today mostly resembles a modern interstate highway rather than a scenic parkway. It features typical modern entrances, exits, and signage and lacks historic elements found throughout the rest of the Parkway, such as a wide landscaped median. The easternmost portion of the APE, east of the Main Avenue interchange, retains more of the Parkway's historic character, derived from the planted median strip, narrow verges, and close-to-the-road landscaping. At a closer level of detail, however, exceptions can be found within these generalizations. For example, in the more highly altered western portion of the APE, there is a typical Parkway rock cut close to the roadway, at the southbound on-ramp from Route 7 North, and there is a small group of trees in the median as the roadway ascends toward the Perry Avenue undergrade bridge that is not unlike the original Parkway treatment. The overall geometry of the eastern portion of the APE is more intact, but details such as modern signage, condition of the vegetation, and modern guiderails reduce the experience of the original Parkway concept. Long views in the eastern portion reveal the dense modern commercial, office, and residential development that surrounds this portion of the Parkway.⁶

The aforementioned conditions are more comprehensively laid out in the Public Report and are based upon evaluation of eight critical components of the parkway's original design. They include roadway width, median and verges, alignment, vegetation, bridges, signage, guiderails, and views. The relevant evaluation can be found on pages 32-34.

Verneur Pratt Historic District

The Verneur Pratt Historic District is located at 144-116 Pratt Avenue and was listed on the National Register of Historic Places in 2011 (Image 9).⁷ It is comprised of a Georgian-style residence built ca. 1788 and a ca. 1800 barn associated with scientist Verneur E. Pratt, who purchased the property during the early 20th century. The historic district is located approximately 0.25-mile north of the Pratt Avenue bridge and retains its historic character and physical integrity.

Glover Avenue Bridge (#04155)

The Glover Avenue Bridge (aka Belden Hill Avenue Bridge) is a two-span, stone-arch bridge built by the City of Norwalk to carry Glover Avenue (originally Belden Hill Avenue) over the Norwalk River in 1912 (Image 10). The bridge is constructed of rubble fieldstone and is accented with brownstone voussoirs and coping.

⁶ Archaeological and Historical Services, Inc., p. 30.

⁷ National Park Service, *Verneur Pratt Historic District (NPS #11000434)*, listed July 19, 2011.

It was determined eligible for the National Register of Historic Places by CTSHPPO following documentation as part of the statewide bridge inventory completed in 1991 and was the subject of State-Level Documentation prepared under a previous iteration of State Project #102-358 in 2000.⁸ The bridge retains its historic character and physical integrity.

Archaeological Site 103-57

Archaeological Site 103-57 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D (Information Potential) as part of Phase II testing.⁹ It consists of a Middle/Late Archaic, or possibly Woodland-Age, site located within the Project Site.

Archaeological Site 103-58/60

Archaeological Site 103-58/60 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹⁰ It consists of a combined Late Archaic/Pre-Colonial site located within the Project Site.

Archaeological Site 103-61/62

Archaeological Site 103-61/62 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹¹ It consists of a combined Pre-Colonial/Middle Archaic site located within the Project Site.

Coordination and Consulting Parties

As noted, litigation halted a previous attempt to redesign the Merritt Parkway/Route 7 interchange in 2006. Subsequently, a public stakeholder group was organized, which, along with representatives from the Merritt Parkway Conservancy, public agencies, and other interested parties, would evaluate and vet possible design alternatives. Consensus on such a design, Alternative 21C, was reached following a public meeting in 2009, yet a lack of funding prevented the project from going to construction.

⁸ Bruce Clouette and Matthew Roth, *Connecticut Historic Bridge Survey; Inventory-Phase Final Report: Project Narrative, Inventory and Recommendations*, submitted to the Connecticut Department of Transportation Office of Environmental Planning, December 1990; Bruce Clouette, *Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut*, prepared April 2000 (See Appendix B).

⁹ Archaeological and Historical Services, Inc., p. 15.

¹⁰ Archaeological and Historical Services, Inc., p. 15.

¹¹ Archaeological and Historical Services, Inc., p. 15.

Federal and state funds for continued design efforts were secured in 2016, however, at which time a series of new alternatives were designed and presented for assessment by the consulting parties (including federally-recognized tribes, the Merritt Parkway Conservancy, the Project Advisory Committee, public agencies, and the public). The preferred options were presented via a project website launched in the fall of 2017, and a public scoping meeting held on October 17, 2017. The results of the scoping process can be found in a summary report prepared by FHWA and CTDOT, although the vetting of the preferred option(s) is ongoing.¹²

Alternatives Under Consideration and Potential Impacts on Historic Properties

The purpose of State Project #102-358 is to address the existing deficiencies of the Merritt Parkway's Interchange No. 39. The goal of the project is to provide for access in all directions between the Merritt Parkway and Route 7 and, as a result, improve operations and reduce congestion on Main Avenue, which currently supplements the lack of connectivity at Interchange No. 39. Two alternatives are currently being evaluated as part of the development of the EA/EIE document. Each of the alternatives will be briefly described here and evaluated with regard to their impacts specifically to historic properties. Adverse effects are the result of an undertaking altering the qualities that make a property "historic". An adverse effect will diminish one of more of the aspects of an historic property's integrity, thereby weakening the property's ability to demonstrate a connection to the past.

More detailed descriptions of the alternatives can be found in the Public Report. It should be noted that four design alternatives are described here. The Public Report was developed to provide information regarding the historic and cultural resources within the project APE. When the Public Report was initiated, four alternatives were under consideration. During the NEPA/CEPA analysis process and in conjunction with input from the Project Advisory Committee, two of the alternatives (12A and 20B) have since been removed from consideration. A brief description of them is included in this letter so that it is consistent with the Public Report.

Alternative 12A

Alternative 12A would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 11). The reconfiguration would involve elimination of the existing loop ramps at Interchange No. 40, construction of four new modified diamond interchange ramps, construction of roughly 20 new or replacement bridges, and construction of new Merritt Parkway and Route 7 on- and off-ramps. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

¹² Federal Highway Administration and Connecticut Department of Transportation, *Scoping Report: Route 7/15 Interchange Project, Norwalk, Connecticut*, prepared January 2019.

Impacts on Historic Properties resultant of Alternative 12A include demolition of both Main Avenue Bridges (#00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It would also introduce elevated ramps that, along with other changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting, could result in a loss of integrity in terms of material, design, feeling, and association. The construction of ramps that were elevated above the Merritt Parkway was found to be a critical flaw in this alternative and consequently, Alternative 12A was removed from further evaluation.

Alternative 20B

Alternative 20B would provide for the four lacking connections at Interchange No. 39 by eliminating the two direct ramps in the western quadrants of Interchange No. 39 and establishing new semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 and construction of a system of signal-controlled intersections and ramps (Image 12). The reconfiguration would involve replacement of three of the Interchange No. 39 ramps, all the existing Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 20B include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association, although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. Archaeological Sites 103-57 and 103-58/60 would not be affected by Alternative 20B.

Each alternative was evaluated on its capacity to meet the purpose and need as well as the desirable outcomes of the project. Since the Public Report study commenced, it was determined that Alternative 20B did not sufficiently meet the desirable outcomes of the project. It was removed from further consideration.

Alternative 21D

Alternative 21D would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 13). The reconfiguration would involve elimination of three of the Interchange No. 39 ramps and all of the Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 21D would include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. None of the National Register-eligible archaeological sites located in the Project Site will be affected by Alternative 21D.

Alternative 26

Alternative 26 would provide for the four lacking connections at Interchange No. 39 by introducing signalized intersections on Route 7 and establishing semi-direct connections with Interchange No. 40 through the reconfiguration of both Interchanges No. 39 and No. 40 (Image 14). The reconfiguration would involve elimination of all of the existing ramps at both interchanges, construction of new modified diamond interchange ramps in all but the heavily-traveled Route 7 northbound to Merritt Parkway westbound movement, which will require a loop ramp, and construction of roughly six new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 26 include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B), and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association. Unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. The ramps required by Alternative 26, however, would be shorter than those employed by the other alternatives, thus resulting in a lesser overall effect on the designed landscape. Alternative 26 will directly impact Archaeological Sites 103-57 and 103-58/60, yet would not result in effects to Site 103-61/62.

Recommendation

State Project #102-358 is the subject of both an Environmental Assessment under NEPA and a Section 106 review under the National Historic Preservation Act. At this time, a preferred alternative has not yet been identified from among the four under consideration. Construction of any of the design alternatives will create indirect impacts on the area in regard to air quality, noise, traffic, and vibration, however, it was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys that these effects would be negligible. In accordance with Section 106 of the National Historic Preservation Act, CTDOT offers the following recommendations of effect on historic properties caused by each of the alternatives relative to direct or visual (indirect) effects:

Alternative 21D

Alternative 21D will change the historic integrity of the Merritt Parkway and the Glover Avenue Bridge, yet will not affect any of the NR-eligible archaeological sites located within the project area. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 21D will be at or below the level of the Merritt Parkway. Regardless, this design will still constitute an *adverse effect to historic properties*.

Alternative 26

Alternative 26 will change the historic integrity of the Merritt Parkway, the Glover Avenue Bridge, and Archaeological Sites 103-57 and 103-58/60. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 26 will be at or below the level of the Merritt Parkway and all of the new ramps will be shorter than those required by the other alternatives. Regardless, this design will still constitute an *adverse effect to historic properties*.



Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation

Attached Documents:

☒ **Historic Review Map**

☒ **Supporting Documents**

- Appendix A – Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut.
- Appendix B - Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

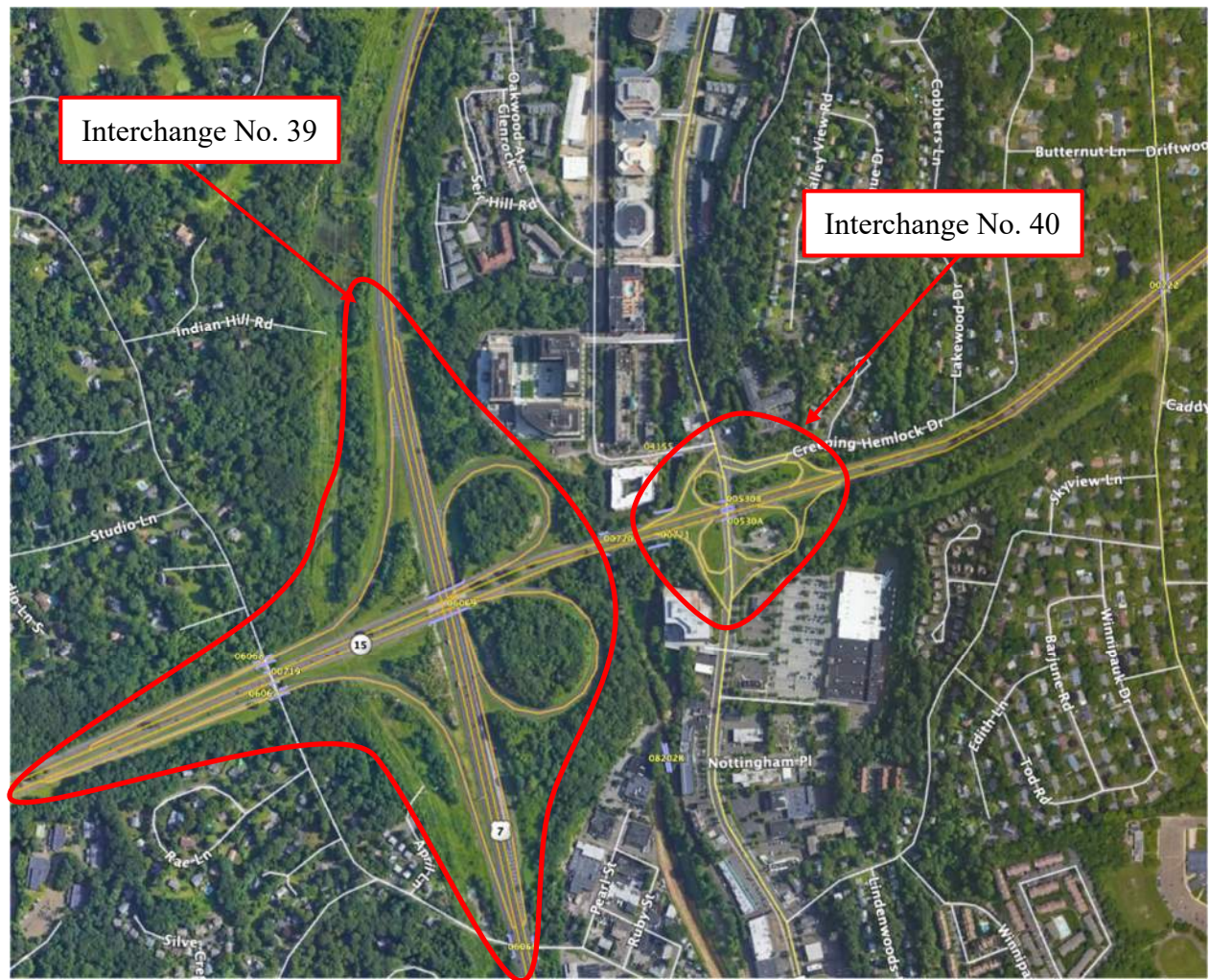


Image 1: Google Earth aerial image (2020) showing the Route 15 (Merritt Parkway) interchanges with Route 7 (Interchange No. 39) and Main Avenue (Interchange No. 40) in Norwalk.

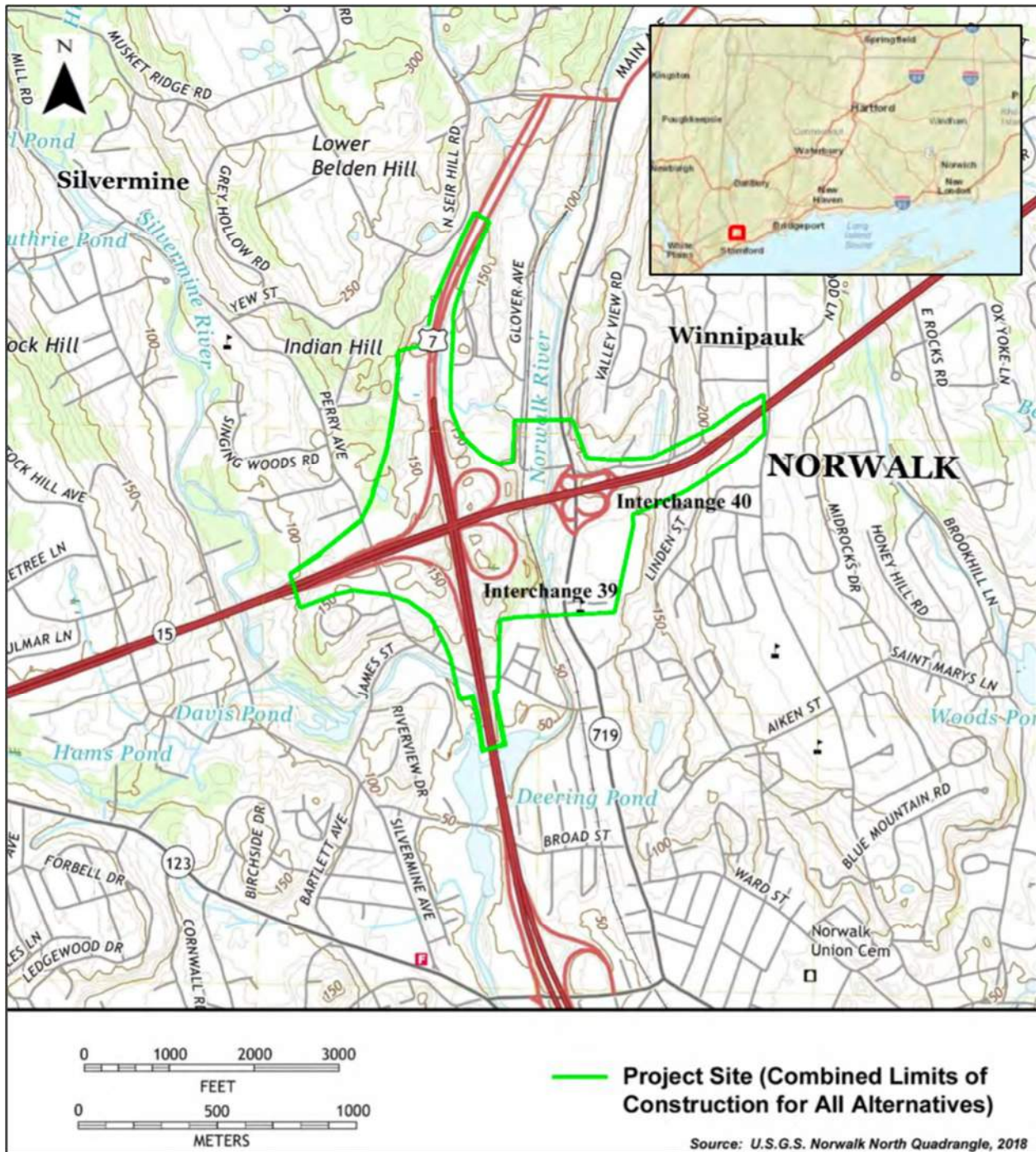


Image 2: Image showing the Project Site, which has been identified as the maximum combined limits of construction activities (direct effects) for all design alternatives.

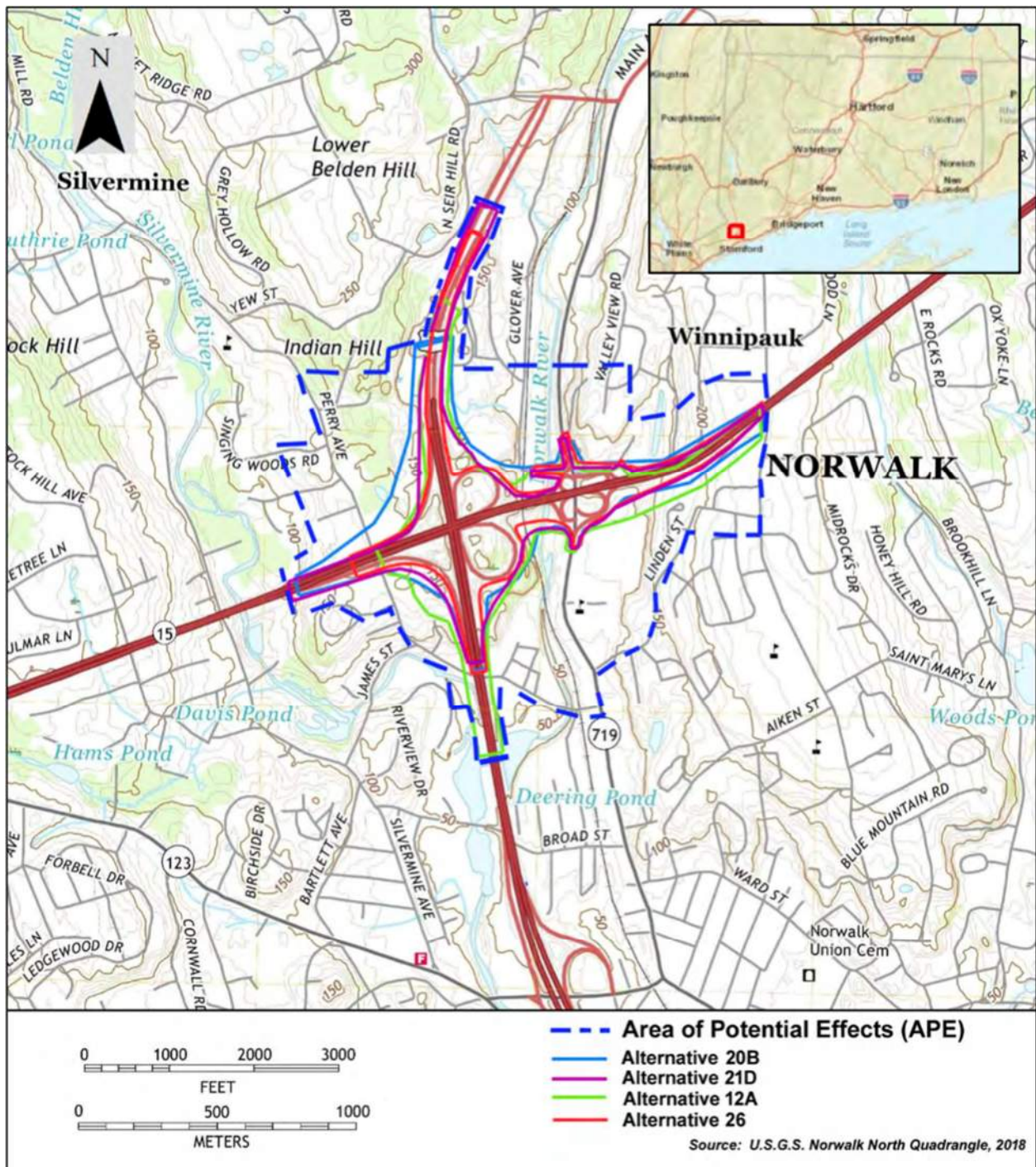


Image 3: Image showing the Area of Potential Effects (APE), which has been identified as the maximum combined limits of direct and indirect effects for all design alternatives.



Image 4: Photograph of the Merritt Parkway Perry Avenue Bridge (#00719) from Perry Avenue. Facing south.



Image 5: Photograph of the Merritt Parkway Metro-North Railroad Bridge (#00720) from the Metro-North Railroad. Facing north.



Image 6: Photograph of the Merritt Parkway Main Avenue Bridges (#00530A & #00530B) from Main Avenue. Facing north.



Image 7: Photograph of the Merritt Parkway Norwalk River Bridge (#00721) from the Norwalk River. Facing north.



Image 8: Photograph of the Merritt Parkway West Rocks Road Bridge (#00722) from the Merritt Parkway. Facing west.



Image 9: Photograph of the Verneur Pratt Historic District (114-116 Perry Avenue) from Perry Avenue. Facing northeast.



Image 10: Photograph of the Glover Avenue Bridge (aka Belden Hill Avenue Bridge, Bridge #04155) from the Norwalk River. Facing south.

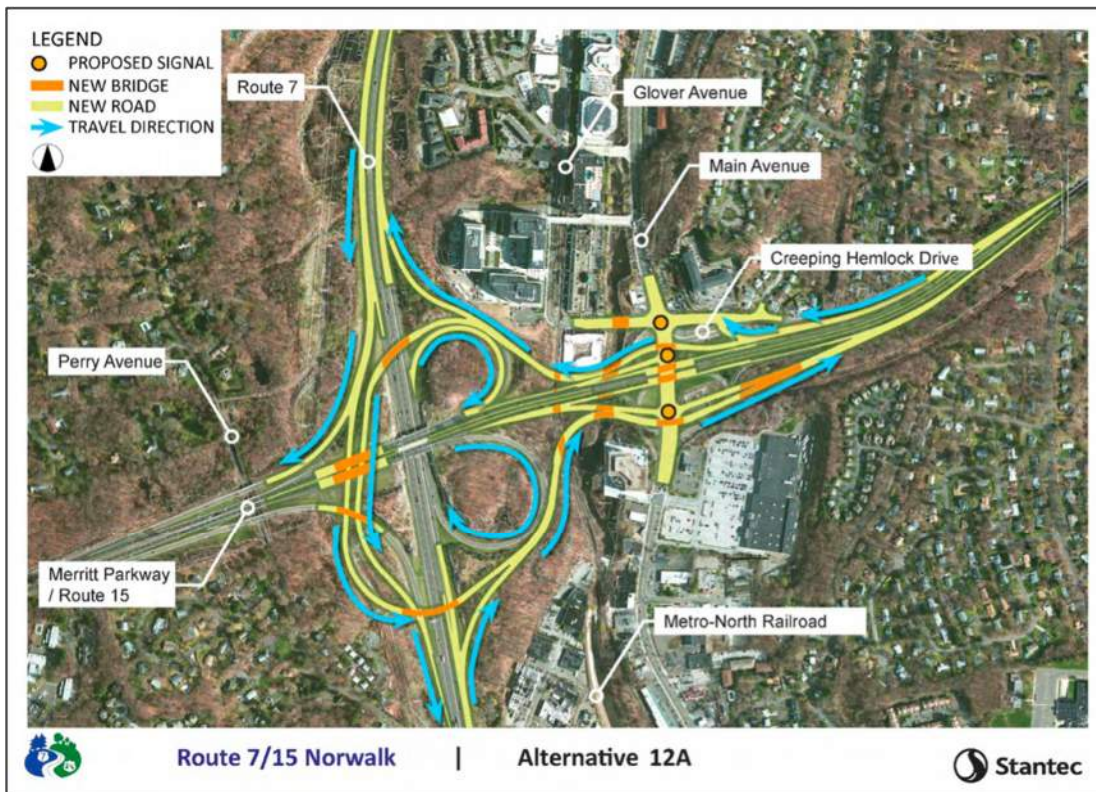


Image 11: Proposed Alternative 12A.

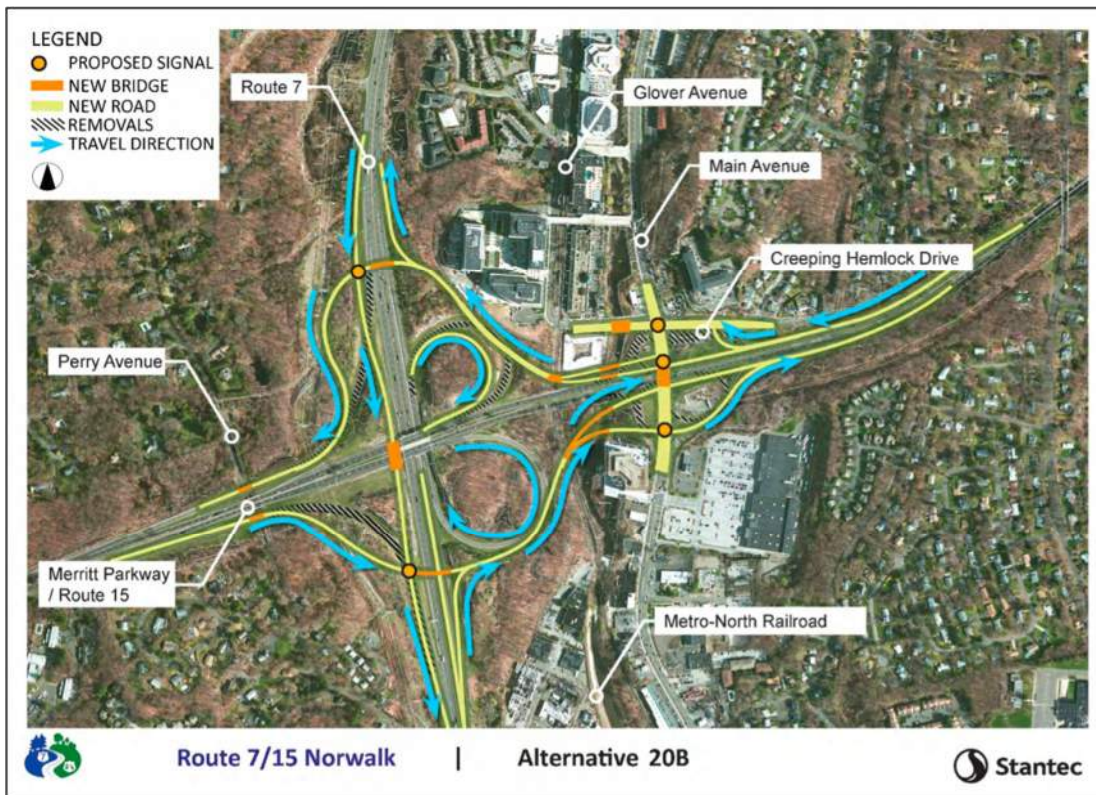


Image 12: Proposed Alternative 20B.

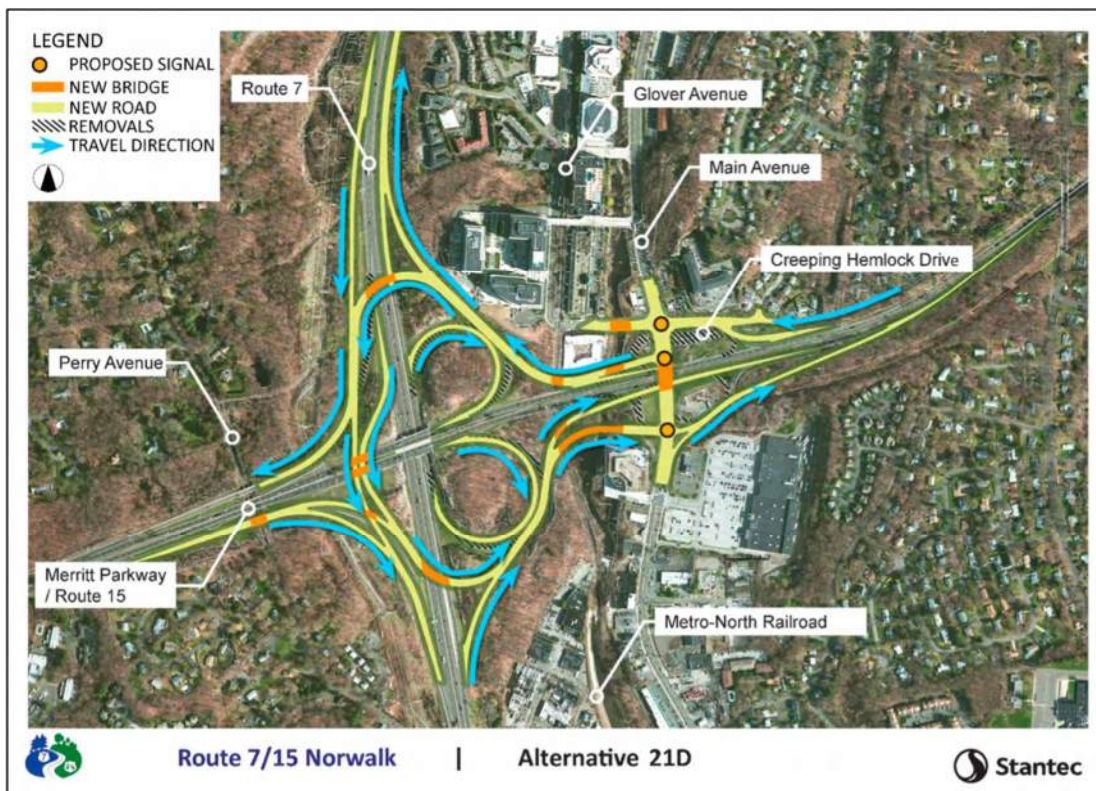


Image 13: Proposed Alternative 21D.

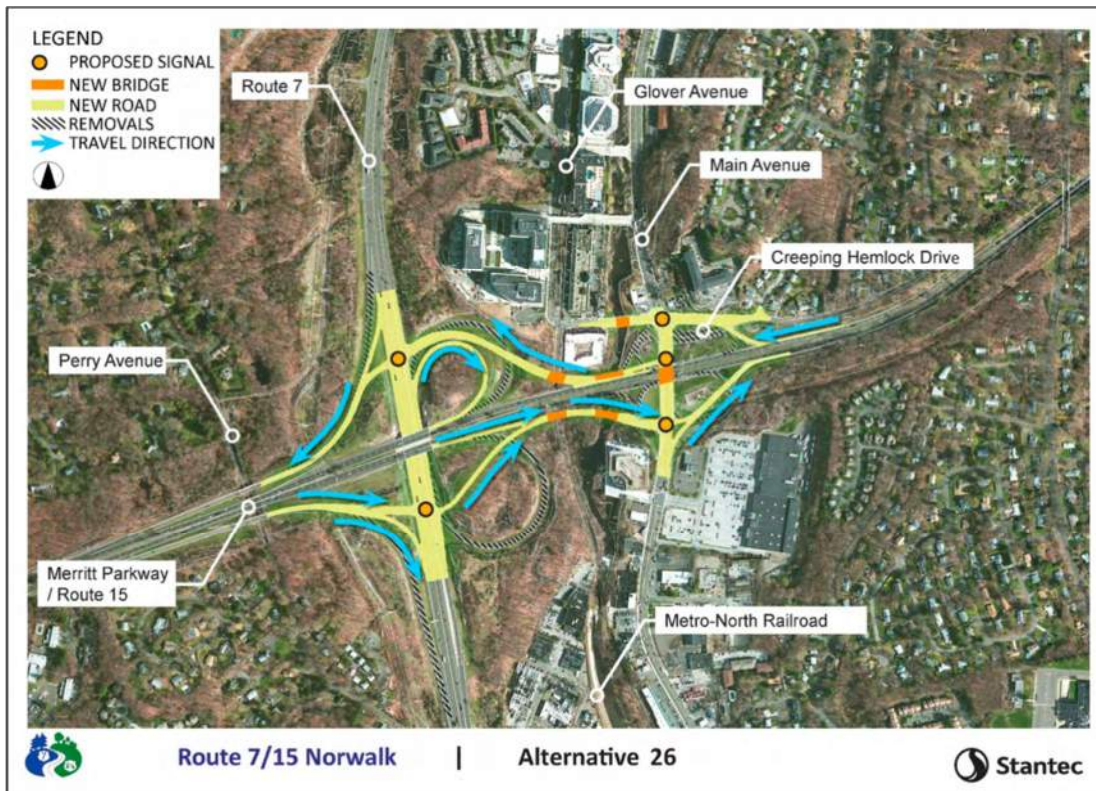
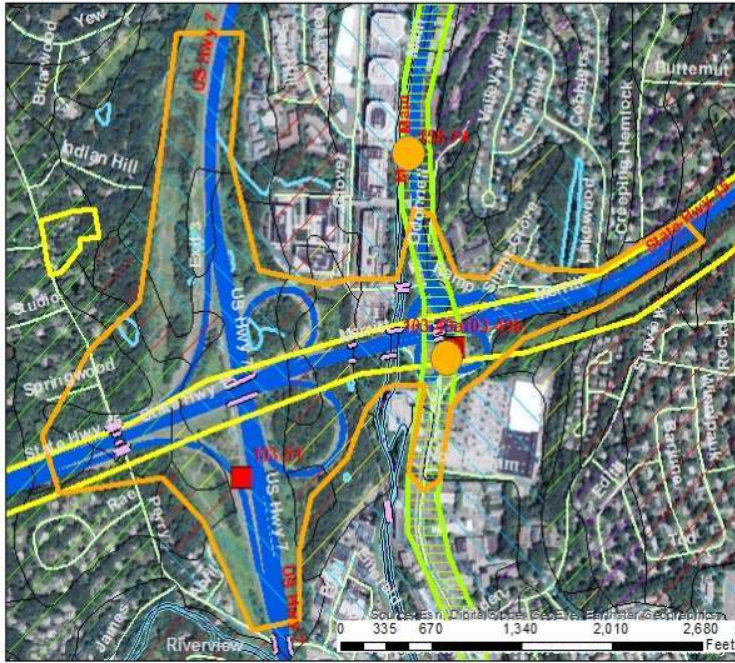
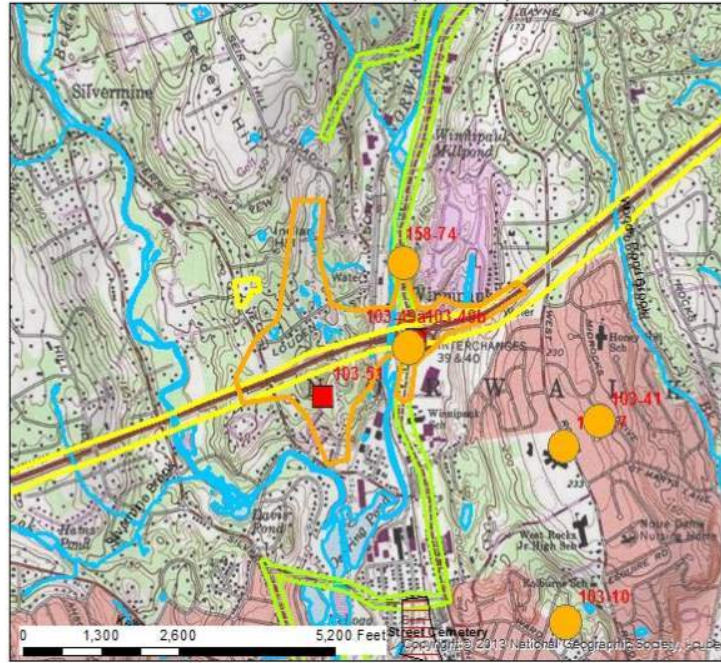


Image 14: Proposed Alternative 26.

Detail of Recent Aerial Photography



Detail of USGS Topo Quad Map

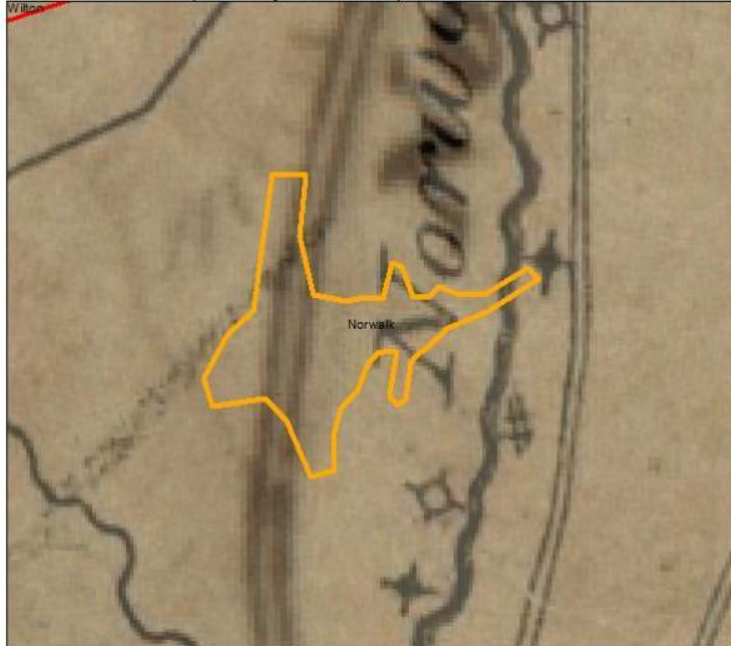


Office of Environmental Planning Environmental Review - Historical and Archaeological Resources

State Project No. 102-358
Reconstruction of
Route 7 / Route 15
Interchange
Norwalk

- Project Area
- ★ Natl Hist Landmarks
- ✱ NRHP-Listed Structures
- Historic Districts
- Cemetery
- Previous Arch Surveys

Detail of 1811 Warren Map w/ overlay of Griswold Map of Reconstructed Native Settlement circa 1625



Detail of 1856 Chace Map of Fairfield County



Approximate Location
of Archaeological Site

- Historic
- Pre-Contact
- Unknown

Predicted Archaeological
Soil Sensitivity

- | | |
|---|--|
| High | Variable |
| Moderate | Poor |
| Low | Unknown |



February 4, 2016

Appendix A

Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15
Interchange Project, State Project No. 102-358, Norwalk, Connecticut.

Appendix B

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

Location: Glover Avenue over the Norwalk River, Norwalk

Structure type (as built): Stone arch

Year built: 1912

National Register eligibility recommendation from 1991: Eligible

Changes since the 1991 inventory:

- No apparent changes.
- The index to the Connecticut Historic Preservation Collection at the University of Connecticut archives lists a 2000 state-level documentation for the bridge.

Recommendation: The bridge retains its historic character and should continue to be considered National Register-eligible.

Bridge as photographed for the 1991 inventory.





South elevation, camera facing northeast.



North elevation and west end, camera facing southeast.



Detail of masonry, north elevation, camera facing southeast.



West end, camera facing east.



East end, camera facing west.



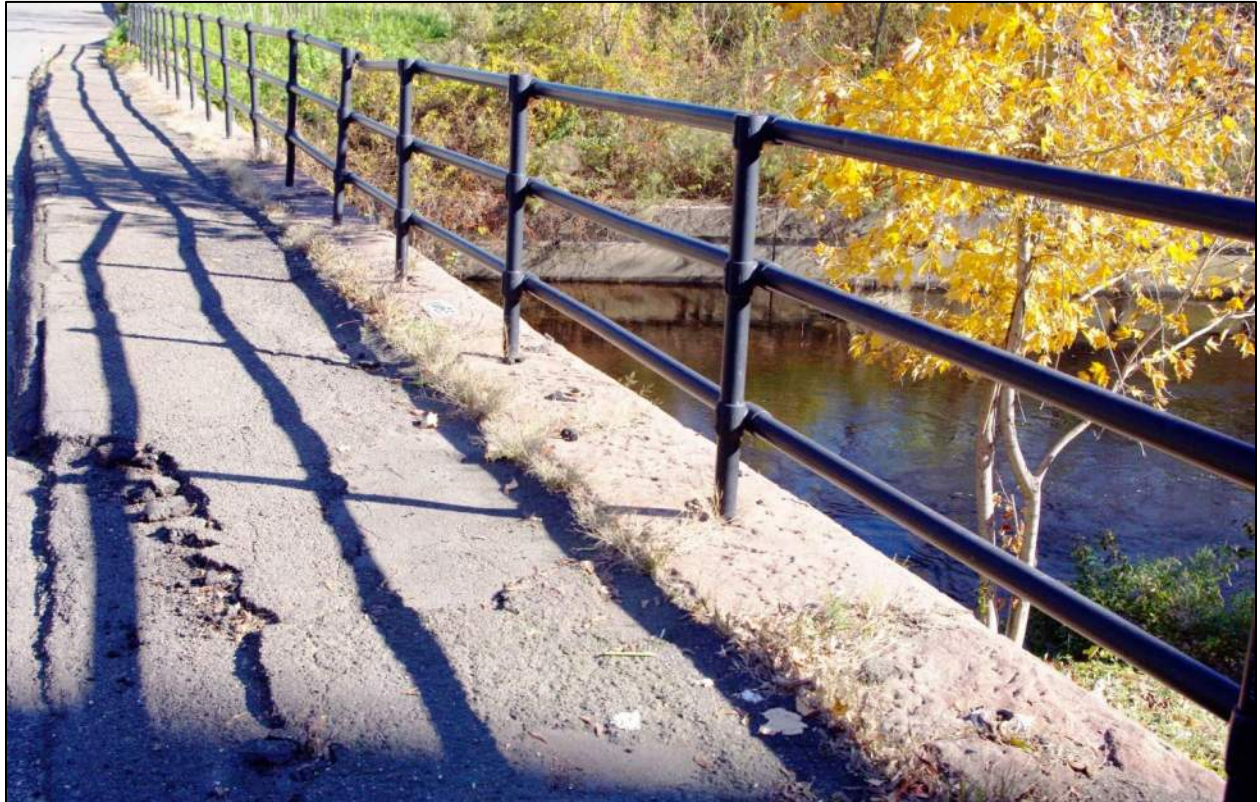
Detail of masonry, underside of bridge, camera facing east.



Detail of masonry, south elevation, camera facing northeast.



Detail of masonry, south elevation, camera facing north.



Detail of railing and capstones, camera facing east.



Detail of inscribed south elevation capstone, camera facing south.

Update form prepared by:

Marguerite Carnell, Architectural Historian
Archaeological and Historical Services, Inc.
569 Middle Turnpike/P.O. Box 543
Storrs, CT 06268

11/08/2018



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Identification

Bridge # 4155 name(s) _____

Location

street Glover Avenue feature crossed Norwalk River
city, town(s) Norwalk [] vicinity of _____
state Connecticut code CT county Fairfield code 001

Ownership

[] private _____
[x] public - local [] public - state

Use

[x] highway [] pedestrian only [] closed [] by-passed [] other _____

Description

Form arch-deck Design _____
Principal material masonry
Abutment material masonry

Date of construction 1912

Dimensions

Number of spans 2 Overall length 90' Maximum span length 40'
Roadway width 23' Vertical clearance unlimited
Height over feature spanned c.9' Skew _____
Depth of construction c.13'
Setting commercial

Present and historical appearance:

This 2-span masonry-arch bridge features the unusual and distinctive use of polychrome stonework as a means of enhancing its appearance. The elliptical arches are each outlined by cut ring stones of brownstone, while the spandrels are a random ashlar of granite blocks. The original curbs are rusticated brownstone blocks, to which a modern pipe rail has been added.

Statement of SignificanceLevel of significance: ☐ national ☐ state ☒ localNational Register Criteria: ☒ A ☐ B ☒ C ☐ DExceptions: ☐ moved ☐ less than 50 years old ☐ other _____**Areas of significance****Period of significance****Significant dates**

Engineering _____

1912

1912

Transportation _____

Significant person(s): _____

Designer _____

Fabricator _____

Contractor _____

This bridge is significant as an unusually handsome example of the early 20th-century stone-arch bridge. The polychrome masonry and the thin spandrels above the elliptical openings combine to give this bridge an usually graceful appearance. The bridge is also associated with the spread of dense settlement in the town of Norwalk. Throughout the 19th century, growth had been concentrated in the shorefront area that was incorporated as the separate borough of South Norwalk, and the northern end of town remained more thinly populated, with many active farms. By the time this bridge was constructed, in 1912, the northern farmland had begun to give way to suburban growth, stimulated in large part by a trolley line that followed the line of what is today Route 7. In taking on this project, and paying the substantial sum of \$8,500 for the bridge, the town government acknowledged its own new role in response to rapid development.

Major Bibliographic References Town of Norwalk, Annual Report, 1913, p. 3.

Previous documentation on file:

☐ listed on or ☐ eligible for the National Register

date _____

☐ located within listed district

name _____

date of listing _____

☐ contributing ☐ noncontributing ☐ undetermined☐ HAER inventory; page _____☐ local survey☐ known archaeological site nearby: _____**Geographical Data**

UTM Reference

1 8 6 3 1 9 9 0 4 5 5 5 6 4 0

Quadrangle (scale: 1:24000)

Norwalk North

Form Prepared By

name/title Matthew Roth and Bruce Clouette

organization Historic Resource Consultants, Inc.

street & number 55 Van Dyke Avenue

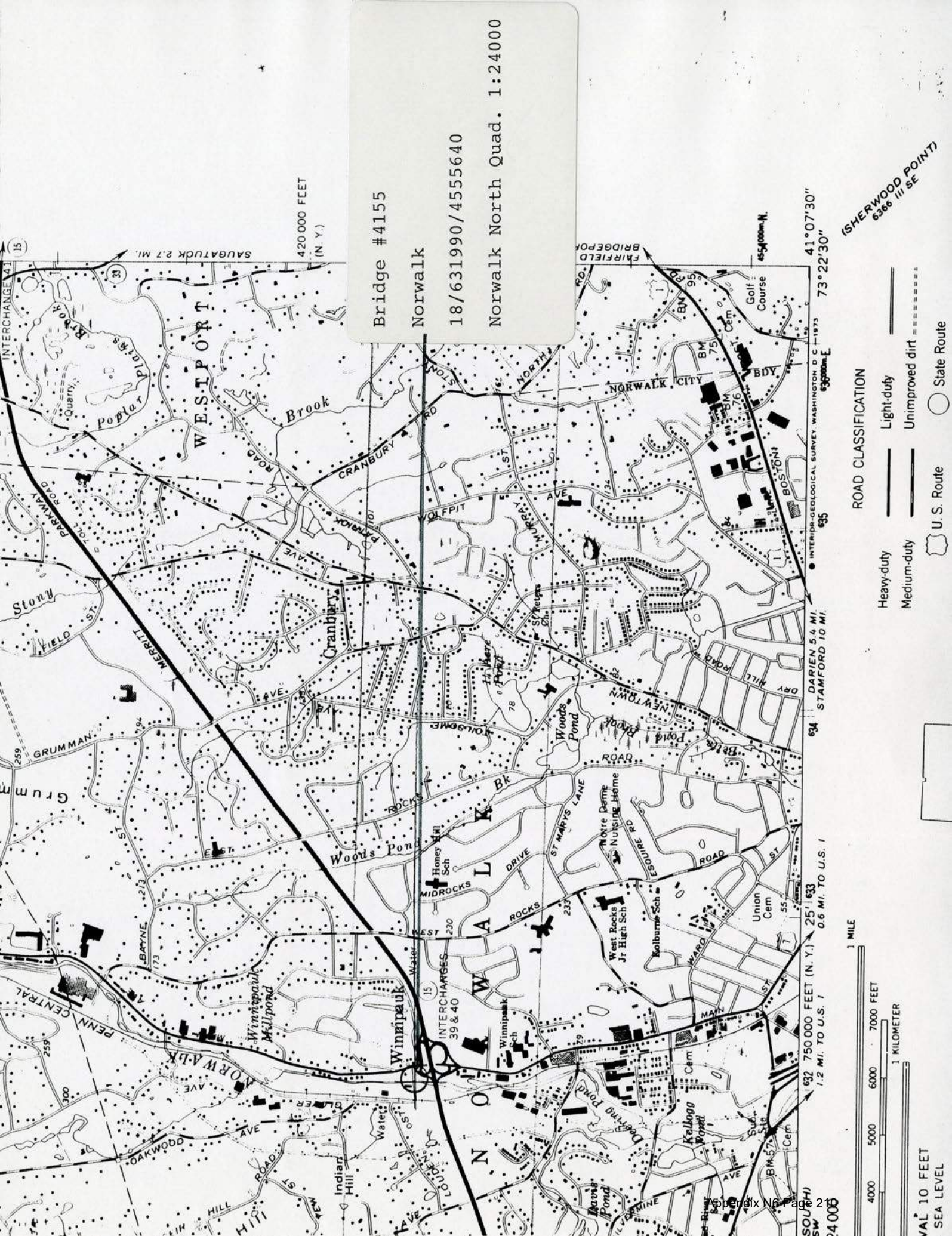
city or town Hartford

date November, 1990

telephone (203) 547-0268

state Connecticut

Appendix N6 Page 2106



Bridge #4155

Norwalk

18/631990/4555640

Norwalk North Quad. 1:24000

ROAD CLASSIFICATION

- Heavy-duty
- Medium-duty
- Light-duty
- Unimproved dirt
- U. S. Route
- State Route

(SHERWOOD POINT)
6356 III SE

1 MILE

4000 5000 6000 7000 FEET

1 KILOMETER

VAL 10 FEET
SEA LEVEL

41°07'30"
73°22'30"

DAREN 5.4 MI.
STAMFORD 10 MI.

632 750 000 FEET (N. Y.) 25' 1633
1.2 MI. TO U.S. 1 0.6 MI. TO U.S. 1

24000



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Bridge #4155
Norwalk

View Southwest
Negative MMM-9



View Northeast
Negative MMM-2





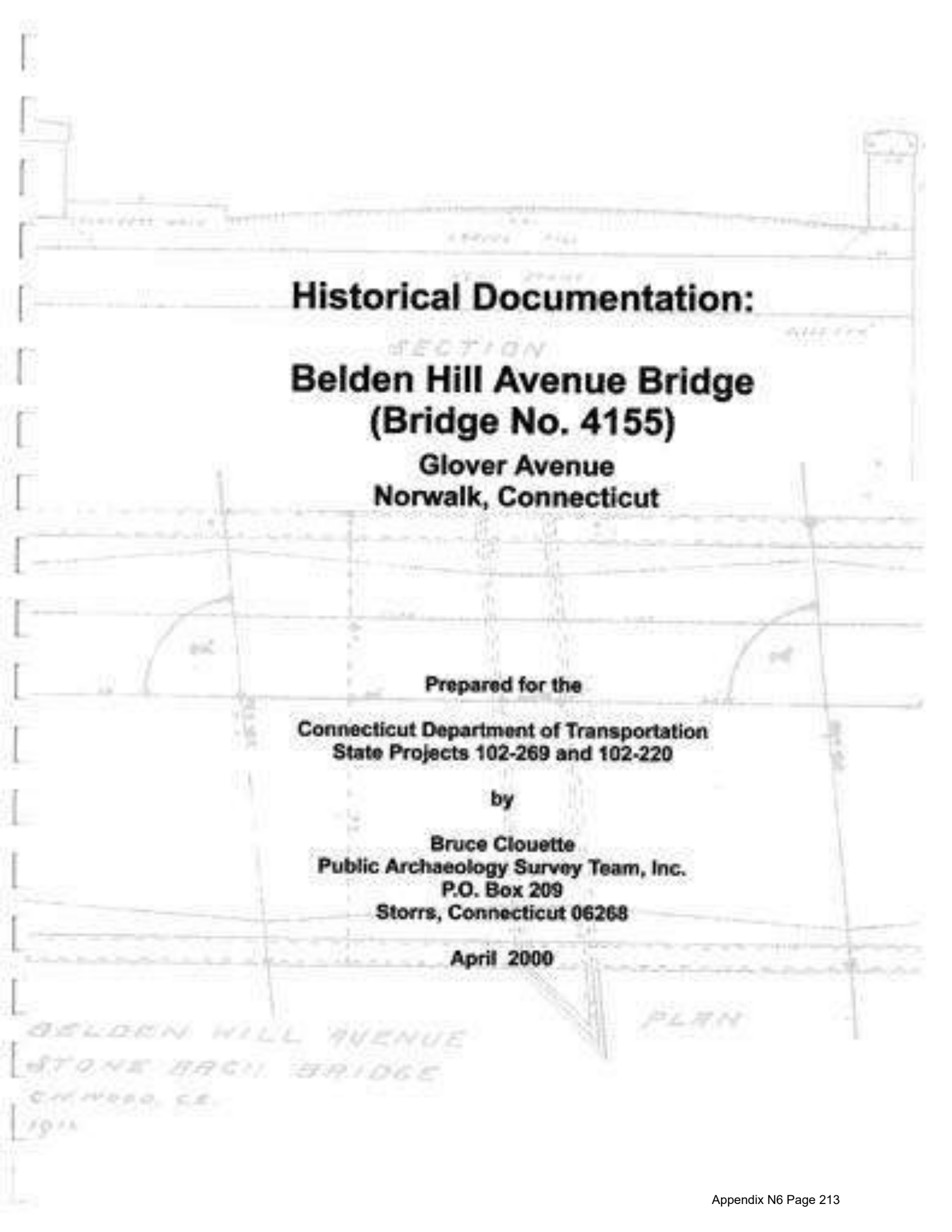
STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Bridge #4155
Norwalk

View Northeast
Negative MMM-7



The background of the document is a faint architectural drawing. The top portion shows a cross-section of a bridge with a central span and two side spans, supported by piers. The bottom portion shows a plan view of the bridge, with the main span and side spans clearly delineated. The drawing is in a technical, line-art style.

Historical Documentation:

Belden Hill Avenue Bridge (Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Prepared for the

Connecticut Department of Transportation
State Projects 102-269 and 102-220

by

Bruce Clouette
Public Archaeology Survey Team, Inc.
P.O. Box 209
Storrs, Connecticut 06268

April 2000

BELDEN HILL AVENUE
STONE ARCH BRIDGE
CHANDLER
1911

PLAN

**Historical Documentation:
Belden Hill Avenue Bridge
(Bridge No. 4155)**

**Glover Avenue
Norwalk, Connecticut**

**Prepared for the
Connecticut Department of Transportation
State Projects 102-269 and 102-220**

by

**Bruce Clouette
Public Archaeology Survey Team, Inc.
P.O. Box 209
Storrs, Connecticut 06268**

April 2000

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155) Norwalk, Connecticut

Bridge No. 4155, originally known as the Belden Hill Avenue Bridge, crosses the Norwalk River just west of Route 7 in the Winnipauk section of Norwalk, Connecticut; today this short section of road is considered part of Glover Avenue, which intersects Oakwood Avenue/Belden Hill Avenue a short distance from the west end of the bridge. Built in 1912 by the Town of Norwalk, the bridge is a two-span masonry-arch structure built of local stone and trimmed with Portland brownstone. The bridge was included in the Connecticut Department of Transportation's 1990 survey of historic highway bridges, in which it was recommended as being eligible for inclusion on the National Register of Historic Places as an example of stone-arch bridge construction.

This documentation was undertaken in connection with the proposed reconstruction of the Route 7/Route 15 Interchange, which lies just south of the bridge, in order to create a permanent record of the bridge and its historical associations. The documentation, which is intended to supplement the existing 1990 inventory form and photographs of the bridge, consists of the following components:

- additional information on the bridge's original appearance
- an expanded statement of significance, based upon additional historical research
- additional bibliographical citations to the *Norwalk Hour* and other primary sources
- copies of the original drawings for the bridge, reproduced from microform in the records of the Norwalk Public Works Department
- twelve 5 x 7" black-and-white photographs of the bridge taken in March 2000, along with an index and site plan

The text has been formatted onto Historic Bridge Inventory Form continuation sheets in order to be consistent with the existing inventory form. The original text and photographs will be submitted to the Connecticut State Historic Preservation Office for permanent archiving.

This documentation was undertaken by Bruce Clouette, historian with Public Archaeology Survey Team, Inc. of Storrs, Connecticut. It fulfills a stipulation in a Memorandum of Agreement between the Federal Highway Administration and the Connecticut State Historic Preservation Office, executed on November 15, 1999. The reconstruction of the Route 7/15 interchange is being undertaken as Federal Aid Project No. NH-7 (106) and State Project Nos. 102-269 and 102-220.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Description:

The bridge's appearance has changed little since the bridge inventory of 1990. However, the following additions and clarifications can be added as a result of the subsequent field evaluation and additional historical research:

- ♦ The south-side brownstone coping includes, at the center of the bridge, a dedicatory tablet inscribed as follows:

Erected -- 1912
Alfred Avison
James A. Brown
John Devine
Selectmen

Charles N. Wood, C.E.

- ♦ The current railings are modern but are probably close in appearance to the bridge's original railings. Although the engineer's drawings show the bridge with cobblestone railings, newspaper reports indicate that these were dropped in favor of a 3-rail tubular railing, 3 1/2 feet high (*Norwalk Hour*, January 3, 1913, p. 12).
- ♦ The current remnants of mortar probably represent a series of repointings rather than any original material. The drawings call for "mortar work" only where the stone is set into the ledge outcropping; the rest is indicated as "dry load."
- ♦ The drawings show a sidewalk on one side only, but it is likely that the current walks on both sides are early if not original, since the *Norwalk Hour* (January 3, 1913, p. 12) mentioned "cement sidewalks."
- ♦ The source of the majority of the stone, a local granitic gneiss, was a nearby quarry on Main Street on what was then known as the "Coleman property." The Portland brownstone for the coping and ring stones was brought in by rail. (*Norwalk Hour*, August 7, 1912, p. 3; August 9, 1912, p. 3).
- ♦ The original road surface was crushed stone.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Statement of Significance:

As noted on the 1990 inventory form, the bridge shows a strong aesthetic intent as well as fulfilling a utilitarian purpose. The Town of Norwalk had earlier replaced at least two other bridges in town with stone arches of a similar type, part of a trend (especially evident in the towns of Fairfield County) which, for lack of a better term, could be called the "Suburb Beautiful" movement. Like the "City Beautiful" movement that was transforming cities at the time, planning efforts in Connecticut's more cosmopolitan towns showed a marked concern for the aesthetic appearance of public works projects. For the most part, however, these towns avoided the overly formal, Neo-Classical designs prevalent in urban areas in favor of a more "natural," even rustic, appearance, as amply illustrated by this bridge.

Norwalk had a professional town engineer to design projects such as the new Winnipauk bridge. Charles N. Wood (1847-1913) was a native of Norwalk who learned surveying and engineering like most members of his generation, by participating in the layout and construction of rail lines; in his early years Wood worked on those of the Boston, Hartford, and Erie, the Massachusetts Central, and the Vineland (New Jersey) Railroads. He gained experience with municipal services as the assistant city engineer in Jersey City in 1869 and came to work in Norwalk around 1880, where he remained until his death, which occurred on March 19, 1913 just three weeks after the Glover Hill Avenue bridge was completed. In addition to laying out streets and designing bridges, Wood created the Norwalk water and sewer systems during his long tenure. He was active in community life as a member of the Masons and Knights Templar. The *Norwalk Hour*, no doubt intending to pay him high praise, observed that "Mr. Wood was a democrat in politics, but not one of the violent kind." (March 19, 1913, p. 1).



*Charles N. Wood, the engineer
who designed the bridge*

Winnipauk was an outlying village within the town on Norwalk that centered around the railroad depot, several stores, and two factories on the Norwalk River that had been built for the production of woollens in the 19th century. In the early 20th century, the completion of the trolley line on Wilton Road (Route 7) linked Winnipauk to the more



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Statement of Significance (continued):

urbanized parts of town to the south. Winnipauk maintained a separate identity, however, with unique community groups and events and, usually, its own column in the local newspaper, the *Norwalk Hour*.

This circumstance was fortunate for history, since the *Hour's* Winnipauk correspondent filed a series of reports, first daily and then weekly, that chronicled the construction of the bridge in great detail, unusual for any small bridge project of the period. From this source we learn that the contractor for the bridge, Timothy F. Foley of nearby South Norwalk, had four steam derricks devoted to the job: two at the construction site, where foreman Thomas F. Mullens of Westport supervised "a large gang of men," another at the Main Street quarry where stone for the bridge was extracted, and the fourth at the railroad station for unloading the brownstone for the coping and arch rings. The work appears to have been a combination of hand labor and machine assistance. For example, to prepare the bedrock for the footings, a steam derrick was used to raise and lower a large bucket for hauling out manually loaded earth and stone. The bedrock itself was broken up by blasting.

The bridge was built over a seventh-month period. The awarding of the contract was reported in the *Commercial Record* on August 3, 1912; Foley had brought his machinery to the site by August 6; and a temporary bridge for service during construction was ready by August 21. The following month, the abutments and center pier were finished, using stone taken from the bedrock excavation. Despite some unexpected ground water and difficulty maintaining temporary gas lines, the bridge was substantially in place by January 1913, and the *Hour* reported its completion on March 1, 1913.

Although some residents were disappointed that the project did not include lights, the bridge appears to have fulfilled both its practical and scenic functions. No formal dedication was reported in the newspaper, but the *Hour* praised the structure as "a great boon to the Winnipauk community" and "a credit to Winnipauk and the town." (January 3, 1913; March 1, 1913, p. 3).



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Revised Bibliography:

Clouette, Bruce, and Matthew Roth. *Connecticut's Historic Highway Bridges*. Newington, Conn.: Connecticut Department of Transportation, 1991.

Commercial Record, August 3, 1912, p. 18.

Connecticut Department of Transportation. Historic Bridge Inventory, 1990. Original inventory forms deposited with Dodd Research Center, University of Connecticut, Storrs.

Norwalk Hour, July 31, 1912 - March 1, 1913.

Norwalk, Town of. *Annual Report*, 1913, p. 3.

Norwalk, Town of. Public Works Department. Bridge Drawing Files.

Wood, Charles N. Obituary, *Norwalk Hour*, March 19, 1913, p. 1.

_____. Obituary, *Proceedings of the Connecticut Society of Civil Engineers*, 1913, p. 87.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Photographs

The following photographs were all taken in March 2000 by Bruce Clouette, historian with Public Archaeology Survey Team, Inc., of Storrs, Connecticut.

1. South elevation of bridge from west bank of Norwalk River, camera facing north
2. South elevation of bridge from east bank of Norwalk River, camera facing northwest
3. North elevation of bridge, camera facing southeast
4. Traffic level from east end, camera facing west
5. Traffic level from west end, camera facing east
6. Detail of water pipe mounted on south elevation, camera facing northwest
7. Detail of cutwater, center pier, north elevation, camera facing east
8. Detail of stonework on underside of arch, west arch, camera facing northeast toward center pier
9. Detail of ring stones, showing added mortar
10. Detail of spandrel stonework and brownstone coping
11. Detail of modern pipe rail, with remnants of original pipe rail visible on top surface of coping stones
12. Detail of dedicatory tablet set into coping, center of bridge, south side

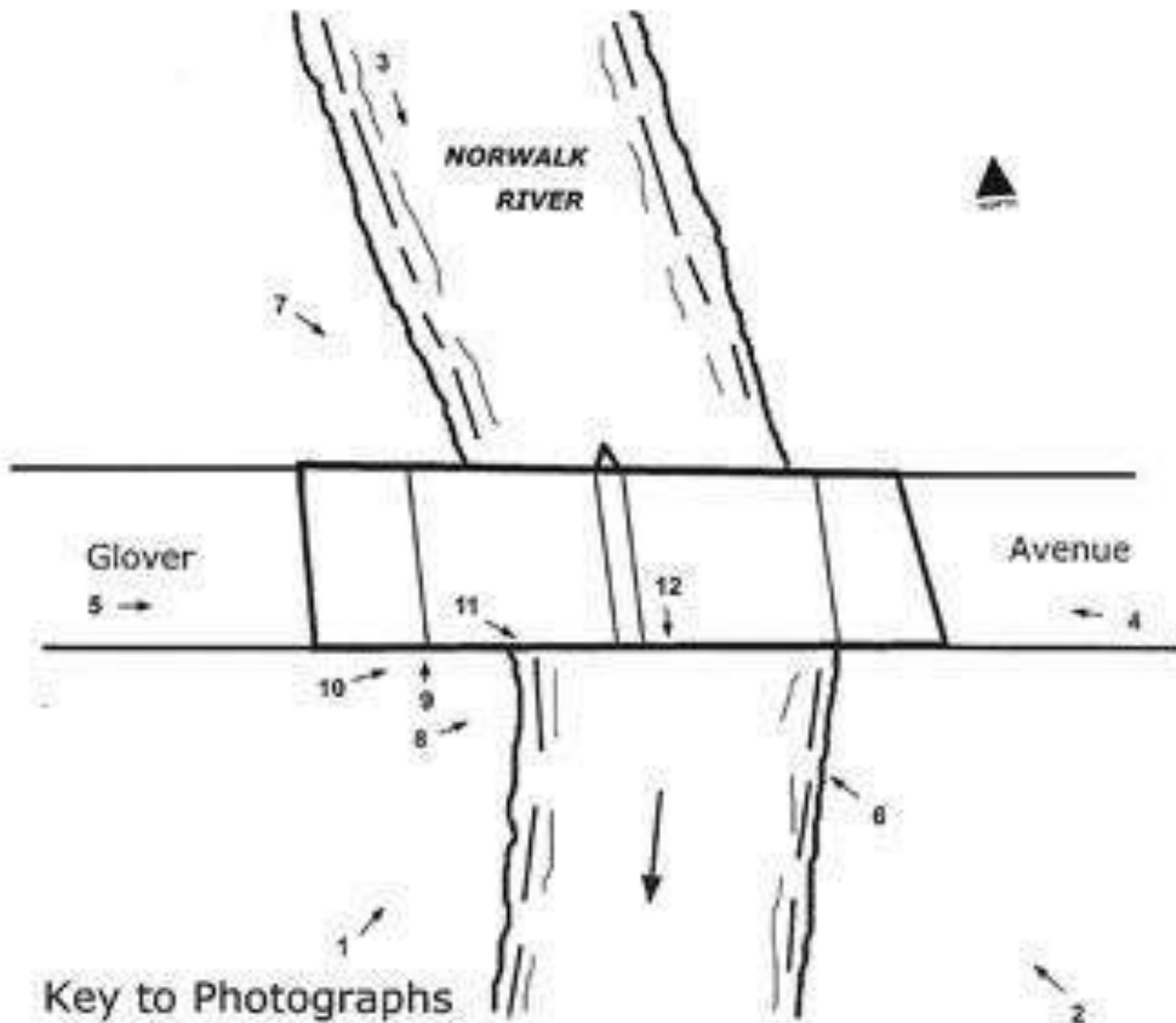


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut





STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



1. South elevation of bridge from west bank of Norwalk River, camera facing north

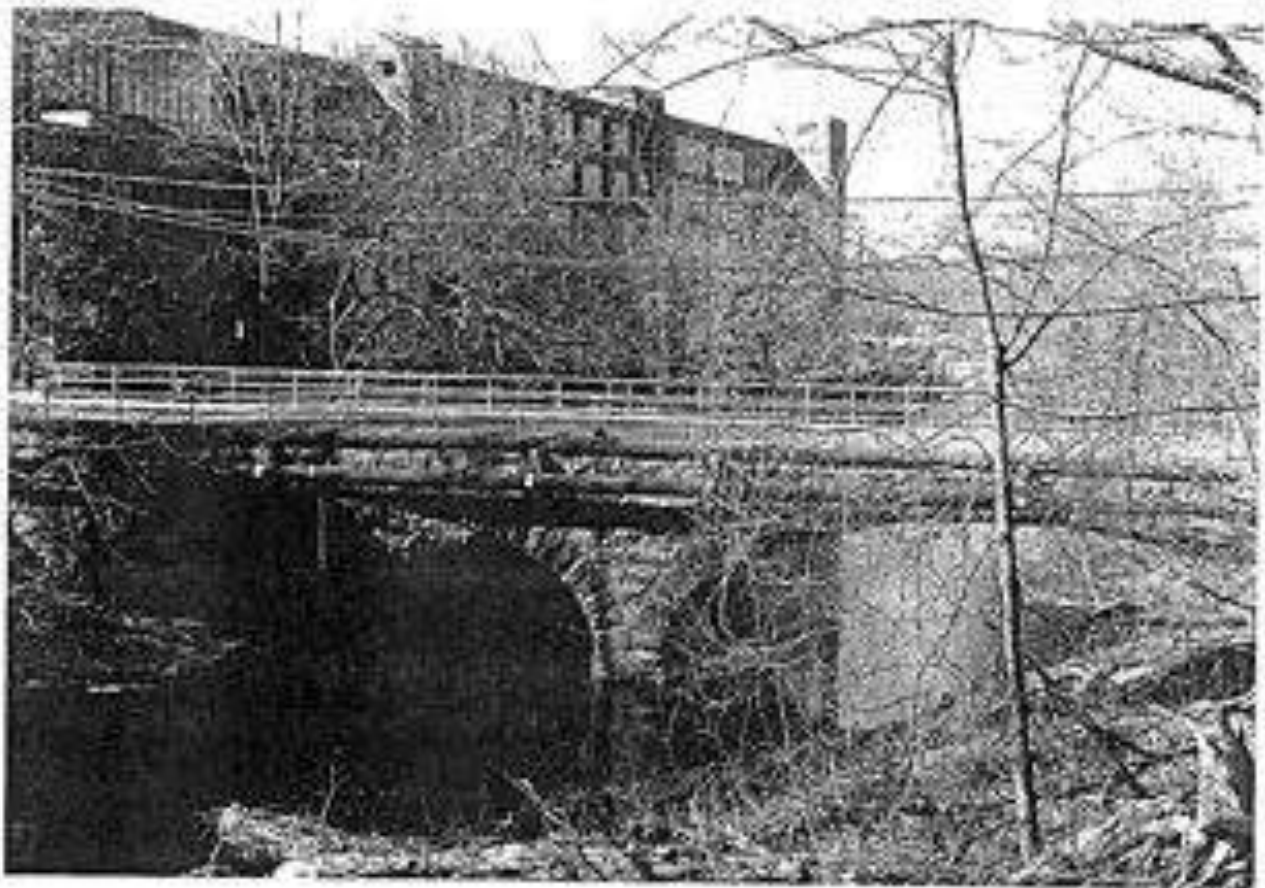


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



2. South elevation of bridge from east bank of Norwalk River, camera facing northwest



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



3. North elevation of bridge, camera facing southeast



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



4. Traffic level from east end, camera facing west



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



5. Traffic level from west end, camera facing east

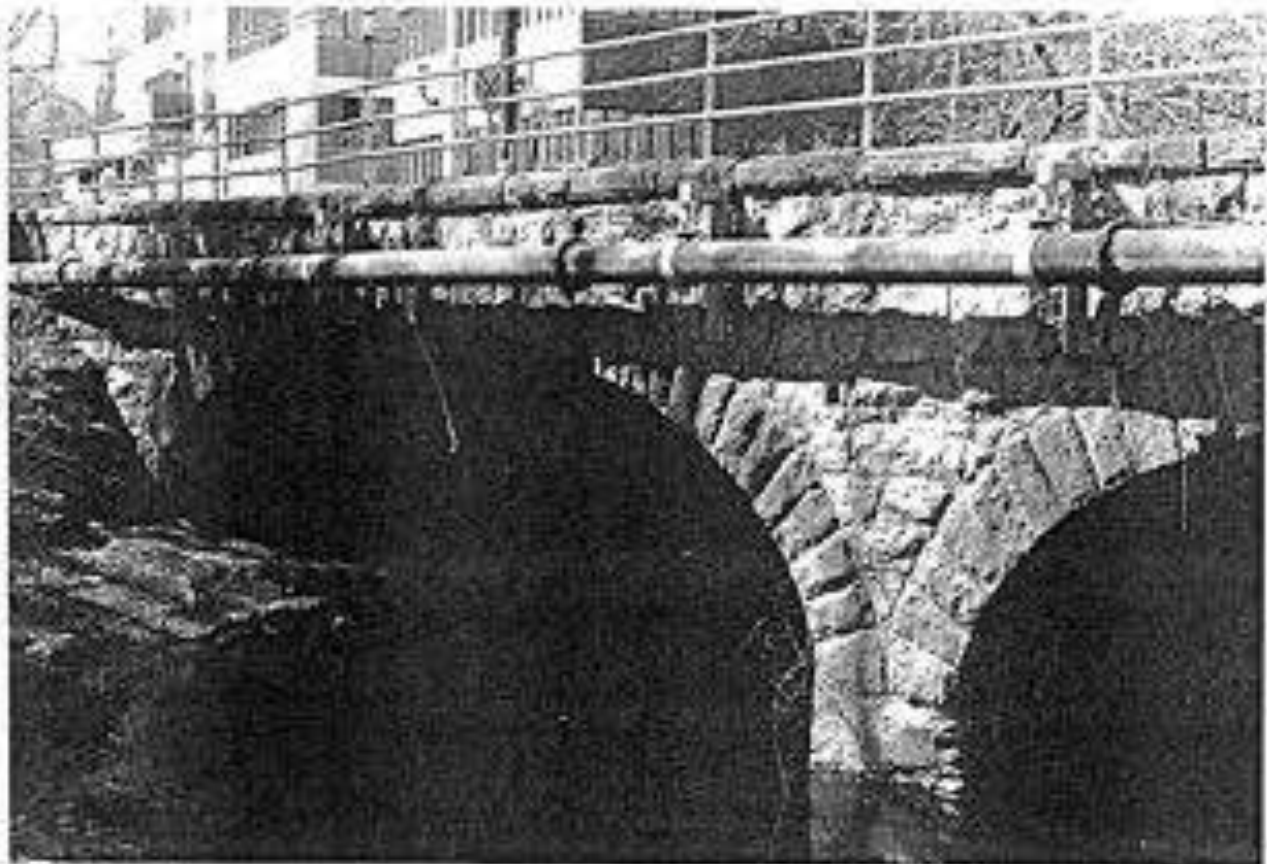


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



6. Detail of water pipe mounted on south elevation, camera facing northwest

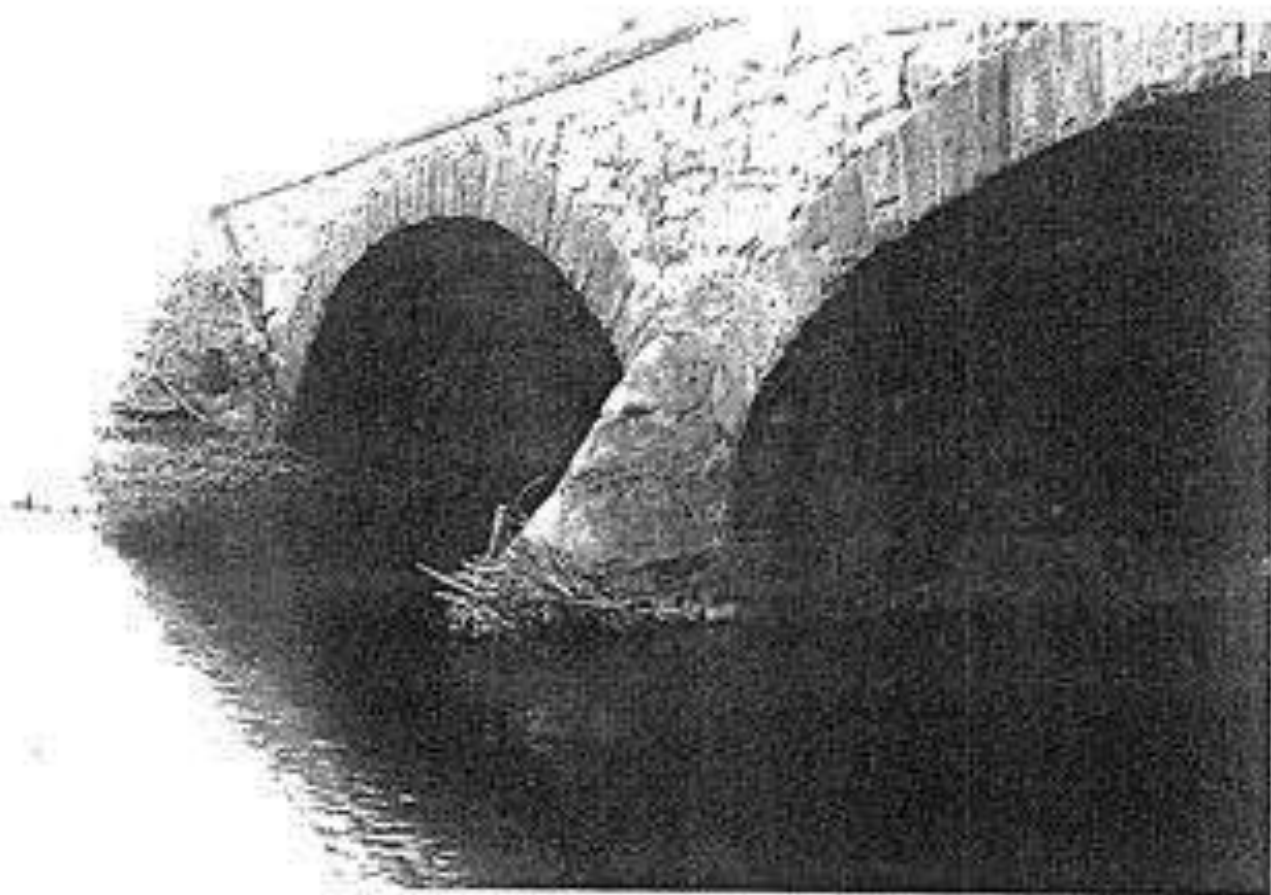


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



7. Detail of cutwater, center pier, north elevation, camera facing east

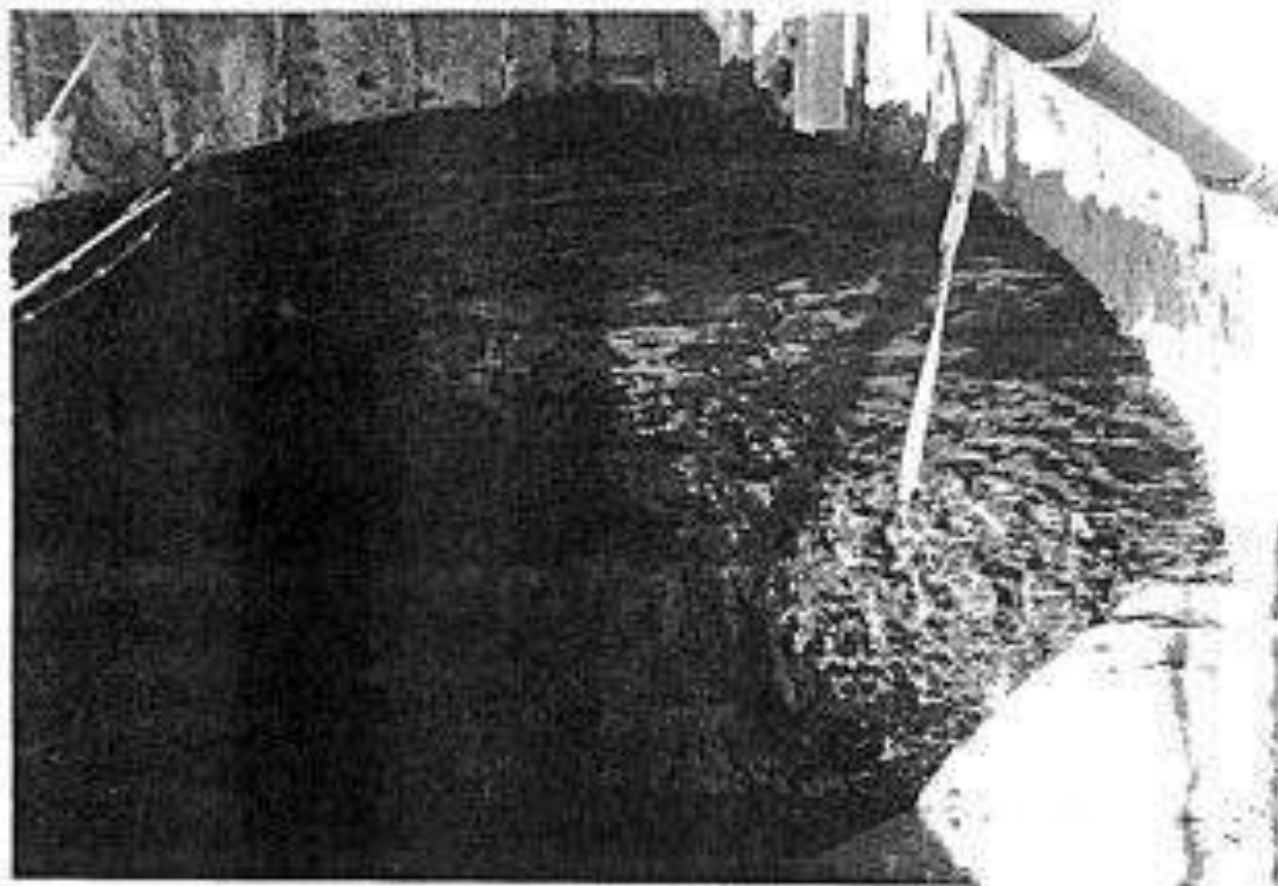


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



8. Detail of stonework on underside of arch, west arch, camera facing northeast toward center pier

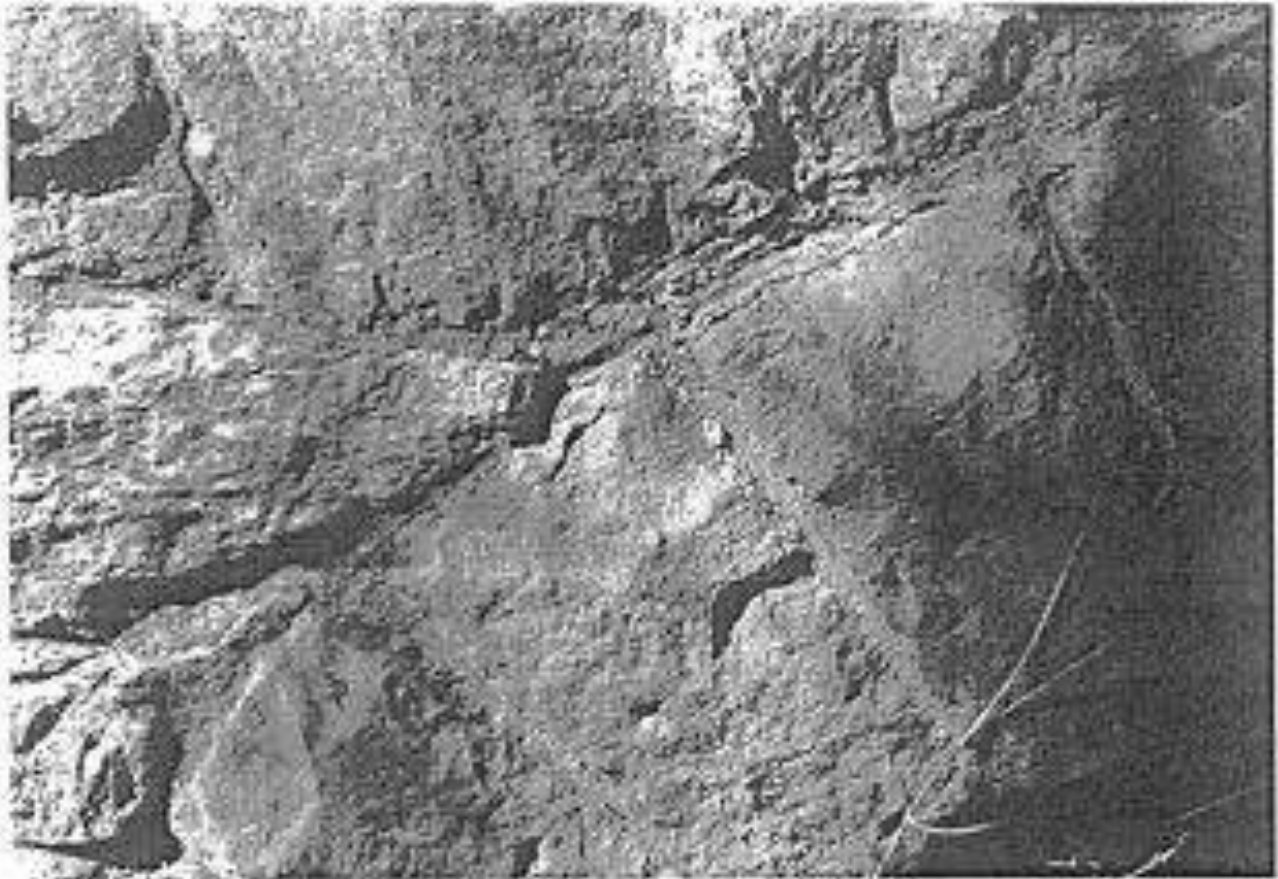


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



9. Detail of ring stones, showing added mortar



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



10. Detail of spandrel stonework and brownstone coping

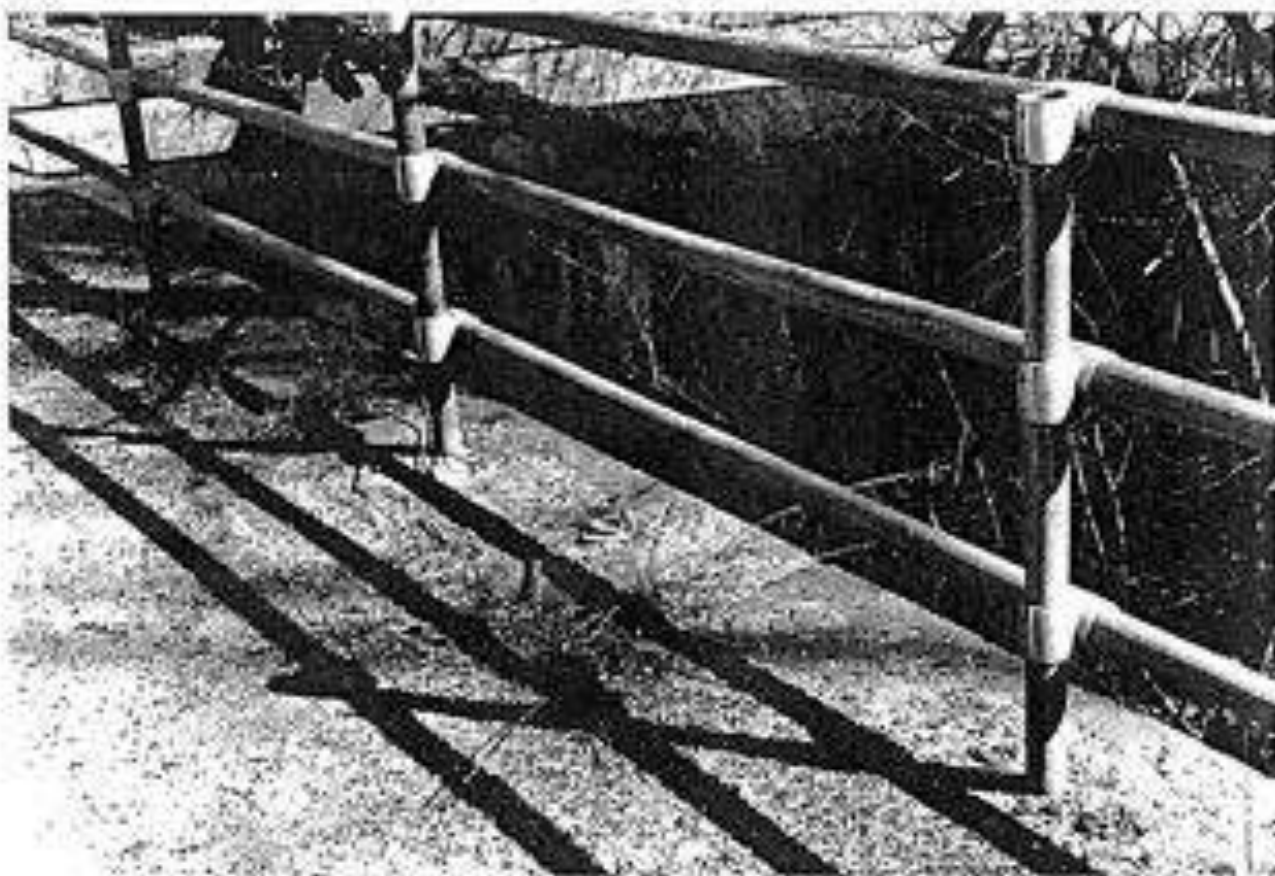


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



11. Detail of modern pipe rail, with remnants of original pipe rail visible on top surface of coping stones



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



12. Detail of dedicatory tablet set into coping, center of bridge, south side



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

List of Original Drawings:

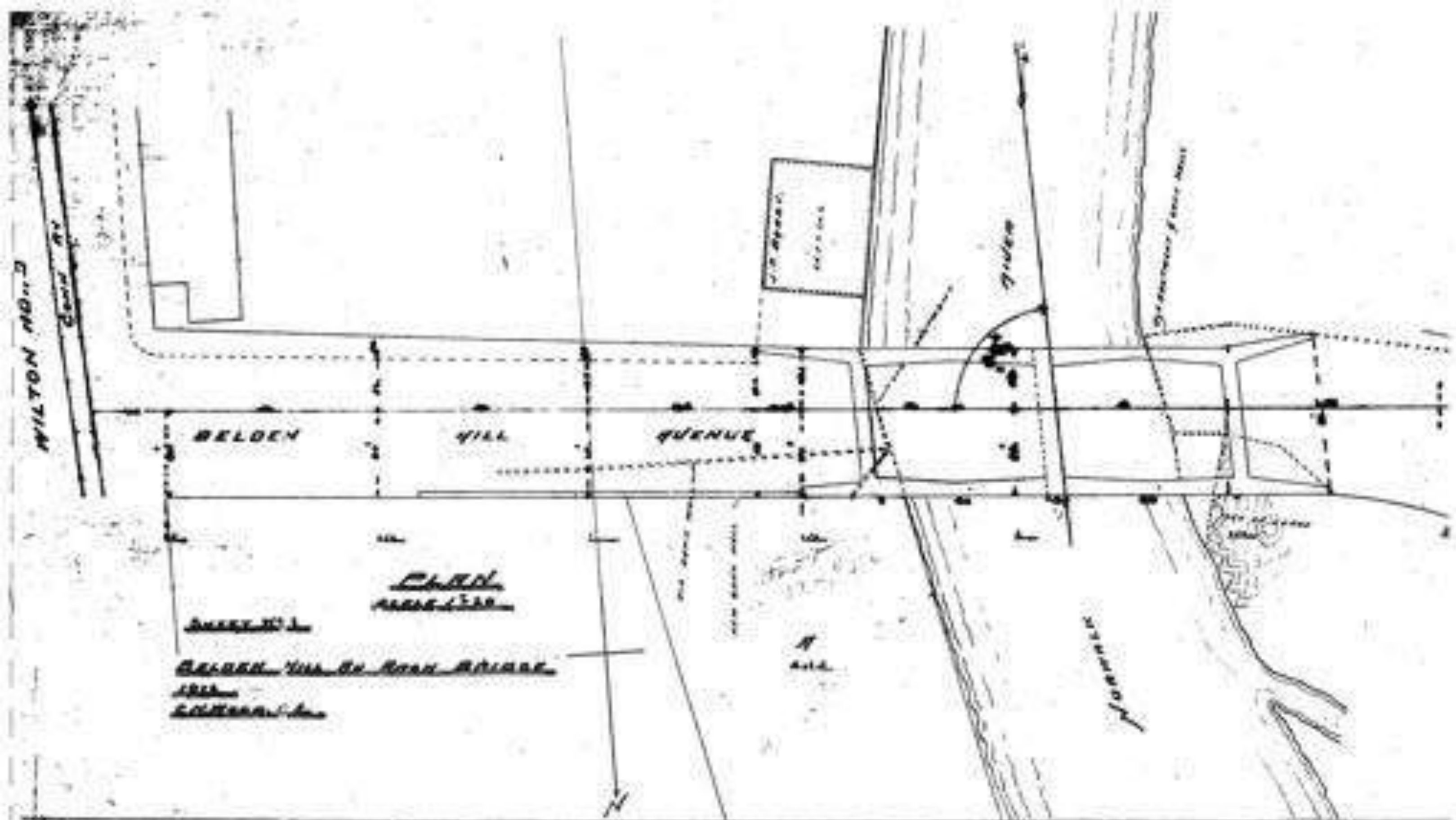
"Plan, Belden Hill, An Arch Bridge, 1912"

"Elevation, Belden Hill Avenue Bridge, 1912"

"Plan for Centers, Belden Hill Avenue Bridge"

"Plan and Section, Belden Hill Avenue Stone Arch Bridge, 1912"

All drawings reproduced from microform, Norwalk Public Works Department.





**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**DRAFT
Environmental Assessment and
Environmental Impact Evaluation**

**Appendix I
Visual Impact Study**

June 26, 2020

Prepared for:
Connecticut Department of Transportation
Federal Highway Administration

Table of Contents

1.0	Background and Regulatory Context.....	1.1
2.0	Existing Conditions	2.1
2.1	VISUAL CHARACTER OF THE VIAA.....	2.1
2.2	VISUAL QUALITY OF VIAA.....	2.2
2.3	VIEWER GROUPS AND VIEWER EXPOSURE.....	2.2
2.4	VISUAL ENVIRONMENT OF LANDSCAPE UNITS	2.6
3.0	POTENTIAL VISUAL IMPACTS	3.18
3.1	ALTERNATIVES.....	3.18
3.2	POTENTIAL VISUAL IMPACTS	3.20
4.0	MITIGATION MEASURES.....	4.66

FIGURES

Figure 2.1.1	Visual Impact Assessment Area	1.2
Figure 2.1	Typical Merritt Parkway Visual Character	2.1
Figure 2.2	Typical Route 7 Visual Character	2.1
Figure 2.3	Merritt Parkway East of Main Avenue Interchange	2.3
Figure 2.4	Merritt Parkway Looking North to SB Route 7 Exit and Eversource Power Lines	2.4
Figure 2.5	Route 7 Looking South to Merritt Parkway Overpass	2.3
Figure 2.6	Merritt Parkway Looking North to Exist 39B for Main Avenue	2.7
Figure 2.7	Route 7 Looking South to Exit for Merritt Parkway South	2.7
Figure 2.8	Route 7 Looking South to Bridge over Perry Avenue	2.8
Figure 2.9	Merritt Parkway Looking South; Glover Avenue Apartment Building on Right	2.8
Figure 2.10	Merritt Parkway Mainline Bridge between Ramp Structures over Perry Avenue ...	2.9
Figure 2.11	Route 7 Bridge over Perry Avenue.....	2.10
Figure 2.12	Merritt Parkway - Filtered Views from Rae Lane Residential Backyards.....	2.10
Figure 2.13	West Rocks Road View of Merritt Parkway, looking North	2.11
Figure 2.14	Creeping Hemlock Drive, view south to Merritt Parkway	2.12
Figure 2.15	Lakewood Drive View South to Creeping Hemlock Drive and Merritt Parkway	2.12
Figure 2.16	Main Avenue Looking North to Merritt Parkway Mainline Bridge.....	2.13
Figure 2.17	Main Avenue Looking North to Merritt Parkway Mainline Bridge.....	2.14
Figure 2.18	Main Avenue, Looking North toward Merritt Parkway	2.14
Figure 2.19	Main Avenue North of Merritt Parkway; Looking South	2.15
Figure 2.20	Glover Avenue Looking North toward Metro-North Merritt 7 Train Station.....	2.15
Figure 2.21	Glover Avenue Bridge over the Norwalk River, Looking toward Main Avenue	2.16

Figure 2.22 Merritt Parkway Mainline Bridge over Norwalk River, Viewed from Glover Avenue Bridge	2.16
Figure 2.23 Merritt Parkway Mainline Bridge over Danbury Branch Metro-North Track, Viewed from Glover Avenue.....	2.17
Figure 3.1 Visual Impact Assessment Viewpoint Locations – Alternative 26	3.21
Figure 3.2 Visual Impact Assessment Viewpoint Locations - Alternative 21D	3.21
Figure 3.3 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Existing View	3.23
Figure 3.4 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 21D	3.24
Figure 3.5 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 26.....	3.24
Figure 3.6 Viewpoint #2 – View Looking North on Route 7 – Existing View	3.26
Figure 3.7 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 21D	3.27
Figure 3.8 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 26	3.27
Figure 3.9 Viewpoint #3 – View Looking North on Route 7 – Existing View	3.29
Figure 3.10 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 21D	3.29
Figure 3.11 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 26	3.30
Figure 3.12 Viewpoint #4 – View Looking North on Main Avenue – Existing View	3.32
Figure 3.13 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 21D	3.32
Figure 3.14 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 26	3.33
Figure 3.15 Viewpoint #5 – View Looking South on the Merritt Parkway – Existing View	3.34
Figure 3.16 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D	3.35
Figure 3.17 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26.....	3.35
Figure 3.18 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Existing View ..	3.37
Figure 3.19 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 21D	3.38
Figure 3.20 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 26.....	3.38
Figure 3.21 Viewpoint #7 – View Looking South on the Merritt Parkway – Existing View	3.40
Figure 3.22 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D	3.41
Figure 3.23 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26.....	3.41

Figure 3.24 Viewpoint #8 – View Looking South on Main Avenue – Existing View	3.42
Figure 3.25 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 21D	3.43
Figure 3.26 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 26.....	3.43
Figure 3.27 Viewpoint #9 – View Looking East on Glover Avenue – Existing View.....	3.45
Figure 3.28 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 21D	3.45
Figure 3.29 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 26.....	3.46
Figure 3.30 Viewpoint #10 – View Looking South From Glover Avenue – Existing View	3.48
Figure 3.31 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 21D	3.48
Figure 3.32 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 26.....	3.49
Figure 3.33 View Looking South on Route 7 – Existing View.....	3.51
Figure 3.34 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 21D	3.51
Figure 3.35 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 26	3.52
Figure 3.36 Viewpoint #12 – View Looking South on the Merritt Parkway – Existing View	3.53
Figure 3.37 Viewpoint #12 – View Looking South on the Merritt Parkway –	3.54
Figure 3.38 Viewpoint #12 – View Looking South on the Merritt Parkway –	3.54
Figure 3.39 Viewpoint #13 – View Looking North on Route 7 – Existing View	3.56
Figure 3.40 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 21D	3.57
Figure 3.41 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 26	3.57
Figure 3.42 Viewpoint #14 – View Looking South on Route 7 – Existing View	3.59
Figure 3.43 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 21D	3.59
Figure 3.44 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 26	3.60
Figure 3.45 Viewpoint #15 – View Looking North on Perry Avenue – Existing View	3.62
Figure 3.46 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 21D	3.62
Figure 3.47 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 26.....	3.63
Figure 3.48 Viewpoint #16 – View Looking South on Perry Avenue – Existing View	3.64
Figure 3.49 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 21D	3.65

Figure 3.50 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 26.....	3.65
---	------

1.0 BACKGROUND AND REGULATORY CONTEXT

A Visual Impact Assessment (VIA) was conducted according to the FHWA *Guidelines for the Visual Assessment of Highway Projects (2015)* [1]. Information was collected through desktop review and site visits. The VIA components included:

1. Establishing the existing visual environment by defining and identifying the study area, its visual character, key visual resources, the key viewers and their sensitivities to their context and adjacent areas;
2. Identifying the key views and the range of significant visual resources for each viewer group;
3. Identifying historic sites, buildings and other resources within the visual study area and evaluate the potential for impact by the project alternatives on views;
4. Preparing visual simulations to depict existing conditions and compare them to the design alternatives as seen from key viewpoints at the completion of the project, and;
5. Assessing the visual impacts of each design alternative including changes to significant visual resources and probable viewer response to these changes.

Based on a review of area mapping and project documentation, including prior visual analyses, several primary areas were identified where the existing viewers and viewer groups and their current visual environments could potentially be affected by the proposed project alternatives. These locations include:

1. views of the proposed improvements in both directions of the Merritt Parkway and Route 7;
2. views of the Merritt Parkway along Main Avenue in both directions towards the Project;
3. views of the Merritt Parkway, Route 7 and alterations to the local streets from streets in surrounding residential neighborhoods: Indian Hill Road, Perry Avenue, Rae Lane, April Lane, Linden Lane, Linden Heights, Skyview Lane, West Rocks Road, Creeping Hemlock Drive, Lakewood Drive, Silent Grove Court, Seir Hill Road and North Seir Hill Road.

In addition, significant views of the Project were identified:

1. from commercial areas along Main Avenue south of the Merritt Parkway northward from Linden Street and north of the Merritt Parkway looking south along Glover Avenue near the Metro-North train station; and

2. to and from the Norwalk River near Glover Avenue.

The study area, or Visual Impact Assessment Area (VIAA) consists of the Project Site and immediately adjacent neighborhoods. Affected viewer groups in these areas will primarily include residents, retail and office workers and motorists (Figure 2.1.1).

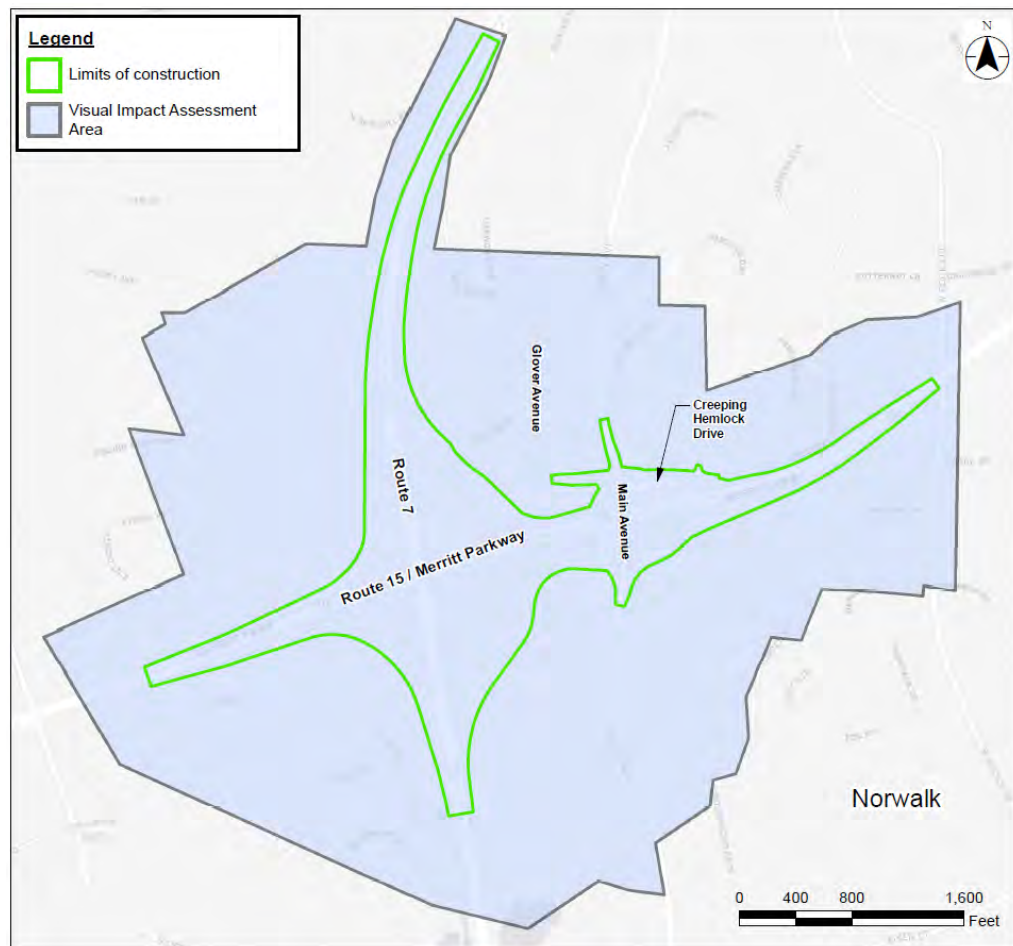


Figure 2.1.1 Visual Impact Assessment Area

Photo locations for the VIA were selected to represent historic, environmental, and neighborhood character resources, including:

- the Merritt Parkway;
- Historic bridges;
- Residential neighborhoods;
- Environmental settings, and;
- Community settings.

Keys to photo locations are provided in Figure 3.1 and Figure 3.2. Additional photos are provided in the Cultural Resources Assessment Appendix.

2.0 EXISTING CONDITIONS

2.1 VISUAL CHARACTER OF THE VIAA

The visual character of the VIAA is of a suburban/semi-rural nature with built-up commercial and retail zones, typical suburban residential neighborhood developments and semi-rural wooded areas that are older and less densely populated. The visual character exhibited by both the Merritt Parkway and Route 7 is of a limited access, multi-lane, high speed roadway located within a rolling, wooded landscape with occasional views to the surrounding context. The visual character specific to the Merritt Parkway, with its unique bridge architecture, horizontal and vertical alignment and programmed landscape views from the roadway, contribute to it being listed on the NRHP (Figure 2.1). Route 7 within the VIAA has the visual character typically associated with a limited access interstate highway (Figure 2.2). Substantial rock outcrops and changes of grade exist along Route 7 and within the cloverleaf ramps of the Merritt Parkway/Route 7 interchange (Figure 2.5).

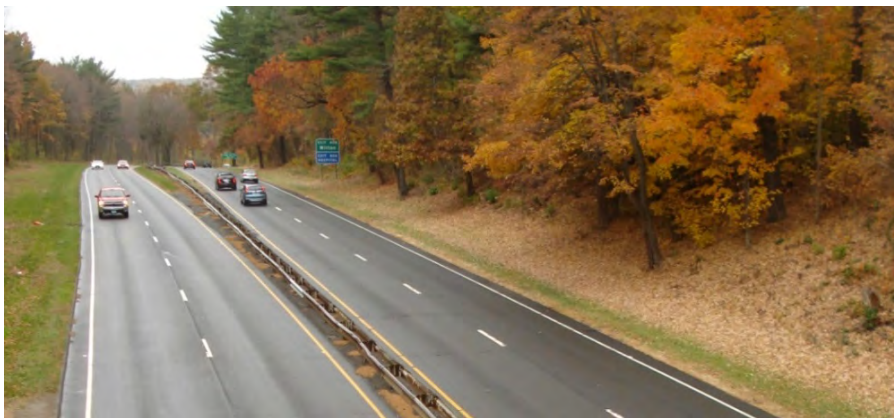


Figure 2.1 Typical Merritt Parkway Visual Character



Figure 2.2 Typical Route 7 Visual Character

2.2 VISUAL QUALITY OF VIAA

While the Merritt Parkway landscape context has been altered since its high point in the 1950s, the overall visual quality of the VIAA is still reasonably good with many of the noteworthy natural and man-made features that originally comprised the Parkway's character are still observed throughout. In various segments of the roadway, particularly where a program of safety improvement projects including the clearing of vegetation closest to the edge of pavement and other shoulder upgrades is being instituted, the Parkway's visual character is in transition. While these safety improvements have altered the Parkway's current visual quality, the landscape will rebound. Good general upkeep of facilities and properties is evident in certain areas, and maintenance appears to be performed fairly regularly.

2.3 VIEWER GROUPS AND VIEWER EXPOSURE

Four major viewer group types have been identified based on observations of land use and circulation patterns. While some of these viewer groups share similar if not identical views, the groups differ in their degree of sensitivity to the surrounding views due to the viewer's activity, awareness and duration of viewing time. These viewer groups include:

- Motorists on the Merritt Parkway and Route 7;
- Motorists on Local Streets;
- Residents and Pedestrians, and;
- Retail, Commercial and Office Workers and Customers.

Motorists on the Merritt Parkway and Route 7

With an annualized average volume of 85,900 vehicles using the north and southbound Merritt Parkway and 41,500 using the north and southbound Route 7 on a daily basis, motorists traveling through the project site make up the project's largest viewer group and have the greatest viewer exposure to the project's effects.

The area of the intersection of the Merritt Parkway and Route 7 occurs at the bottom of a dip in the Merritt Parkway's alignment (Figure 2.3).

Drivers heading north on the Parkway get their first glimpse of the overall VIAA and of the interchanges just after they crest the hill immediately east of the Exit 39A exit ramp gore area. Similarly, drivers travelling south on the Parkway get their initial view of the overall project and interchanges area as they round the curve in the Parkway west of the West Rocks Road overpass, east of Exit 40B for Route 7 North, Creeping Hemlock Drive and Main Avenue.



Figure 2.3 Merritt Parkway East of Main Avenue Interchange

Drivers travelling northbound on Route 7 first see the overpass that carries the Merritt Parkway over Route 7 from the area near the Exit 3 ramp gore that takes northbound Route 7 motorists to the Merritt Parkway southbound.

Drivers travelling southbound on Route 7 first see the overpass that carries the Merritt Parkway over Route 7 from a location just north of the Exit 3 ramp gore that takes southbound Route 7 motorists to the Merritt Parkway southbound. The duration of views for all motorists varies and depends on their speed of travel (Figure 2.4). A prominent component of the existing visual



Figure 2.4 Route 7 Looking South to Merritt Parkway Overpass

landscape is the existing Eversource overhead high-tension power lines that run parallel to Route 7 north of the Merritt Parkway then cross the Merritt Parkway in the vicinity of the current exit and entrance ramps between the Merritt Parkway northbound to Route 7 southbound and Route 7 southbound to the Merritt Parkway southbound (Figure 2.5).



Figure 2.5 Merritt Parkway Looking North to SB Route 7 Exit and Eversource Power Lines

Summary: Motorists on the Merritt Parkway and Route 7

Sensitivity Low to Medium

Duration of View Duration is a function of travel speeds and proximity of vegetation to the viewer. For example, at 50 MPH, a view $\frac{1}{4}$ mile away would be seen for 18 seconds

Motorists on Local Streets

There are two distinct types of local streets within the VIAA:

- Main Avenue, which is a minor urban arterial road that carries 13,200 vehicles daily north of the Merritt Parkway Interchange and 20,900 vehicles daily south of the Merritt Parkway interchange, and;
- local streets in the surrounding residential neighborhoods immediately adjacent to the project.

In either case, motorists traveling the local streets can view the Merritt Parkway and Route 7 as major visual elements within the landscape depending on their specific location. Again, the duration of views for all motorists varies and depends on their location, speed of travel, the narrowness or openness of the view and whether the viewer is actively engaged with the surrounding landscape or if the landscape is only a passing visual backdrop to other activities.

Summary: Motorists on Local Streets

Sensitivity Medium to High

Duration of View Medium, varies with viewshed limits and travel speeds

Residents and Pedestrians

Residents are the most sensitive to changes in their personal environment. The density of the neighborhood, the amount of space between the buildings, the height of the surrounding buildings, the presence or absence of mature trees on private and public property, the distance as well as the elevation of their property relative to the project site all affect their views to the surrounding landscape. The degree of visual sensitivity to negative changes increases with proximity to the Project and with the transparency of the views of the project's features.

Pedestrians within the VIAA experience essentially similar views as residents. The views exist in the same neighborhoods though they are sometimes experienced while moving as their point-of-view varies.

Summary: Residents

Sensitivity	High
Duration of View	Long

Summary: Pedestrians

Sensitivity	Medium to High
Duration of View	Short to Medium

Commercial and Office Workers and Customers

The view sensitivity for Commercial and Office Workers and Customers varies depending on their specific view location and duration. Sites closer to the project site may have a view of the existing highways while sites farther currently do not. Commercial and office workers generally come to the same location on a daily basis and may use either the Merritt Parkway or Route 7 for a portion of their trip. Once inside their place of work, their awareness of either the Merritt Parkway or Route 7 may be limited to an occasional view out a window or brief moments outside. Retail customers may be aware of either roadway as a component in the background that they may have seen while traveling to the shopping destination on one of the local streets mentioned above. Their attention is usually focused on the task at hand and they may be only marginally aware of the landscape beyond.

Summary: Commercial and Office Workers and Customers

Sensitivity	Medium to Low
Duration of View	Medium to Short

2.4 VISUAL ENVIRONMENT OF LANDSCAPE UNITS

FHWA guidelines [1] defines Landscape Units as, “Defined areas within the [Area of Visual Effect] that have similar visual features and homogeneous visual character and frequently, a single viewshed. An ‘outdoor room.’ Typically, the spatial unit used for assessing visual impacts.” This VIA identifies three landscape units:

- Motorists on the roadways and the immediate spaces flanking the Merritt Parkway or Route 7;
- Neighborhoods and Local Streets Immediately Surrounding the Project site; and
- Commercial and Retail Areas within the Project limits.

This section provides an analysis of each of the three landscape units, including for each unit:

- a general description of the unit;
- the viewer group(s) considered;
- the viewer’s perspectives (viewer position);
- the features viewed by each group, and;
- comments on the quality of the view.

Landscape Unit #1: Motorists on the Merritt Parkway or Route 7

Motorists traveling on either the Merritt Parkway or Route 7 experience mostly a limited-access highway situated within a rolling rural landscape. Vehicles on the Merritt Parkway are limited to passenger cars, noncommercial vehicles with combination plates and motorcycles only. Route 7 permits passenger cars, motorcycles, trucks and busses. Neither facility allows bicycles, tractors or pedestrians.

Perspective: All views are from inside a motor vehicle, either driving or observing as a passenger.

Features: The Merritt Parkway’s horizontal and vertical alignment, overpass structures and its programmed views and integration into its surrounding landscape are all contributing resources towards its listing on the NRHP. The roadway features and context of Route 7 is more typical of that seen on an interstate highway in the New England region.

View Quality: The view quality is mostly high for the Merritt Parkway as it enjoys a semi-rural setting and views from the road relate the facility to its context. Route 7 north of the Merritt Parkway enjoys a similar setting with flanking wooded areas and rock out crops. South of the Parkway, the visual character is more typical of an urban freeway. Whether north or south of the Merritt Parkway, the perceived scale of Route 7 with its larger footprint, is inherently larger than that of the Merritt. Even with many similarly shared roadway elements, Route 7 appears similar to an interstate with its wider lanes, shoulders and curves. The Merritt Parkway, even in the recently “improved” areas, still retains much more of its original cars-only parkway feel. (Figure 2.6, Figure 2.7 and Figure 2.8).



Figure 2.6 Merritt Parkway Looking North to Exist 39B for Main Avenue



Figure 2.7 Route 7 Looking South to Exit for Merritt Parkway South



Figure 2.8 Route 7 Looking South to Bridge over Perry Avenue

Landscape Unit #2: Neighborhoods and Local Streets Immediately Surrounding the Project Site

The neighborhoods and features that immediately surround the project site include the Silvermine neighborhood, which is located on both the north and south sides of the Merritt Parkway west of Route 7. Other local streets in the immediately project surroundings include the following: Indian Hill Road, Perry Avenue, Rae Lane, April Lane, Linden Heights, Skyview Lane, West Rocks Road, Creeping Hemlock Drive, Lakewood Drive, Silent Grove Court and North Seir Hill Road. All are generally in suburban residential neighborhoods with mostly low-scale buildings with the exception of the newly constructed five-story apartment building situated between the southbound Merritt Parkway, the Norwalk River, the Metro-North track and Glover Avenue (see Figure 2.9).



Figure 2.9 Merritt Parkway Looking South; Glover Avenue Apartment Building on Right

Viewer Groups: Residents and Pedestrians, Motorists on Local Streets

Perspective: Residents and pedestrians and motorists on local streets within the areas immediately surrounding the project site have a variety of views of the existing Merritt Parkway and/or Route 7 depending on location, distance to the roadways, neighborhood density, vegetation and topography. Residents on North Seir Hill Road have fleeting glimpses of Route 7 while areas of Perry Avenue south of April Lane have more sustained views of Route 7.

Residents and motorists on Perry Avenue have views of the structure that carries the Merritt Parkway and associated on- and off-ramps over Perry Avenue. The aesthetic treatment of the historic mainline Merritt Parkway bridge over Perry Avenue is typical of the historic structures of the Merritt Parkway while the two flanking ramp structures exhibit none of the distinctive architectural detailing seen on the mainline span.

The mainline structure is a rigid frame concrete bridge and the two flanking ramp structures are stub abutment precast concrete single span girder-type structures from a much more recent period of bridge design. Because the original Merritt Parkway mainline structure is between the two newer bridges and with all three at about the same elevation, viewers can only see the middle structure when they are much closer to it. The parallel ramps obstruct approach views of the entire Merritt Parkway bridge elevation in both directions on Perry Avenue. The two outer ramp structures are much more visible in the landscape from a farther distance and for a longer duration (see Figure 2.10).



Figure 2.10 Merritt Parkway Mainline Bridge between Ramp Structures over Perry Avenue

Residents and motorists on Perry Avenue also have views of the overpass structure that carries Route 7 over Perry Avenue. The mainline Route 7 structure is a stub abutment precast concrete single span girder-type structure similar to the two structures that carry the Merritt Parkway ramps over Perry Avenue that exhibit an aesthetic from a much more recent period of bridge design (see Figure 2.11).



Figure 2.11 Route 7 Bridge over Perry Avenue

Several residential properties on Rae Lane have backyards with views of the northbound mainline and Exit 39A ramp of the Merritt Parkway. A vegetative buffer of 50 to 150 feet exists between the properties and the Parkway's edge of pavement and filtered views of the roadway's light poles and signage are present (Figure 2.12).



Figure 2.12 Merritt Parkway - Filtered Views from Rae Lane Residential Backyards

Residents in the Linden Heights and Skyview Lane neighborhood have very limited views of the Merritt Parkway, for the most part only from the backyards of a limited number of homes on those streets. The homes are at a higher elevation than the Parkway and are separated from

the Parkway by a substantial vegetative buffer. There are no views of the Merritt Parkway from either of the actual streets.

Residents and pedestrians and motorists on West Rocks Road have only a very limited view of the Merritt Parkway until almost on the overpass of West Rocks Road over the Merritt Parkway. The buffering vegetation that exists right up to the overpass filters most views of the Parkway. There is a sidewalk on the west side of the West Rocks Road overpass where pedestrians and bicyclists can observe the Parkway for as long as they wish, although typical overpass chain link bridge fencing on the parapet somewhat obscures the view of the Parkway. A view of the overpass's architectural detailing is not available from this perspective (Figure 2.13).



Figure 2.13 West Rocks Road View of Merritt Parkway, looking North

Residents and pedestrians and motorists on Creeping Hemlock Drive, Lakewood Drive and Silent Grove Court have filtered views of the Merritt Parkway from both their homes and from the streets. Creeping Hemlock Drive in particular is at roughly the same vertical elevation as the Parkway and is in close horizontal proximity to the southbound lanes of the Merritt where the buffering vegetation, primarily deciduous, between the local street and the Parkway at its narrowest is only approximately 50 feet (see Figure 2.14 and Figure 2.15).



Figure 2.14 Creeping Hemlock Drive, view south to Merritt Parkway



Figure 2.15 Lakewood Drive View South to Creeping Hemlock Drive and Merritt Parkway

Several multi-unit residential buildings located off North Seir Hill Road are on an elevated site that can overlook sections of Route 7.

Features: Features in this district include single and multi-family dwellings on tree-lined suburban streets and semi-rural roads that wind through wooded areas.

View Quality: The view quality from the neighborhoods immediately surrounding the project site is generally high. Views of the Merritt Parkway and Route 7, when seen, reduce the visual quality somewhat. Views in wintertime, after deciduous trees drop their leaves, are somewhat more pronounced.

Viewer Group: Motorists on Local Non-Residential Streets

Perspective: Motorists along Main Avenue heading north or south have views of the Merritt Parkway mainline directly in front of them.

Features: On this four-lane local arterial roadway, motorists are surrounded primarily by a commercial shopping strip with businesses on both sides. Motorists on Main Avenue have direct views of the historic Merritt Parkway mainline bridge over Main Avenue which is the primary visual resource in this district (Figure 2.16 and Figure 2.17).

View Quality: Except for the view of the historic Merritt Parkway mainline bridge over Main Avenue, the overall visual quality in this area is unremarkable.



Figure 2.16 Main Avenue Looking North to Merritt Parkway Mainline Bridge



Figure 2.17 Main Avenue Looking North to Merritt Parkway Mainline Bridge

Landscape Unit #3: Commercial and Retail Areas Within the Project Limits

Both Main Avenue and Glover Avenue have major retail and commercial buildings present as well as several larger residential buildings. The retail shopping district along Main Avenue south of the Merritt Parkway is a local and regional destination with food, restaurant, banking, fitness, automotive services and hard goods stores located there. Typically, users arrive by car and park in parking lots in front of the stores. There are several stand-alone single business buildings as well as several groupings of buildings that have multiple stores in each. Several commercial office buildings are also located within this corridor (Figure 2.18).



Figure 2.18 Main Avenue, Looking North toward Merritt Parkway

North of the Merritt Parkway, there are primarily entrances to the commercial buildings that also front Glover Avenue and several hotel properties. With the exception of a gas station, no

retail establishments are present (Figure 2.19). The visual character is less developed.



Figure 2.19 Main Avenue North of Merritt Parkway; Looking South

The commercial corridor along Glover Avenue consists of a series of eight to twelve-story commercial office buildings along the east side of the street and a series of low, one and two-story commercial buildings with higher commercial buildings along the west side of the street. Glover Avenue is also the location where the Metro-North New Haven Line's Danbury Branch railroad track crosses under the Merritt Parkway and Glover Avenue. It is also the location of the Merritt 7 train station parking lot and low-level platform (Figure 2.20).



Figure 2.20 Glover Avenue Looking North toward Metro-North Merritt 7 Train Station

The historic Glover Avenue bridge over the Norwalk River is a visual resource within this district as is the view from Glover Avenue of the Merritt Parkway mainline bridges over the Norwalk River and the Metro-North track (Figure 2.21, Figure 2.17 and Figure 2.23).



Figure 2.21 Glover Avenue Bridge over the Norwalk River, Looking toward Main Avenue



Figure 2.22 Merritt Parkway Mainline Bridge over Norwalk River, Viewed from Glover Avenue Bridge



Figure 2.23 Merritt Parkway Mainline Bridge over Danbury Branch Metro-North Track, Viewed from Glover Avenue

Perspective: Points of view vary by location and distance from and height above the Merritt Parkway or Route 7 and depend on whether the viewer is indoors or outdoors. Views by office workers from upper floors can be sustained and similar to the experience a resident may have from their home. The visual experience of most retail users is mostly fleeting and secondary to other objectives.

Features: Depending on what floor the observer is on, the contextual features in closer proximity to the observer are usually of more interest and importance to the viewer than the project site in the distance.

View Quality: The quality of the views in this district is very mixed due to the commercial and retail nature of the area. The most notable visual resources in this district are the series of similarly styled white, eight to twelve-story office buildings that line the east side of Glover Avenue and the historic Merritt Parkway. Due to the varying building heights and the large footprints of the commercial buildings, views of the neighboring office buildings and rooftops generally detract from the overall visual experience of the district.

3.0 POTENTIAL VISUAL IMPACTS

3.1 ALTERNATIVES

Introduction

Through the Alternatives Selection process, in addition to the No-Build Alternative, two build alternatives, Alternative 21D and Alternative 26, have been identified as sufficiently viable to move forward for further analysis.

Under the No-Build Alternative, the Project would not be constructed and potential Project-related impacts to view quality within the VIAA would not occur. Of note, while the Merritt Parkway landscape context has been altered since its high point in the 1950s, the overall visibility of several of the noteworthy natural and man-made features that originally comprised the Parkway's character are still intact and contributing to the visual character of the Parkway. Good general upkeep of facilities and properties is evident in certain areas, and maintenance appears to be performed fairly regularly. Various segments of the roadway safety improvement projects include the clearing of vegetation closest to the edge of pavement and shoulder upgrades. While these safety improvements have altered the Parkway's current visual quality, the safety improvement program also includes a program of restoring the landscaping to its pre-construction conditions.

However, it is noted that the existing visual environment of the Parkway which constitutes the No-Build Alternative includes views that have been altered since the Parkway was originally conceived and executed. Many important viewsheds that were part of the Parkway's original visual character have changed since the roadway's creation. For example, within the VIAA, the addition of the Merritt View office building and the One Glover Apartments residential building into the immediate landscape of the Parkway have altered and degraded the visual character of the road from its original conception. Under the No-Build Alternative, Project-related mitigation to enhance the landscape and scenic resources would not be necessary.

The two build alternatives are described below.

Alternative 21D

Alternative 21D proposes completing the partial interchange (Interchange 39, 40) with traffic movements between Route 7, the Merritt Parkway, and Main Avenue. The existing Route 7/Merritt Parkway loop ramps would be retained in the easterly quadrants and the direct connections in the westerly quadrants. The four remaining Route 7/Merritt Parkway interchange movements would be achieved with semi-direct connections involving ten new bridges. Several towers of a power line may require relocation.

The location and configuration of the Merritt Parkway interchange with Main Avenue would enable connections between Main Avenue and Route 7 while efficiently accommodating traffic volumes there. The four tight-loop ramps would be eliminated or improved. Elimination of the existing ramps in the southwest quadrant of the Main Avenue interchange would allow for a long eastbound weaving lane between an eastbound Route 7 entry ramp and an improved exit loop ramp in the southeast quadrant of the Route 7 interchange.

In the westbound direction, the tight Merritt Parkway exit loop ramp in the northwest quadrant (to southbound Main Avenue) would be eliminated. Longer Merritt Parkway ramp acceleration and deceleration lanes would also be provided. The westbound entrance ramp would be built between a recently constructed residential apartment building and the Merritt Parkway. As currently conceived, the new ramps would be at or below the level of the Merritt Parkway. The dual historic Merritt Parkway bridges over Main Avenue would be replaced and the roadway widened. A wider Main Avenue would enable left-turn movements and wider sidewalks. Three closely spaced signalized intersections would be provided along Main Avenue. Glover Avenue would be widened, and a replacement bridge provided over the Norwalk River. Creeping Hemlock Drive would be shifted to the north and widened.

Alternative 26

Alternative 26 proposes completing the partial interchange (Interchange 39, 40) with traffic movements between Route 7, the Merritt Parkway, and Main Avenue.

This concept introduces two signalized intersections along Route 7 to complete the partial interchange, and a reclassification of Route 7 from a freeway to a lesser, lower speed classification. A modified diamond interchange with the Merritt Parkway is proposed and retains the existing loop ramp in the northeast quadrant and the existing direct connector ramp in the southwest quadrant to optimize traffic operations at the two signalized intersections.

The loop ramp in the northeast quadrant would be reduced in size from the larger existing one, a change made possible by slower speeds on the reclassified Route 7 from a freeway to a signalized arterial. Three northbound and three southbound lanes would be necessary at the signalized Route 7/ramp intersections, with turn lanes at each Route 7 intersection approach. Unlike Alternative 21D, no powerline tower relocations are required for Alternative 26.

The location and configuration of the Merritt Parkway interchange with Main Avenue would enable connections between Main Avenue and Route 7 while efficiently accommodating traffic volumes there. Three closely spaced signalized intersections would be provided along Main Avenue. The four tight-loop ramps would be eliminated or improved. Elimination of the existing ramps in the southwest quadrant would allow for a long eastbound weaving lane between an eastbound Route 7 entry ramp and an improved exit loop in the southeast quadrant. Except for several specific variations, the conditions at Main Avenue proposed for

both Alternative 21D and Alternative 26 are largely similar.

In the westbound direction, the tight Merritt Parkway exit loop ramp in the northwest quadrant would be eliminated. To avoid further weaving on the westbound Merritt Parkway for the southbound Main Avenue movement, an independent ramp would be located between the westbound weaving lane and the new residential building to the north.

3.2 POTENTIAL VISUAL IMPACTS

3.2.1 Introduction

Once Project Alternatives have been set, an analysis that would identify any potential visual impacts that an alternative may have on any viewer group is necessary. It is assumed that the No-Build will generate no new visual impacts as it is the existing visual condition. An analysis of potential visual impacts for Alternatives 21D and 26 follows:

3.2.2 Potential Visual Impacts of Individual Project Alternatives on Viewer Groups

The potential for a visual impact by the project on a particular viewer group is dependent upon the alternative's location compared to the existing visual condition and the new elements being proposed, the materials and construction type proposed, and any site improvement elements included with the final project. Of particular concern for potential impact is the proximity of any new roadway facilities to any viewer group with a high sensitivity to visual changes from the existing condition (Residents, Pedestrians and Motorists) and any new element introduced that has a direct correlation to an historic resource's contributing characteristic(s).

3.2.3 Potential Impacts of Project on Viewpoints from within the Landscape Units

For each Build Alternative, sixteen viewpoints have been identified (Figure 3.2 through Figure 3.1) as important points-of-view from where potential changes to the existing visual conditions should be evaluated. These viewpoints represent the most critical views for the various viewer groups. The potential impacts of the project upon viewers from within the three Landscape Units and the sixteen selected viewpoints are anticipated to vary with sensitivity to the view and the extent that the view would be modified. Included in this section are illustrations which depict the effects of the project on each viewpoint. These renderings, combined with the technical documentation in the Environmental Assessment, provide the basis for determining the potential visual impact on each viewpoint.

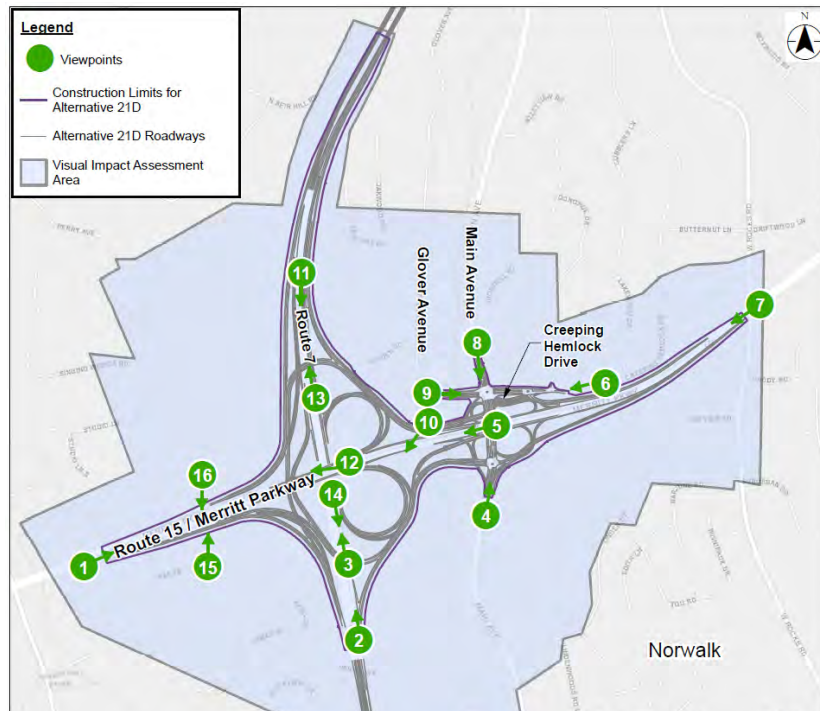


Figure 3.2 Visual Impact Assessment Viewpoint Locations - Alternative 21D

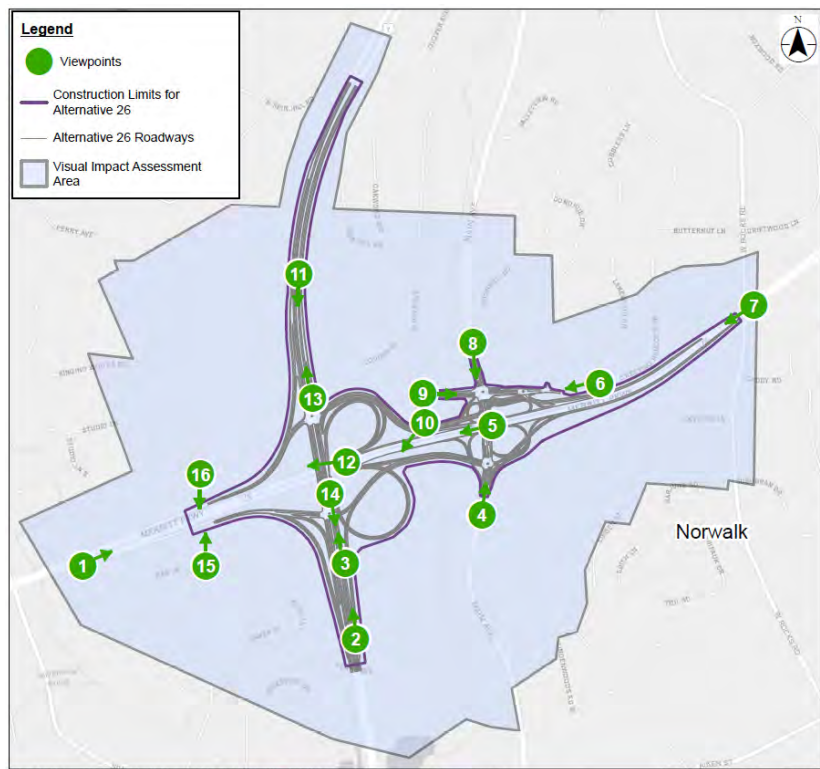


Figure 3.1 Visual Impact Assessment Viewpoint Locations – Alternative 26

Potential Impacts By Viewpoint

The following section first describes the potential view for each of the build alternatives from each viewpoint location. It will then describe any potential visual impact caused by that alternative at that location for each of the view groups previously described above.

Viewpoint #1 – View Looking Northbound on the Merritt Parkway

Alternative 21D

Viewers at Viewpoint #1 will see a widened, two-lane northbound exit ramp that takes motorists to either Route 7 southbound or a new intersection at Main Avenue. The widened ramp will require removal of vegetation along the roadside and will require more pavement than what currently exists. The bridge for the new ramp over Perry Avenue will be wider than the existing bridge so the view of the bridge's parapet will be altered from what's there today.

Alternative 26

Viewers at Viewpoint #1 will see a single-lane exit ramp similar to what in there now that takes motorists to a new intersection of an at-grade Route 7 urban arterial roadway. The ramp will use the same pavement as what currently exists. The bridge for the ramp over Perry Avenue will be not be changed.

Impacts By Viewer Groups

- Motorists on the Merritt Parkway and Route 7 – For travelers on the Merritt Parkway mainline, the visual environment changes caused by the additional pavement for the widened bridge over Perry Avenue for the northbound exit ramp of Alternative 21D will be noticeable when compared to the original visual character of the Parkway. This can be construed as a negative visual impact. In contrast, under Alternative 26 the existing number of lanes and bridges will remain unchanged. As a consequence, this Alternative will not result in visual impacts to this viewer group at this viewpoint.
- Motorists on Local Streets – Motorists on local streets will not have a view from this viewpoint on the Merritt Parkway.
- Residents and Pedestrians – With Alternative 21D, several residential properties on Rae Lane will have a new northbound exit ramp off the Merritt Parkway one lane closer to their property lines. This proposed new exit ramp location however would not impinge on or substantially decrease the existing vegetative buffer that currently exists between the residences and the Merritt Parkway. There would be no change in views with Alternative 26.

- Commercial and Office Workers and Customers – This viewer group will not have a view of the Parkway in this location.



Figure 3.3 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Existing View



Figure 3.4 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.5 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #2 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #2 will see the additional pavement of a widened exit ramp to Main Avenue on the northbound side of Route 7 accomplished by the cutting back of the existing rock outcrop west of Route 7, and a realigned entrance ramp from the Merritt Parkway to Route 7 southbound. Figuring most prominently in this viewpoint is the new fly-over bridge over Route 7 where there currently is no bridge that connects Route 7 southbound to the Merritt Parkway northbound.

Alternative 26

Viewers at Viewpoint #2 will have views of an at-grade four lane urban arterial roadway in place of the freeway section that currently exists at that location today, and will see the additional pavement of a widened exit ramp to Main Avenue on the northbound side of Route 7. Both the existing southbound entrance ramp from the northbound Merritt Parkway to the southbound

Route 7 and the exit ramp from the northbound Route 7 to the northbound Merritt Parkway have been removed and the area where there was pavement has been landscaped.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – For Alternative 21D, motorists on northbound Route 7 will have a dramatically different view compared with current conditions. The existing rock outcrops will be cut even further back, with more ramp pavement and the new bridge in their view space. Therefore, the visual character of Route 7 will have an increased “interstate highway”-like appearance than what is currently seen. Given that the visual character of Route 7 is currently one of an interstate highway, the proposed changes would not be considered substantially different from existing conditions and therefore it would not result in a negative visual impact.

For completely different reasons, Alternative 26 will afford northbound Route 7 motorists a dramatically different view from what’s existing as well. In place of the current interstate highway-look that’s there today, this Alternative would result in a more modest transportation facility in the form of an at-grade urban arterial roadway. With no change to the rock outcrops at this location and landscaping will be seen. With this alternative, the proposed changes could be considered a positive visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of Route 7 in this location.



Figure 3.6 Viewpoint #2 – View Looking North on Route 7 – Existing View



Figure 3.7 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 21D



Figure 3.8 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 26

Viewpoint #3 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #3 under this Alternative will be under a new fly-over bridge over Route 7 that connects Route 7 southbound to the Merritt Parkway northbound. A substantial amount of the existing rock outcrop on the western side of Route 7 will be removed to install the new ramp. The existing loop entrance ramp from the northbound Merritt Parkway to northbound Route 7 will be on a slightly new alignment nearly in the same location as is currently

Alternative 26

Viewers at Viewpoint #3 under Alternative 26 will be looking at a new, fully signalized, at-grade intersection on the new Route 7 four-lane urban arterial roadway. A new exit ramp from northbound Merritt Parkway and an entrance ramp to the eastbound Merritt Parkway replace the two freeway-style ramps that make these same connections. A substantial amount of the existing rock outcrop on the western side of Route 7 will be removed to install the new ramp. There will also be a new entrance ramp from northbound Route 7 to the northbound Merritt Parkway. The areas where ramps removed will be landscaped.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 - For Alternative 21D, motorists on northbound Route 7 will have a new bridge in their view space but otherwise, the views and visual character of Route 7 from this point-of-view could not be considered a negative visual impact as the existing visual character of Route 7 is one of an "interstate highway"-like appearance remains essentially unchanged.

Alternative 26 will afford northbound Route 7 motorists a markedly different view from the existing view, but for very different reasons than those described above. In place of the current interstate highway-look that's there today, a much more modestly scaled transportation facility of an at-grade urban arterial roadway would be constructed. To implement this alternative however, substantial alterations to the existing rock crops would be necessary which would then have an overall negative visual impact to the area.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of Route 7 in this location.



Figure 3.9 Viewpoint #3 – View Looking North on Route 7 – Existing View



Figure 3.10 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 21D



Figure 3.11 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 26

Viewpoint #4 – View Looking North on Main Avenue

Alternative 21D

Viewers at Viewpoint #4 will see at a new, fully signalized, at-grade intersection on Main Avenue that accommodates connections from northbound Route 7 to Main Avenue and the Main Avenue entrance onto northbound Merritt Parkway. The areas where ramps were removed will be landscaped. The biggest visual change from the existing condition is that Main Avenue will be widened in this area to five lanes plus north and southbound bike paths and a sidewalk on each side. To do this, the Merritt Parkway mainline bridge over Main Avenue will be replaced with a new structure. The existing Main Avenue bridge is a single arch, rigid frame structure with a masonry veneer of rounded stones in a random pattern and granite voussoir stones that outline the arch's intrados opening. The Main Avenue bridge is a contributing resource element to the Merritt Parkway's listing on the NRHP.

Alternative 26

Viewers at Viewpoint #4 will have a similar change to the visual environment as Alternative 21D. Viewers here will see a new fully signalized, at-grade intersection on Main Avenue that will accommodate the connections from northbound Route 7 to Main Avenue and the entrance from Main Avenue onto northbound Merritt Parkway. The areas where ramps were removed will be landscaped. The biggest visual change from the existing condition is that Main Avenue will be widened in this area to five lanes plus north and southbound bike paths and a sidewalk on each side. To do this, the Merritt Parkway mainline bridge over Main Avenue will be

replaced with a new structure. The existing Main Avenue bridge is a single arch, rigid frame structure with a masonry veneer of rounded stones in a random pattern and granite voussoir stones that outline the arch's intrados opening. The Main Avenue bridge is a contributing resource element to the Merritt Parkway's listing on the NRHP.

Impacts By Viewer Group

- **Motorists on the Merritt Parkway and Route 7** – For both alternatives, motorists on the Merritt Parkway would have only a fleeting and tangential view of a widened Main Avenue resulting in no significant visual impact. Main Avenue is not visible from Route 7.
- **Motorists on Local Streets** – The proposed changes to both Main Avenue and the Merritt Parkway bridge over Main Avenue for both Alternative 21D and Alternative 26 will be visually dramatic. Main Avenue will be widened with an increased number of travel lanes along with new traffic signals, bike paths and sidewalks that will alter the character of how the street appears and how it functions when compared to today. This will be perceived as a negative visual impact.

For both alternatives, the removal and replacement of the Merritt Parkway bridge over Main Avenue will be a significant negative visual impact as the existing structure is a contributing resource to the Merritt Parkway NRHP historic district. While the existing condition is somewhat cluttered visually, the current landscape is significantly diminished in visual quality with an existing CTDOT staging area flanking the southeast edge of the Main Avenue bridge. Both alternatives will improve this condition.

- **Residents and Pedestrians** – The visual impact of both alternatives as described for motorists (above) would be the same but more pronounced for this viewer group as pedestrians in this area would have a view of the changed visual environment for a longer duration and their sensitivity is greater. The addition of sidewalks and bike lanes will be an overall improvement to the visual and physical character of this area. There are no residents at this point-of-view.
- **Commercial and Office Workers and Customers** – Similar to the visual impacts described for pedestrians (above), Commercial and Office Workers and Customers will experience comparable visual changes but with a lower sensitivity as their primary foci would be elsewhere. When these viewers do observe their exterior visual environment, the changes to landscape would be readily seen and could be construed as a minor positive impact to the existing view.



Figure 3.12 Viewpoint #4 – View Looking North on Main Avenue – Existing View



Figure 3.13 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 21D



Figure 3.14 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 26

Viewpoint #5 – View Looking South on the Merritt Parkway

Alternative 21D

Viewers at Viewpoint #5 will see a much wider Merritt Parkway section as it crosses Main Avenue than the four-lane roadway currently there. In addition to the two through lanes in each direction, adding to the width of the Parkway here will be a new on-ramp connection to the northbound Merritt Parkway from Route 7 northbound and the deceleration lane needed for a new ramp that connects southbound Merritt Parkway motorists to either northbound or southbound Route 7. The view of the bridge's parapet will be altered from what's there today. The width of the center median remains unchanged.

Alternative 26

Viewers at Viewpoint #5 will see a wider Parkway section here than existing, but it won't be as wide as proposed for Alternative 21D. While there will be a new deceleration lane necessary for a new ramp that connects southbound Merritt Parkway motorists to an at-grade arterial Route 7, there will be no new on-ramp connection to the northbound Merritt Parkway from Route 7 northbound. The view of the bridge's parapet will be altered from what's there today. As with 21D, the width of the center median remains unchanged.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – The additional pavement necessary for a widened Merritt Parkway mainline and the new bridge over Main Avenue will be a

negative visual impact for motorists on the Merritt Parkway. Any change to the median transforms the original parkway character negatively to more like a modern-day interstate. For both alternatives, the new bridge over Main Avenue may not have parapets like the original bridge thus denigrating the Parkway's historic visual quality.

Alternative 26 would involve construction of shorter ramps than those associated with Alternative 21D, and therefore would result in smaller visual impacts at this location. This area cannot be seen from Route 7.

- Motorists on Local Streets – Motorists on the adjacent local streets will have a sense of a larger Merritt Parkway but the views can only be from a distance and not significantly impactful.
- Residents and Pedestrians - This viewer group has no view of the Merritt Parkway in this location.
- Commercial and Office Workers and Customers – This viewer group can only view the Parkway from a distance and their view of the roadway is peripheral and somewhat limited. When these viewers do observe their exterior visual environment, the changes to landscape could be construed as a minor positive impact to the existing view.



Figure 3.15 Viewpoint #5 – View Looking South on the Merritt Parkway – Existing View



Figure 3.16 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.17 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #6 – View Looking West on Creeping Hemlock Drive

Alternative 21D

Viewers at Viewpoint #6 will see a new alignment of Creeping Hemlock Road that will be straightened and widened from its current 2 lane configuration; one eastbound and one westbound, to a five-lane section with four lanes westbound and one lane eastbound. The new alignment cuts significantly into the rock outcrop on the north side of the street. The newly aligned Creeping Hemlock Road meets at a new, signalized T- intersection with Main Avenue and Glover Avenue. The exit ramp of the southbound Merritt Parkway to Creeping Hemlock Road will be realigned so that it is longer and located closer to Creeping Hemlock Road. Areas that were formerly ramp pavement will be landscaped.

Alternative 26

Viewers at Viewpoint #6 will see the same realignment of Creeping Hemlock Road that is included in Alternative 21D that is straightened and widened from its current 2 lane configuration; one eastbound and one westbound, to a five-lane section with four lanes westbound and one lane eastbound. The new alignment cuts significantly into the rock outcrop on the north side of the street. The newly aligned road meets at a new, signalized T- intersection with Main Avenue and Glover Avenue. The exit ramp of the southbound Merritt Parkway to Creeping Hemlock Road is realigned and will be longer and closer to Creeping Hemlock Road as well. Areas that were formerly ramp pavement will be landscaped along with opportunities for enhancing the buffers between the Parkway and the neighborhood.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – As this point-of view is off the Merritt Parkway's mainline on the periphery and can only be seen momentarily by motorists on the Merritt Parkway, the visual impact is not significant. This point-of-view is not available from Route 7.
- Motorists on Local Streets – The changes to the visual environment from either alternative would be dramatic and substantial. Where the existing road is a local, one-lane-in-each-direction and slightly curved street with the Parkway partially visible off to one side, the new road proposed in both alternatives would be five lanes wide, arrow-straight with significant rock removal required. The existing vegetated buffer between Creeping Hemlock Road and the Parkway would be eliminated thus exposing the neighborhood to unfiltered views of the mainline. These changes would be a negative impact to the visual feel of the neighborhood closest to the Parkway. The reestablishment of the existing buffer is possible.

- Residents and Pedestrians – The changes to the visual environment described for the local motorist (above) would only be intensified for this viewer group due to the longer exposure, closer proximity and heightened sensitivity.
- Commercial and Office Workers and Customers – There are no Commercial and Office Workers and Customers in this area.



Figure 3.18 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Existing View



Figure 3.19 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 21D



Figure 3.20 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 26

***Viewpoint #7 – View Looking South on the Merritt Parkway
Alternative 21D***

Viewers at Viewpoint #7 will see minor changes to the current visual character of the Merritt Parkway. Modifications to the righthand shoulder in advance of the realigned and lengthened exit ramp to Creeping Hollow Road and the merging of the northbound on-ramp from Main Avenue will cause the landscape buffers along outer limits of the Parkway to be pushed back along with some additional pavement for the ramps that will be required. The center median however will remain in its current configuration, and the Parkway's visual character will appear mostly but not totally unchanged.

Alternative 26

Viewers at Viewpoint #7 will see the same minor change to the current visual character of the Parkway as is seen with Alternative 21D. The same slight modifications described above will result in the Parkway's character generally remaining unchanged.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – This is the only viewer group with a view from this location. In comparison to the existing condition, the proposed alternatives will not result in views that are inconsistent with other safety improvements already being implemented along the length of the Parkway. As a consequence, impacts on views from this location would not be considered a negative.
- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of the Parkway in this location.

- Commercial and Office Workers and Customers - This viewer group has no view of the Parkway in this location.



Figure 3.21 Viewpoint #7 – View Looking South on the Merritt Parkway – Existing View



Figure 3.22 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.23 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #8 – View Looking South on Main Avenue

Alternative 21D

Viewers at Viewpoint #8 will see a similar five-lane roadway section for Main Avenue as what's there currently. The concrete sidewalk on the west side of the street north of Glover Avenue will be carried all the way south to the intersection with Glover Avenue and Creeping Hemlock Road. Farther beyond the intersection, viewers will begin to see in the distance the new wider bridge that carries the Merritt Parkway over Main Avenue.

Alternative 26

Viewers at Viewpoint #8 will have the same view from this viewpoint as what comprises Alternative 21D. It will be a similar five-lane roadway section for Main Avenue as what's there currently. The concrete sidewalk on the west side of the street north of Glover Avenue will be carried all the way south to the intersection with Glover Avenue and Creeping Hemlock Road. Farther beyond the intersection, viewers will begin to see in the distance the new wider bridge that carries the Merritt Parkway over Main Avenue.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – The change to the existing visual environment for this viewer group will be de minimis. as the view is fleeting and peripheral. This view is not available to travelers on Route 7.
- Motorists on Local Streets – While the intersection of Main Avenue, Glover Avenue and Creeping Hemlock Road will be new, the road and its confines will remain largely the same. New elements such as signals and light poles will add a more urban character to the area, but the overall visual impact will not be significant. There is an opportunity to place the existing overhead utility wires underground so as to improve the existing visual character of the area.
- Residents and Pedestrians – Pedestrians and cyclists in this area will experience an improved visual and physical environment with new sidewalks. Their visual impact could be considered be positive.
- Commercial and Office Workers and Customers – Views of the new intersection would only be available to patrons of the gas station and the donation center on the corners. The overall visual impact will be minor. Views from the higher floors of the surrounding office buildings would be considered an overall minor improvement.



Figure 3.24 Viewpoint #8 – View Looking South on Main Avenue – Existing View



Figure 3.25 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 21D



Figure 3.26 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 26

Viewpoint #9 – View Looking East on Glover Avenue

Alternative 21D

Viewers at Viewpoint #9 will see a new Glover Avenue bridge over the Norwalk River as Glover Avenue will be realigned towards the new Glover/Main/Creeping Hemlock intersection and will be widened from its current one lane in each direction to three lanes eastbound and one lane westbound. The new alignment will bring Glover Avenue closer to the One Glover Avenue Apartments building on the south side of the road. A new four-lane bridge will replace the existing twin arch masonry structure with a small sidewalk and pipe railing on each side built in 1912. The existing bridge is listed on the NRHP.

Alternative 26

Viewers at Viewpoint #9 will have the same new view along Glover Avenue as proposed in Alternative 21D. There will be a new Glover Avenue bridge over the Norwalk River as the road will be realigned towards the new Glover/Main/Creeping Hemlock intersection and will be widened from its current one lane in each direction to three lanes eastbound and one lane westbound. The new alignment will bring Glover Avenue closer to the One Glover Avenue Apartments building on the south side of the road. A new four-lane bridge will replace the existing twin arch masonry structure with a small sidewalk and pipe railing on each side built in 1912. The existing bridge is listed on the National Register of Historic Places.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Viewers on both of these roads will not be able to see the proposed changes to Glover Avenue in the area.
- Motorists on Local Streets – Where there was once a simple, two-lane, historic masonry arch structure over the Norwalk River, both alternatives propose a new and significantly wider structure. The visual impact of the replacement bridge on a new alignment will be quite noticeable and considered negative.
- Residents and Pedestrians – Located closer to the One Glover Avenue Apartments residential building on Glover Avenue, the new bridge proposed for both alternatives that replaces an historic structure will be a negative visual impact to this viewer group.
- Commercial and Office Workers and Customers – In this location, office workers in the Merritt On The River office building on Glover Avenue have the same visual environment as do residents, only with reduced sensitivity given the property use. Impacts from both proposed build alternatives would be the same for this group.



Figure 3.27 Viewpoint #9 – View Looking East on Glover Avenue – Existing View



Figure 3.28 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 21D



Figure 3.29 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 26

Viewpoint #10 – View Looking South From Glover Avenue

Alternative 21D

At the bend of Glover Avenue by the tracks of the Danbury Branch of Metro-North Railroad, viewers at Viewpoint #10 looking south will see a new bridge that carries Ramps ‘D’ and ‘WS’ over the railroad. This new bridge will be in the same location as the existing historic concrete twin barrel-arch that forms the Merritt Parkway mainline structure, and which will stay in place carrying the parkway over the railroad continuing to obscure the view of the existing mainline structure from this vantage point.

Alternative 26

Viewers at Viewpoint #10 will experience the same view as for Alternative 21D, including the new bridge that carries Ramps ‘D’ and ‘WS’ over the railroad.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 would have a limited views of this area, and only if substantial vegetation removal occurs.
- Motorists on Local Streets – As seen off to the side as one crosses the Metro-North tracks, the existing view of the historic Merritt Parkway mainline bridge over the Metro-North tracks will be completely blocked with the new ramp structure proposed in either

of the alternatives. This change to the visual environment is considered a negative impact.

- Residents and Pedestrians – The residents of units in the One Glover Avenue Apartments building that face the Merritt Parkway and pedestrians along Glover Avenue will be negatively impacted by the presence of the new ramp structure proposed in either of the alternatives.
- Commercial and Office Workers and Customers – Workers in the Merritt On The River office building on Glover Avenue will not be visually impacted by either alternative's new ramp in front of the existing Merritt Parkway bridge.



Figure 3.30 Viewpoint #10 – View Looking South From Glover Avenue – Existing View



Figure 3.31 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 21D



Figure 3.32 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 26

Viewpoint #11 – View Looking South on Route 7

Alternative 21D

Viewers at Viewpoint #11 will still have a view of a freeway-style roadway with two southbound and two northbound lanes plus shoulders. The new elements associated with this alternative include a lengthened exit Ramp 'SW' from southbound Route 7 to southbound Merritt Parkway, a new entrance Ramp 'WN' to northbound Route 7 from southbound Merritt Parkway and a new flyover bridge Ramp 'WS' between the viewer and the existing Merritt Parkway mainline that carries southbound Merritt Parkway traffic to southbound Route 7. The lengthened southbound exit ramp and the new northbound entrance ramp will require large areas of vegetation and rock to be removed. Areas that were once ramp pavement will be landscaped.

Alternative 26

Viewers at Viewpoint #11 will be looking at the at-grade signalized intersection of a five-lane (three southbound, two northbound) principle arterial roadway in place of the existing freeway-style roadway. The four-legged intersection handles movements to and from north and southbound Route, Ramp 'WS' from Main Avenue and the southbound Merritt Parkway and Ramp 'F' which is an on-ramp to the southbound Merritt Parkway.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – For Alternative 21D, viewers on Route 7 will experience a new highway configuration that has the same interstate highway feel as the existing. Extensive swaths of the existing landscape buffer on both sides will be removed and this will result in a negative visual impact. Overall, however, the visual environment will remain one of an interstate highway. Viewers on the Merritt Parkway will experience a momentary side view of Route 7 from the southbound Merritt Parkway mainline and their visual experience will remain essentially unchanged.

With Alternative 26, the change to the existing visual environment will be substantial as it will afford southbound Route 7 motorists a dramatically different view from what's existing. In place of the current interstate highway-look that's there today, a much more modestly scaled transportation facility of an at-grade urban arterial roadway would be constructed. There will be no reduction to the landscape buffers on either side of the corridor. The change to the visual environment with Alternative 26 can be considered a positive impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has a marginal view of Route 7 and any change to their visual environment is considered negligible.



Figure 3.33 View Looking South on Route 7 – Existing View



Figure 3.34 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 21D



Figure 3.35 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 26

Viewpoint #12 – View Looking South on the Merritt Parkway

Alternative 21D.

Viewers at Viewpoint #12 will experience several changes to the existing visual environment of the Merritt Parkway mainline. While the Merritt Parkway's alignment will remain basically the same, the cuts to the rock outcroppings on the north side of the Parkway needed to build Ramp 'SE' and Ramp 'WS' from southbound Route 7 will be substantial. The additional amount of pavement and the new parapets of the new and wider bridges that carry the mainline of the Merritt Parkway over these two new ramps will also be visible to Parkway users.

Alternative 26

Viewers at Viewpoint #12 will not see the same changes that motorists would in Alternative 21D. The Merritt Parkway mainline bridges over Route 7 will remain the same and because the ramps from Route 7 southbound to the Merritt Parkway westbound use the same basic alignment as what exists today, the rock removal needed for Alternative 21D will not be necessary for this alternative.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With the new and wider bridges over Main Avenue, the visual character of the Merritt Parkway in this location will be

diminished with Alternative 21D's proposed configuration. It will have less of a park-like feel and the impact to the visual character would be negative.

- Only slightly less wide than the new bridges over Main Avenue needed for Alternative 21D, the impact to the visual environment caused by the new bridges over Main Avenue in Alternative 26 are similar in that they will create a diminished parkway visual experience.
- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of the Merritt Parkway in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of the Merritt Parkway in this location.



Figure 3.36 Viewpoint #12 – View Looking South on the Merritt Parkway – Existing View



Figure 3.37 Viewpoint #12 – View Looking South on the Merritt Parkway –



Figure 3.38 Viewpoint #12 – View Looking South on the Merritt Parkway –

Viewpoint #13 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #13 will still have a view of a freeway-style roadway on Route 7 with two southbound and two northbound lanes plus shoulders and a northbound C-D road for the exit to the southbound Merritt Parkway. The new elements associated with this alternative include a lengthened exit Ramp 'SW' from southbound Route 7 to southbound Merritt Parkway and, most prominently, a new flyover bridge Ramp 'WS' that carries southbound Merritt Parkway traffic to southbound Route 7. A substantial amount of rock outcrop will be removed to construct new Ramp 'SE' that connects the southbound Route 7 to northbound Merritt Parkway.

Alternative 26

Viewers at Viewpoint #13 will be looking at the at-grade signalized intersection of a five-lane (three southbound, two northbound) principle arterial roadway in place of the existing freeway-style roadway. The four-legged intersection handle movements to and from north and southbound Route, Ramp 'WS' from Main Avenue and the westbound Merritt Parkway and Ramp 'F' which is an on-ramp to the westbound Merritt Parkway.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With Alternative 21D, the construction of the new flyover ramp 'WS' will add more highway elements to the overall interstate highway-look of Route 7, neither improving nor diminishing the highway's overall visual character. Since there is no visual resource that the new structure would visually obstruct, there is no visual impact though the view from the Merritt Parkway of a highway with a flyover ramp would further reduce the park-like context that users of the original Merritt enjoyed. The substantial amount of rock outcrop removal would cause a negative visual impact.

Alternative 26 will afford northbound Route 7 motorists a dramatically different view from what's existing. In place of the current interstate highway-look that's there today, the much more modestly scaled transportation facility of an at-grade urban arterial roadway with no change to the rock outcrops and landscaping will be seen. With this alternative, the proposed changes could be considered a positive visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers - This viewer group has no view of Route 7 in this location.



Figure 3.39 Viewpoint #13 – View Looking North on Route 7 – Existing View



Figure 3.40 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 21D



Figure 3.41 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 26

Viewpoint #14 – View Looking South on Route 7

Alternative 21D

Viewers at Viewpoint #14 will still have a view of a freeway-style roadway with two southbound and two northbound lanes plus shoulders and a northbound C-D road and entrance ramp from the eastbound Merritt Parkway to northbound Route 7. Also, in this view is the new flyover bridge carrying the connecting ramp “SE” from southbound Route 7 to the eastbound Merritt Parkway and the eastbound Merritt Parkway to Main Street. The existing large rock outcrops on the west side of Route 7 will remain in place.

Alternative 26

Viewers at Viewpoint #14 will be looking at an at-grade signalized intersection of a seven-lane (four southbound, three northbound) principle arterial roadway in place of the existing freeway-style roadway. A new four-legged intersection will handle movements to and from north and southbound Route 7, Ramp ‘A’ from the eastbound Merritt Parkway and Ramp ‘H’ which is an on-ramp to the eastbound Merritt Parkway. To construct this intersection at-grade, large amounts of the rock outcrop on the west side of Route 7 will be removed.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With Alternative 21D, the addition of a new flyover highway ramp only adds to the general interstate highway aesthetic already present on Route 7 and would further reduce the park-like context that users of the original Merritt enjoyed. Therefore, this alternative would result in impacts to the visual experience for viewers on either Route 7 or the Merritt Parkway.

With Alternative 26, the change from an interstate aesthetic to an at-grade urban arterial roadway would be considered a positive impact. However, because the amount of rock removal is large and it can be seen from both Route 7 and the Merritt Parkway, this must be considered a negative visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers - This viewer group has a marginal view of Route 7 and any change to their visual environment must be considered negligible.



Figure 3.42 Viewpoint #14 – View Looking South on Route 7 – Existing View



Figure 3.43 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 21D



Figure 3.44 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 26

Viewpoint #15 – View Looking North on Perry Avenue

Alternative 21D

Viewers at Viewpoint #15 will see a new bridge structure over Perry Avenue that will carry a widened exit ramp off the northbound Merritt Parkway, replacing an existing ramp structure in essentially the same location. Both the existing ramp and the new ramp are located directly in front of the original Merritt Parkway Perry Avenue overpass and they already have had a significant visual impact on the historic resource's integrity of setting.

Alternative 26

Viewers at Viewpoint #15 will not experience a change in visual character as the existing ramp structure over Perry Avenue will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Avenue overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 will have no view of either of the proposed alternatives from this point-of-view.
- Motorists on Local Streets – For either of the Alternatives, the circa 1990 concrete steel-girder bridge in front of the historic Merritt Parkway bridge over Perry Avenue

(on both sides of Merritt Parkway main line; see View #16) has already had a significant visual impact on the historic bridge's integrity of setting. Alternative 21D's new ramp structure would not directly impact the bridge or further affect the historic bridge's already compromised setting.

- Residents and Pedestrians – The visual impact for this viewer group will be the same as that described for Motorists on Local Streets (above).
- Commercial and Office Workers and Customers - This viewer group has no view of the Merritt Parkway ramp bridge over Perry Avenue.



Figure 3.45 Viewpoint #15 – View Looking North on Perry Avenue – Existing View



Figure 3.46 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 21D



Figure 3.47 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 26

Viewpoint #16 – View Looking South on Perry Avenue

Alternative 21D

Viewers at Viewpoint #16 will not experience a change in visual character as the existing ramp structure over Perry Street will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Avenue overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Alternative 26

Viewers at Viewpoint #16 will not experience a change in visual character as the existing ramp structure over Perry Street will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Street overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 will have no view of either of the proposed alternatives from this point-of-view.
- Motorists on Local Streets – For either alternative, there is no change in the visual environment and no visual impact.

- Residents and Pedestrians – For either alternative, there is no change in the visual environment and no visual impact.
- Commercial and Office Workers and Customers - This viewer group has no view of the Merritt Parkway ramp bridge over Perry Avenue.



Figure 3.48 Viewpoint #16 – View Looking South on Perry Avenue – Existing View



Figure 3.49 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 21D



Figure 3.50 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 26

Summary of Alternatives and Visual Impacts

Two build alternatives, 21D and 26, plus a no-build alternative were analyzed for their visual impact to the VIAA. The no-build alternative maintains the existing visual context and is included for baseline comparative purposes only.

Both build alternatives widen Main Avenue to provide turning lanes and improved bicycle and pedestrian facilities on Main Avenue and therefore, both build alternatives include the full replacement of both Merritt Parkway mainline structures over Main Avenue. Both build alternatives also include the replacement of the Glover Avenue bridge over the Norwalk River along with the realignment of Creeping Hemlock Drive thus necessitating substantial rock cut back.

Alternative 21D can be considered the more “built out” of the two alternatives as it includes a new fly-over bridge over Route 7 that requires substantial rock cuts that Alternative 26 does not have along with all new connecting ramps to facilitate all the required movements between the Merritt Parkway, Route 7 and Main Avenue in a traditional highway interchange configuration. Alternatively, Alternative 26 takes a less typical “highway design improvement” approach to making these connections with the conversion of Route 7 from a typical high-speed interstate highway configuration with standard acceleration and deceleration loop ramps to an at-grade urban arterial with intersections and traffic signals.

In the most general terms, Alternative 21D imparts more overall noticeable visual impact on the VIAA than Alternative 26 as it includes more constructed features that add to the overall “highway” feel of the VIAA. While both build alternatives impart various visual impacts in certain areas, some in common with each other, Alternative 26 has fewer ramps and bridges than Alternative 21D so the cumulative visual impact to the VIAA can be considered lower than that of Alternative 21D.

4.0 MITIGATION MEASURES

Section 3.0 identified and described the level of potential visual impacts that may be caused by either of the two proposed project build alternatives. It is the purpose of this section to identify and recommend potential mitigation measures for identified negative visual impacts as identified in Section 3.0.

As prescribed in the FHWA’s Guidelines for Visual Impact Assessments, mitigation measures will be required in instances where negative impacts have been identified for various viewsheds and viewer groups. Mitigation measures will be necessary to address impacts that are determined to occur once one has analyzed a potential proposed view with the finishes and treatments developed as part of and included in the proposed future build condition are included in the evaluation.

As prescribed in the FHWA's *Guidelines for Visual Impact Assessments*, mitigation measures will be required in instances where negative impacts have been identified for various viewsheds and viewer groups. Mitigation measures will be necessary to address impacts that are still determined to occur once one has analyzed a potential proposed view with the finishes and treatments developed as part of and included in the proposed future build condition are included in the evaluation. Finishes and treatments that could be included as a component of the proposed design might include replacement bridges and structures consistent with the overall architectural style of the Merritt Parkway. Additional mitigation measures above what the proposed design will include as a component of the proposed design would be identified through discussions with the interested parties and project stakeholders and confirmed by the State.

From: Labadia, Catherine
Sent: Monday, August 24, 2020 10:55 AM
To: McMillan, Mark J.; Kinney, Jonathan; Scofield, Jenny
Cc: Murphy, Lynn D.; Doyle, Thomas H
Subject: RE: Checking in on Route 7/15 Interchange Report

Yes, that was the question and thank you for the answer. I hope your Monday just keeps getting better.
Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Monday, August 24, 2020 10:53 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Cc: Murphy, Lynn D. <Lynn.Murphy@ct.gov>; Doyle, Thomas H <Thomas.Doyle@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Cathy,

Just one clarification on Q/A #2: The VIAA will definitely be in the Appendices of the EA/EIE document.

If I'm reading your question correctly, yes, it will also be an Appendix of the Public Report that will go to the Consulting Parties as part of the §106 evaluation.

Mark

From: Labadia, Catherine <Catherine.Labadia@ct.gov>
Sent: Monday, August 24, 2020 10:39 AM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Good Morning Mark,

So I do not miss anything, here is a response to each of your questions:

1. SHPO has reviewed the draft report and appreciates the changes, additional images, and text corrections. We have no additional edits or comments at this time.
2. Jenny has not had the opportunity to view the VIAA, but I did a cursory review and the methods are consistent with other visual analysis reports our office receives. We just want to confirm that the VIAA will be included as an appendix for public consideration.
3. Based on the information presented in the VIAA, SHPO concurs with the APE for the undertaking at this early stage of planning.

Let me know if you want any of this in a formal letter or separate communication.

Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia,

Catherine <Catherine.Labadia@ct.gov>

Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358).

I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?
2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner

Office of Environmental Planning

Environmental / Historical Documents Unit

Connecticut Department of Transportation

2800 Berlin Turnpike

Newington, CT 06131



(860) 594-2135



(860) 594-3028 - Fax



mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Monday, August 24, 2020 10:46 AM
To: Labadia, Catherine; Kinney, Jonathan; Scofield, Jenny
Subject: RE: Checking in on Route 7/15 Interchange Report

Cathy,

That checks all the little boxes on my list of things to do (last week). It's a great start to my Monday.

Have a good day!

M

From: Labadia, Catherine <Catherine.Labadia@ct.gov>
Sent: Monday, August 24, 2020 10:39 AM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Good Morning Mark,

So I do not miss anything, here is a response to each of your questions:

1. SHPO has reviewed the draft report and appreciates the changes, additional images, and text corrections. We have no additional edits or comments at this time.
2. Jenny has not had the opportunity to view the VIAA, but I did a cursory review and the methods are consistent with other visual analysis reports our office receives. We just want to confirm that the VIAA will be included as an appendix for public consideration.
3. Based on the information presented in the VIAA, SHPO concurs with the APE for the undertaking at this early stage of planning.

Let me know if you want any of this in a formal letter or separate communication.

Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358).

I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?

2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131



(860) 594-2135



(860) 594-3028 - Fax



mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan; Scofield, Jenny; Labadia, Catherine
(Catherine.Labadia@ct.gov)
Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358). I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?
2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.
If this is an urgent matter, please email me your telephone number and I will contact you.
Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
☎ (860) 594-2135
☎ (860) 594-3028 - Fax
✉ mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Friday, August 14, 2020 3:25 PM
To: Kinney, Jonathan; Scofield, Jenny
Cc: Labadia, Catherine (Catherine.Labadia@ct.gov)
Subject: Revised Cultural Resources/"Public Report" for State Project 102-358 - Route 7/15 Interchange, Norwalk

Good afternoon, Jenny, Jonathan, Cathy,

Below is a link to the latest (and hopefully FINAL) round of revisions to the Public Report for the Route 7/15 Interchange project in Norwalk. The consultant has made revisions based on SHPO's comments and I'm sending you the latest round to see if the changes meet your office's expectations. I will also send a second link directly from O365, since past experience has shown that embedding a link in an email like this doesn't always work.

https://ctgovexec.sharepoint.com/:b:/s/DOTPPCulturalResourceEnvironmentalDocs/ETuW_RXJxMRGsd_bfKczfNj4BezaTTEHFarFw9ASJ5R1FdA?e=L98Ymc

If you have any questions about the links, the report, or the revisions, please don't hesitate to contact me.

Wishing you a great weekend,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

☎ (860) 594-2135

☎ (860) 594-3028 - Fax

✉ mark.mcmillan@ct.gov

From: Labadia, Catherine <no-reply@sharepointonline.com>
Sent: Tuesday, March 17, 2020 2:07 PM
To: McMillan, Mark J.
Cc: Labadia, Catherine
Subject: Labadia, Catherine shared "2020-2-5 FINAL 7_15 Public Phase I_II_" with you.

Let me know if it works.
Cathy



This link only works for the direct recipients of this message.



2020-2-5 FINAL 7_15 Public Phase I_II_

Open



Sender will be notified when you open this link for the first time.

Microsoft respects your privacy. To learn more, please read our [Privacy Statement](#).
Microsoft Corporation, One Microsoft Way, Redmond, WA 98052

From: Labadia, Catherine
Sent: Tuesday, February 11, 2020 11:05 AM
To: McMillan, Mark J.
Subject: RE: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Got it.
Thanks,
Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, February 11, 2020 11:00 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Ms. Labadia,

Below is a link to the revised Phase I/II Cultural Resources Report for State Project #102-358 in Norwalk. The file '2020-2-5 FINAL 7_15 Public Phase I_II_.docx' has been reviewed by the cultural resources staff and project consultant. We are forwarding it to SHPO for your office's review. Please let us know if you have any comments. Given the schedule of this project, we would like to receive this input within 30 days (by March 11, 2020). Please note that the link will expire at the end of this week, but the file may be downloaded and reviewed locally. If you encounter any problems with this link or the document, please let me know.

Login Information

FTP link: <https://tmpsftp.stantec.com>

Login name: s0131082553

Password: 6371732

Disk Quota: 2GB

NEW Expiry Date: 2/14/2020

Thank you,

Mark

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
☎ (860) 594-2135

☎ (860) 594-3028 - Fax
✉ mark.mcmillan@ct.gov



From: Speal, Charles S
Sent: Tuesday, April 16, 2019 12:00 PM
To: Labadia, Catherine; Wisniewski, Marena; Scofield, Jenny;
'jquinn[REDACTED]'; 'acholewa[REDACTED]';
'mturnbull@mptn-nsn.gov'; 'dhnithpc[REDACTED]';
'maxbrowngarcia[REDACTED]'; 'temple@delawaretribe.org';
'kpenrod[REDACTED]'; 'skleppin@norwalkct.org';
'CWigren@cttrust.org'; 'jmontanaro@cttrust.org'; 'circuitrider@cttrust.org';
'director@norwalkhistoricalsociety.org'; 'tbryant23[REDACTED]';
'llevey.architect[REDACTED]'; 'dgwestmoreland[REDACTED]';
'viteretto@heritagelandscapes.com'; 'akibbe[REDACTED]';
'connecticut.chapter@sierraclub.org'; 'p.fraboni@earthplace.org';
'emerritt@savingplaces.org'; 'sworden@savingplaces.org';
'sstokely@achp.gov'; Riese, Frederick
Cc: 'kurt.salmoiraghi@dot.gov'; 'emilie.holland@dot.gov'; McMillan, Mark J.;
Lesay, Kimberly C; Doyle, Thomas H; Murphy, Lynn D.; Cherpak, Michael S;
Fiedler, Susan L; 'Melissa Pineda'; Fesenmeyer, Andy A.; Antoniak, Yolanda M;
'Eberle, John'; 'Ken Livingston'
Subject: Section 106 Subcommittee Meeting -- CTDOT Proj No 102-358, Route 7/15
Interchange, Norwalk
Attachments: CRPublicReport Route 7_15Norwalk.pdf

Greetings from the Connecticut Department of Transportation (CTDOT),

As an identified Section 106 consulting party to State Project Number 102-358 involving reconstruction of the Route 7 / Route 15 interchange in the City of Norwalk, CTDOT and the Federal Highway Administration wish to invite you to a face-to-face meeting to discuss potential project-related historic property impacts under the terms of the National Historic Preservation Act. This meeting is to be held in Room 101 of the Norwalk City Hall on May 7th from 10:00am until noon. Norwalk City Hall is located at:

125 East Avenue
Norwalk, CT 06851

There is ample free parking adjacent to the City Hall building, accessible via City Hall Drive.

You should find the Phase I/II cultural resources assessment and archaeological reconnaissance survey summary report attached to this message. This report presents anticipated impacts to the various National Register of Historic Places-listed or eligible properties within the project area of potential effect associated with the design alternatives still under consideration. The findings and recommendations presented in the report will be discussed at the upcoming meeting.

If, after the meeting, you still have questions, comments, or concerns—or feel that an important historic resource has been omitted—we invite you to respond within 30 calendar days to the email address below:

dot.environmentalplanning@ct.gov

We encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn more about the Section 106 process and your role as a consulting party. If you do **not** wish to review these documents in the future or continue as a consulting party under Section 106, please respond to us to that effect in written correspondence at the above email address.

We thank you for your time and input and look forward to seeing you at the upcoming meeting.

Sincere Regards,

C. Scott Speal
National Register Specialist, Archaeology
Environmental Documents / Cultural Resources Unit
Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

February 1, 2018

Ms. Kristina Newman-Scott
Director of Culture
One Constitution Plaza, Second Floor
Hartford, CT 06103

Dear: Ms. Newman-Scott,

Subject: Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358
Invitation to Agency Coordination Meeting

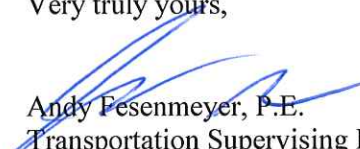
The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (Department) are initiating the Route 7/Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15), and Main Avenue in the city of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA)/Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA/CEPA.

Your agency has been identified as one that may have an interest in this project because of the resources located in the project area or permits required. Accordingly, the Department is sending you a copy of the latest Purpose and Need Statement dated January 24, 2018 for your review and consideration, including a project study area map. You are also encouraged to visit the project website to learn more at www.7-15norwalk.com. A public Project Scoping Meeting was held on October 17, 2017 and formal notice of this meeting was published in the *Connecticut Environmental Monitor* on October 3, October 17, and November 7, 2017.

The Department would like to invite you to participate in an Agency Coordination Meeting being held Wednesday, February 28, 2018 at 1:00 p.m. in Room 3130 at CTDOT Headquarters, 2800 Berlin Turnpike, Newington, Connecticut. Please let us know if you or your designee will be attending.

If you have any questions or comments regarding the enclosed project information, the Department encourages you or your designee to either attend the agency coordination meeting or contact me directly, at Andy.Fesenmeyer@ct.gov or (860) 594-3228.

Very truly yours,


Andy Fesenmeyer, P.E.
Transportation Supervising Engineer
Bureau of Engineering and Construction

Enclosure
cc: John Eberle, Stantec
Kenneth Livingston, FHI

From: Hansen, Christopher (FHWA)
Cc: ["Speal, Charles S"](#); ["Mark.McMillan@ct.gov"](#); [Doyle, Thomas H](#); [Zimyeski, Melanie S](#); [Fesenmeyer, Andy A](#); [Antoniak, Yolanda M](#); [Eberle, John \(John.Eberle@stantec.com\)](#); [Powell, Eloise \(FHWA\)](#)
Bcc: [Riese, Frederick](#); ["susan.fiedler@ct.gov"](#); ["emerritt@savingplaces.org"](#); ["sworden@savingplaces.org"](#); ["Labadia, Catherine"](#); [Scofield, Jenny](#); ["skleppin@norwalkct.org"](#); ["Christopher Wigren"](#); ["jmontanaro@cttrust.org"](#); ["circuitrider@cttrust.org"](#); ["jgsmyth@cttrust.org"](#); ["jill@merrittparkway.org"](#); ["Calabrese, Michael N"](#); ["info@norwalklandtrust.org"](#); ["director@norwalkhistoricalsociety.org"](#); ["tbryant23@norwalkhistoricalsociety.org"](#); ["llevey.architect@norwalkhistoricalsociety.org"](#); ["dgwestmoreland@norwalkhistoricalsociety.org"](#); ["viteretto@heritagelandscapes.com"](#); ["akibbe@norwalkhistoricalsociety.org"](#); ["connecticut.chapter@sierraclub.org"](#); ["p.fraboni@earthplace.org"](#)
Subject: Consulting Party Introduction Message - Route 7/15 Norwalk Project
Date: Tuesday, November 21, 2017 3:52:00 PM

Good day,

You are receiving this communication because you have been identified as a consulting party to Connecticut State Project Number 102-358, involving reconstruction of the Route 7/Route 15 interchange, under the provisions of Section 106 of the National Historic Preservation Act.

The purpose of the [Route 7/15 Norwalk Project](#) is to provide missing connections between Route 7 and Route 15 (Merritt Parkway), and improve mobility, access, and safety for all users.

I encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn about the Section 106 process and your role as a consulting party.

Very soon, you will be receiving the Phase Ia cultural resources assessment / technical report for the preliminary design alternatives under evaluation for this undertaking. We invite you to review this report and ask that you respond within 30 calendar days of receiving it with any comments, concerns, or omissions you find.

While the Federal Highway Administration (FHWA) is the lead federal agency, the Connecticut Department of Transportation (CTDOT) is responsible for administering many Section 106 responsibilities on behalf of FHWA. Going forward, please direct comments and questions to:

Mr. Scott Speal
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation
Phone: 860-594-2918
Email: dot.environmentalplanning@ct.gov

If you do not wish to review this document or continue as a consulting party under Section 106, please respond to Mr. Speal to this effect in written correspondence at the above email address.

If correspondence by email is a problem for your organization, please contact Mr. Speal to arrange for alternative delivery.

If you have any questions or concerns, please feel free to contact me. We thank you for your time and input and look forward to working with you toward preservation and effective management of Connecticut's cultural heritage.

Sincere regards,

Chris Hansen
Environmental Protection Specialist
Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033
860.494.7577
christopher.hansen@dot.gov

From: Speal, Charles S
Sent: Wednesday, May 3, 2017 9:29 AM
To: Labadia, Catherine
Subject: Initiation of Consultation -- CTDOT Proj No 102-358 in Norwalk

Hello Cathy,

OEP would like to initiate consultation with your office under Section 106 of the NHPA, NEPA and CEPA with regard to Improvements to the Route 7 / Route 15 Interchange in the City of Norwalk. Please find attached an introduction letter including the draft Purpose and Need Statement, which should have already been transmitted to your office separately, and a Phase Ia cultural resource assessment survey of the proposed project area. Invitations to project status and progress meetings will be forthcoming in the near future.

Feel free to contact with any questions.

Best,

C. Scott Speal
National Register Specialist, Archaeology

Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov

From: Kinney, Jonathan
Sent: Friday, November 20, 2020 3:59 PM
To: Karmazinas, Lucas; McMillan, Mark J.
Cc: Labadia, Catherine; Scofield, Jenny
Subject: Route 15/Route7 Interchange - Norwalk Review Letter
Attachments: 106_Route 715 Interchange_Norwalk_DOT_AE_20Nov2020.pdf

Good afternoon Lucas/Mark,

Please see our attached review letter for the Route 15/Route 7 Interchange project. Feel free to reach out with any questions you may have. Thank you and have a great weekend.

Jonathan Kinney
Director of Operations
Deputy State Historic Preservation Officer

Connecticut State Historic Preservation Office
Department of Economic & Community Development
State of Connecticut
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
O: 860.500.2380
Jonathan.kinney@ct.gov



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).

Follow us on:



From: McMillan, Mark J.
Sent: Monday, August 24, 2020 10:46 AM
To: Labadia, Catherine; Kinney, Jonathan; Scofield, Jenny
Subject: RE: Checking in on Route 7/15 Interchange Report

Cathy,

That checks all the little boxes on my list of things to do (last week). It's a great start to my Monday.

Have a good day!

M

From: Labadia, Catherine <Catherine.Labadia@ct.gov>
Sent: Monday, August 24, 2020 10:39 AM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Good Morning Mark,

So I do not miss anything, here is a response to each of your questions:

1. SHPO has reviewed the draft report and appreciates the changes, additional images, and text corrections. We have no additional edits or comments at this time.
2. Jenny has not had the opportunity to view the VIAA, but I did a cursory review and the methods are consistent with other visual analysis reports our office receives. We just want to confirm that the VIAA will be included as an appendix for public consideration.
3. Based on the information presented in the VIAA, SHPO concurs with the APE for the undertaking at this early stage of planning.

Let me know if you want any of this in a formal letter or separate communication.

Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358).

I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?

2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner

Office of Environmental Planning

Environmental / Historical Documents Unit

Connecticut Department of Transportation

2800 Berlin Turnpike

Newington, CT 06131



(860) 594-2135



(860) 594-3028 - Fax



mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan; Scofield, Jenny; Labadia, Catherine
(Catherine.Labadia@ct.gov)
Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358). I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?
2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.
If this is an urgent matter, please email me your telephone number and I will contact you.
Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
☎ (860) 594-2135
☎ (860) 594-3028 - Fax
✉ mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Friday, August 14, 2020 3:25 PM
To: Kinney, Jonathan; Scofield, Jenny
Cc: Labadia, Catherine (Catherine.Labadia@ct.gov)
Subject: Revised Cultural Resources/"Public Report" for State Project 102-358 - Route 7/15 Interchange, Norwalk

Good afternoon, Jenny, Jonathan, Cathy,

Below is a link to the latest (and hopefully FINAL) round of revisions to the Public Report for the Route 7/15 Interchange project in Norwalk. The consultant has made revisions based on SHPO's comments and I'm sending you the latest round to see if the changes meet your office's expectations. I will also send a second link directly from O365, since past experience has shown that embedding a link in an email like this doesn't always work.

https://ctgovexec.sharepoint.com/:b:/s/DOTPPCulturalResourceEnvironmentalDocs/ETuW_RXJxMRGsd_bfKczfNj4BezaTTEHFarFw9ASJ5R1FdA?e=L98Ymc

If you have any questions about the links, the report, or the revisions, please don't hesitate to contact me.

Wishing you a great weekend,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

☎ (860) 594-2135

☎ (860) 594-3028 - Fax

✉ mark.mcmillan@ct.gov

From: Labadia, Catherine <no-reply@sharepointonline.com>
Sent: Tuesday, March 17, 2020 2:07 PM
To: McMillan, Mark J.
Cc: Labadia, Catherine
Subject: Labadia, Catherine shared "2020-2-5 FINAL 7_15 Public Phase I_II_" with you.

Let me know if it works.
Cathy



This link only works for the direct recipients of this message.



2020-2-5 FINAL 7_15 Public Phase I_II_

Open



Sender will be notified when you open this link for the first time.

Microsoft respects your privacy. To learn more, please read our [Privacy Statement](#).
Microsoft Corporation, One Microsoft Way, Redmond, WA 98052

From: Labadia, Catherine
Sent: Tuesday, February 11, 2020 11:05 AM
To: McMillan, Mark J.
Subject: RE: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Got it.
Thanks,
Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, February 11, 2020 11:00 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Ms. Labadia,

Below is a link to the revised Phase I/II Cultural Resources Report for State Project #102-358 in Norwalk. The file '2020-2-5 FINAL 7_15 Public Phase I_II_.docx' has been reviewed by the cultural resources staff and project consultant. We are forwarding it to SHPO for your office's review. Please let us know if you have any comments. Given the schedule of this project, we would like to receive this input within 30 days (by March 11, 2020). Please note that the link will expire at the end of this week, but the file may be downloaded and reviewed locally. If you encounter any problems with this link or the document, please let me know.

Login Information

FTP link: <https://tmpsftp.stantec.com>

Login name: s0131082553

Password: 6371732

Disk Quota: 2GB

NEW Expiry Date: 2/14/2020

Thank you,

Mark

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
☎ (860) 594-2135

☎ (860) 594-3028 - Fax
✉ mark.mcmillan@ct.gov



From: Speal, Charles S
Sent: Tuesday, April 16, 2019 12:00 PM
To: Labadia, Catherine; Wisniewski, Marena; Scofield, Jenny; 'jquinn[REDACTED]'; 'acholewa[REDACTED]'; 'mturnbull@mptn-nsn.gov'; 'dhnithpc[REDACTED]'; 'maxbrowngarcia[REDACTED]'; 'temple@delawaretribe.org'; 'kpenrod[REDACTED]'; 'skleppin@norwalkct.org'; 'CWigren@cttrust.org'; 'jmontanaro@cttrust.org'; 'circuitrider@cttrust.org'; 'director@norwalkhistoricalsociety.org'; 'tbryant23[REDACTED]'; 'llevey.architect[REDACTED]'; 'dgwestmoreland[REDACTED]'; 'viteretto@heritagelandscapes.com'; 'akibbe[REDACTED]'; 'connecticut.chapter@sierraclub.org'; 'p.fraboni@earthplace.org'; 'emerritt@savingplaces.org'; 'sworden@savingplaces.org'; 'sstokely@achp.gov'; Riese, Frederick
Cc: 'kurt.salmoiraghi@dot.gov'; 'emilie.holland@dot.gov'; McMillan, Mark J.; Lesay, Kimberly C; Doyle, Thomas H; Murphy, Lynn D.; Cherpak, Michael S; Fiedler, Susan L; 'Melissa Pineda'; Fesenmeyer, Andy A.; Antoniak, Yolanda M; 'Eberle, John'; 'Ken Livingston'
Subject: Section 106 Subcommittee Meeting -- CTDOT Proj No 102-358, Route 7/15 Interchange, Norwalk
Attachments: CRPublicReport Route 7_15Norwalk.pdf

Greetings from the Connecticut Department of Transportation (CTDOT),

As an identified Section 106 consulting party to State Project Number 102-358 involving reconstruction of the Route 7 / Route 15 interchange in the City of Norwalk, CTDOT and the Federal Highway Administration wish to invite you to a face-to-face meeting to discuss potential project-related historic property impacts under the terms of the National Historic Preservation Act. This meeting is to be held in Room 101 of the Norwalk City Hall on May 7th from 10:00am until noon. Norwalk City Hall is located at:

125 East Avenue
Norwalk, CT 06851

There is ample free parking adjacent to the City Hall building, accessible via City Hall Drive.

You should find the Phase I/II cultural resources assessment and archaeological reconnaissance survey summary report attached to this message. This report presents anticipated impacts to the various National Register of Historic Places-listed or eligible properties within the project area of potential effect associated with the design alternatives still under consideration. The findings and recommendations presented in the report will be discussed at the upcoming meeting.

If, after the meeting, you still have questions, comments, or concerns—or feel that an important historic resource has been omitted—we invite you to respond within 30 calendar days to the email address below:

dot.environmentalplanning@ct.gov

We encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn more about the Section 106 process and your role as a consulting party. If you do **not** wish to review these documents in the future or continue as a consulting party under Section 106, please respond to us to that effect in written correspondence at the above email address.

We thank you for your time and input and look forward to seeing you at the upcoming meeting.

Sincere Regards,

C. Scott Speal
National Register Specialist, Archaeology
Environmental Documents / Cultural Resources Unit
Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

February 1, 2018

Ms. Kristina Newman-Scott
Director of Culture
One Constitution Plaza, Second Floor
Hartford, CT 06103

Dear: Ms. Newman-Scott,

Subject: Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358
Invitation to Agency Coordination Meeting

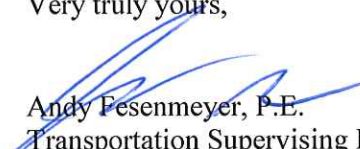
The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (Department) are initiating the Route 7/Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15), and Main Avenue in the city of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA)/Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA/CEPA.

Your agency has been identified as one that may have an interest in this project because of the resources located in the project area or permits required. Accordingly, the Department is sending you a copy of the latest Purpose and Need Statement dated January 24, 2018 for your review and consideration, including a project study area map. You are also encouraged to visit the project website to learn more at www.7-15norwalk.com. A public Project Scoping Meeting was held on October 17, 2017 and formal notice of this meeting was published in the *Connecticut Environmental Monitor* on October 3, October 17, and November 7, 2017.

The Department would like to invite you to participate in an Agency Coordination Meeting being held Wednesday, February 28, 2018 at 1:00 p.m. in Room 3130 at CTDOT Headquarters, 2800 Berlin Turnpike, Newington, Connecticut. Please let us know if you or your designee will be attending.

If you have any questions or comments regarding the enclosed project information, the Department encourages you or your designee to either attend the agency coordination meeting or contact me directly, at Andy.Fesenmeyer@ct.gov or (860) 594-3228.

Very truly yours,


Andy Fesenmeyer, P.E.
Transportation Supervising Engineer
Bureau of Engineering and Construction

Enclosure
cc: John Eberle, Stantec
Kenneth Livingston, FHI

From: Hansen, Christopher (FHWA)
Cc: ["Speal, Charles S"](#); ["Mark.McMillan@ct.gov"](#); [Doyle, Thomas H](#); [Zimyeski, Melanie S](#); [Fesenmeyer, Andy A](#); [Antoniak, Yolanda M](#); [Eberle, John \(John.Eberle@stantec.com\)](#); [Powell, Eloise \(FHWA\)](#)
Bcc: [Riese, Frederick](#); ["susan.fiedler@ct.gov"](#); ["emerritt@savingplaces.org"](#); ["sworden@savingplaces.org"](#); ["Labadia, Catherine"](#); [Scofield, Jenny](#); ["skleppin@norwalkct.org"](#); ["Christopher Wigren"](#); ["jmontanaro@cttrust.org"](#); ["circuitrider@cttrust.org"](#); ["jgsmyth@cttrust.org"](#); ["jill@merrittparkway.org"](#); ["Calabrese, Michael N"](#); ["info@norwalklandtrust.org"](#); ["director@norwalkhistoricalsociety.org"](#); ["tbryant23@norwalkhistoricalsociety.org"](#); ["llevey.architect@norwalkhistoricalsociety.org"](#); ["dgwestmoreland@norwalkhistoricalsociety.org"](#); ["viteretto@heritagelandscapes.com"](#); ["akibbe@norwalkhistoricalsociety.org"](#); ["connecticut.chapter@sierraclub.org"](#); ["p.fraboni@earthplace.org"](#)
Subject: Consulting Party Introduction Message - Route 7/15 Norwalk Project
Date: Tuesday, November 21, 2017 3:52:00 PM

Good day,

You are receiving this communication because you have been identified as a consulting party to Connecticut State Project Number 102-358, involving reconstruction of the Route 7/Route 15 interchange, under the provisions of Section 106 of the National Historic Preservation Act.

The purpose of the [Route 7/15 Norwalk Project](#) is to provide missing connections between Route 7 and Route 15 (Merritt Parkway), and improve mobility, access, and safety for all users.

I encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn about the Section 106 process and your role as a consulting party.

Very soon, you will be receiving the Phase Ia cultural resources assessment / technical report for the preliminary design alternatives under evaluation for this undertaking. We invite you to review this report and ask that you respond within 30 calendar days of receiving it with any comments, concerns, or omissions you find.

While the Federal Highway Administration (FHWA) is the lead federal agency, the Connecticut Department of Transportation (CTDOT) is responsible for administering many Section 106 responsibilities on behalf of FHWA. Going forward, please direct comments and questions to:

Mr. Scott Speal
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation
Phone: 860-594-2918
Email: dot.environmentalplanning@ct.gov

If you do not wish to review this document or continue as a consulting party under Section 106, please respond to Mr. Speal to this effect in written correspondence at the above email address.

If correspondence by email is a problem for your organization, please contact Mr. Speal to arrange for alternative delivery.

If you have any questions or concerns, please feel free to contact me. We thank you for your time and input and look forward to working with you toward preservation and effective management of Connecticut's cultural heritage.

Sincere regards,

Chris Hansen

Environmental Protection Specialist

Federal Highway Administration

628-2 Hebron Avenue, Suite 303

Glastonbury, CT 06033

860.494.7577

christopher.hansen@dot.gov

From: Speal, Charles S
Sent: Wednesday, May 3, 2017 9:29 AM
To: Labadia, Catherine
Subject: Initiation of Consultation -- CTDOT Proj No 102-358 in Norwalk

Hello Cathy,

OEP would like to initiate consultation with your office under Section 106 of the NHPA, NEPA and CEPA with regard to Improvements to the Route 7 / Route 15 Interchange in the City of Norwalk. Please find attached an introduction letter including the draft Purpose and Need Statement, which should have already been transmitted to your office separately, and a Phase Ia cultural resource assessment survey of the proposed project area. Invitations to project status and progress meetings will be forthcoming in the near future.

Feel free to contact with any questions.

Best,

C. Scott Speal
National Register Specialist, Archaeology

Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov

Appendix D - Tribal Consultation

From: Holland, Emilie (FHWA) <emilie.holland@dot.gov>
Sent: Wednesday, January 20, 2021 8:07 AM
To: McMillan, Mark J.
Cc: Speal, Charles S; Carifa, Kevin F; Salmoiraghi, Kurt (FHWA)
Subject: September 2020 - Tribal Consultation
Attachments: Route 7 Route 15 Interchange Project.pdf

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello Mark,

Please see the attached response received from The Delaware Nation regarding project 0102-0358 – Rt 7 & 15 Interchange, in Norwalk. This is the Merritt Parkway project with an Environmental Assessment under development. The project was sent for consultation in September 2020. This project has been subject to the ACHP recognized pause in Section 106 consultation.

Please note that the Delaware Nation has indicated their intent to participate in consultation on this project.

Consultation for all of the September projects, including this one, remains ongoing at this time.

Thank you,

-Emilie

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 628-2 Hebron Avenue – Suite 303, Glastonbury, CT 06033

From: emilie.holland@dot.gov
Sent: Wednesday, September 23, 2020 8:42 PM
To: jquinn[REDACTED]; acholewa[REDACTED];
mturnbull@mptn-nsn.gov; mejohnson@mptn-nsn.gov;
maxbrowngarcia[REDACTED]; brwnjbb123[REDACTED]
Cc: Speal, Charles S; Karmazinas, Lucas; McMillan, Mark J.; Lesay, Kimberly C;
kurt.salmoiraghi@dot.gov
Subject: September 2020 - FHWA CT Consultation (Statewide)

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

You have received 4 secure files from Emilie.holland@dot.gov.

Use the secure links below to download.

Dear Tribal Representatives,

Please see consultation documents attached.

Thank You,

-Emilie

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
Connecticut Division | 628-2 Hebron Avenue – Suite 303, Glastonbury, CT 06033

Secure File Downloads:

Available until: **23 October 2020**

Click links to download:

[September 2020 Tribal Letter to Initiate Monthly Consultation statewide.pdf](#)

227.30 KB, Fingerprint: 214866bfc74555504f24ba7611b0de45 ([What is this?](#))

[Granby 55-144 ConsultLetterToTribes 20200916.pdf](#)

8.86 MB, Fingerprint: 2b473f4a83b4b9a025c47cc972111dbe ([What is this?](#))

[Letter §106-Evaluation Westport158-214 20200901.pdf](#)

5.22 MB, Fingerprint: a48557337a577efcacbd651814d12ad9 ([What is this?](#))

[LETTER toFHWA Tribal-Consultation Norwalk 102-358 20200922 wAppendicies.pdf](#)

67.23 MB, Fingerprint: da9a9d47238f41dc9d59b38c11e5664c ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

January 19, 2021

To Whom It May Concern:

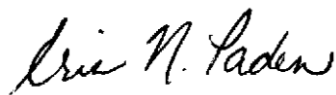
The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

**Project(s): Route 7/Route 15 Interchange Project
 State Project No. 102-358
 Norwalk, Connecticut**

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter during and prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger any known cultural, or religious sites of interest to the Delaware Nation. However, there is still the potential for the discovery of unknown resources. We would like to accept your invitation for consultation.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Historic Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405-247-2448 ext. 1403.



Erin Paden
Director of Historic Preservation
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
Ph. 405-247-2448 ext. 1403
epaden@delawarenation-nsn.gov



STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546



Transmittal:

From: Lucas A. Karmazinas
Date: September 22, 2020
Through: Robert Bell, Director, CTDOT Bureau of Policy & Planning
To: Emilie Holland, Environmental Protection Specialist
Federal Highway Administration, Connecticut Division

Project: State No.: 102-358
F.A.P. No.: 0015(133)
Project Title: Route 7/Route 15 Interchange Project
Town: Norwalk

Subject: Tribal Consultation Documentation

Description of Activity

The Connecticut Department of Transportation (CTDOT) is currently evaluating a project that will address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in Norwalk. The Merritt Parkway was developed as Connecticut's first divided-lane, limited access highway between 1934 and 1942 and it extends 37.5 miles from the New York border in the west to Stratford in the east. The Merritt Parkway was listed in the National Register of Historic Places as a historic district in 1991 and is significant at the national level under Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (embodying the distinctive characteristics of a type, period or method of construction, or possessing high artistic values).¹

The Merritt Parkway's interchange with Main Avenue (Interchange No. 40) was included as part of the parkway's original design, however, the interchange with Route 7 (Interchange No. 39) was not constructed until 1990. This being said, Interchange No. 39 provides only partial connections between the two highways and, as a result, linkages to and from the north are not provided. On the other hand, connections in all directions are presently available at Interchange No. 40, which is located approximately 1500' east of Interchange No. 39 (Image 1). The proposed State Project #102-358 seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40.

¹ National Park Service, *Merritt Parkway* (NPS #91000410), listed April 17, 1991.

Because the proposed project anticipates the use of both federal and state funding, it falls under the purview of the National Historic Preservation Act (NHPA). “Section 106” is the clause of the NHPA that mandates federal agencies to consider the effects of an undertaking on historic properties. The process is codified in 36 CFR 800.1-16, and is often referred to colloquially as “Section 106”.

Concurrent with the Section 106 evaluation, an Environmental Assessment / Environmental Impact Evaluation (EA/EIE) document is being prepared for State Project #102-358 in an effort to analyze the broader environmental impacts of proposed project alternatives in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

The EA/EIE will evaluate the impacts of the project on the man-made, social, and natural environments and will recommend the preferred alternative of action. It is currently considering three alternatives that consist of a “No Build/No Action” option and two “build” alternatives that will entail construction actions. This document will evaluate the build alternatives impacts specifically as they impact historic properties (above- and below-ground) in accordance with the provisions of Section 106 of the National Historic Preservation Act. The information provided by this review process will complement other analyses that are being conducted under NEPA/CEPA.

Each of the alternatives have been developed in association with a public stakeholder group and were presented at a public meeting conducted in 2017. CTDOT invited representatives from the Merritt Parkway Conservancy, a Project Advisory Committee, and the public to participate in the PAC meetings, and to provide input on both historic/cultural considerations as well as the environmental impacts as a whole.

Technical Review of Project

The Merritt Parkway is a divided-lane, limited access highway with two primary travel lanes in each direction (northbound and southbound). It was constructed by the State of Connecticut between 1934 and 1942 and travels on a roughly southwest to northeast course over its 37.5-mile traverse between the New York State border and Stratford, respectively. Conceived as both a high-speed transportation corridor and naturalistic landscape, the Merritt maintains a 300'-wide right-of-way (ROW) throughout its length, this providing for carefully designed sweeping curves, long-framed vistas, and a wide median and shoulders initially planted with tens-of-thousands of native trees, shrubs, and other flora.

The Merritt Parkway is also notable for its prominent over- and underpasses, of which 36 of each were originally constructed. The bridges were designed by George L. Dunkelberger, Senior Draftsman and, after 1941, the Connecticut Highway Department's Highway Architect. They feature a mix of Art Deco, Moderne, and historical revival styles, and employed cast, colored, and sgraffitto concrete and detailed ironwork. Architecturally significant works of art in their own right, the Merritt's bridges both accentuate the visual character of the parkway and blend into its naturalistic landscape.

The aforementioned developmental background and design details resulted in a historically and architecturally significant resource that justified the Merritt Parkway's inclusion on the National Register of Historic Places under Criteria A and C in 1991. Its areas of significance include Transportation (as a largely intact example of a 20th-century parkway), Architecture (for its historic bridges and rest areas), and Landscape Architecture (as a significant work of naturalistic landscape architecture). This being said, a Public Report summarizing Phase I and II Cultural Resources Surveys prepared as part of State Project #102-358 (Public Report) notes that the parkway has undergone a litany of changes since its opening in 1942.² These include "added lanes, inconsistent signage and guiderail treatments, reduction of the median, development proximity to the right-of-way, and inappropriate, lost, or overgrown plantings."³ The alterations, the report notes, however, have not compromised the overall historic character and integrity of the Merritt Parkway or, more specifically, the portion of the parkway to be potentially impacted by State Project #102-358.

As noted, the proposed undertaking seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40. At present, Interchange No. 39 provides connections only from:

- Route 7 northbound to the Merritt Parkway southbound.
- Route 7 southbound to the Merritt Parkway southbound.
- Merritt Parkway northbound to Route 7 northbound.
- Merritt Parkway northbound to Route 7 southbound.

As a result:

- Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road.
- Merritt Parkway northbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue.
- Route 7 motorists have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

On the other hand, full connections are provided between the Merritt Parkway and Main Avenue at Interchange No. 40, which would allow for use of, or integration with, aspects of this feature in implementing full connectivity between the Merritt Parkway and Route 7. A full outline of the proposed alternatives and their potential impacts on historic resources is described below in "Alternatives Under Consideration."

² Archaeological and Historical Services, Inc., *Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut*, prepared for Stantec, December 13, 2018, Updated May 15, 2020 (See Appendix A).

³ Archaeological and Historical Services, Inc., p. i.

The need to improve Interchange No. 39 became apparent not long after its initial completion. A new alternative that provided connections in all directions between the Merritt Parkway and Route 7 was designed and approved in the late 1990s, with initial construction taking place in 2005. This work was halted in 2006, however, after the Federal Highway Administration (FHWA) was successfully sued under Section 4f of the U.S. Department of Transportation Act of 1966 due to the implications of the project. Public consensus on a new design alternative was reached in 2009, yet a lack of funding prevented the project from moving forward at that time. Public coordination and further modifications to the design under the present project were initiated after federal and state funds were secured in 2016.

Project Site and Area of Potential Effects (APE)

The APE is the geographical space in which an undertaking may create changes to a historic property's character or use. According to Section 106 regulation 800.5, "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."⁴ As State Project #102-358 is currently in its preliminary design phase, the Project Site for the purposes of this review and the Phase I and II Cultural Resources Surveys consists of the greatest possible footprint of construction activities (direct effects) for all four design alternatives presently under consideration (Image 2), while the Area of Potential Effects (APE) consists of the greatest possible extent of direct and indirect effects, the latter including visual, noise, vibration, air quality, and traffic effects resultant of the proposed work (Image 3). It was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys, however, that indirect effects on air quality, noise, traffic, and vibration resultant of all of the design alternatives would be negligible.⁵ Each of the alternatives would provide improvements in the existing conditions such as air quality and traffic congestion when compared to the "no build" alternative of not taking action.

The Public Report outlines the methodology used to define the project's APE and to identify historic resources that might be potentially impacted by the project. Subsequent evaluation of project's construction (direct) and visual (indirect) effects revealed the presence of six additional Historic Properties within the APE that may be affected by the proposed project. These properties are:

Merritt Parkway Historic District

Connecticut's first divided-lane, limited access highway, alternately identified as Route 15. Built between 1934 and 1942, it extends 37.5 miles from the New York State border to Stratford.

⁴ Archaeological and Historical Services, Inc., p. 4.

⁵ Archaeological and Historical Services, Inc., p. 5.

It was listed in the National Register of Historic places in 1991 under Criteria A and C and retains its overall historic character and integrity despite various alterations over the almost 80 years since its completion.

The portion of the Merritt Parkway located within the APE extends 1.5 mile and includes five historic bridges that contribute to the Merritt Parkway Historic District. From west to east they consist of the:

- Perry Avenue Bridge (#00719) – Single-span, rigid-frame concrete bridge with arched opening built in 1936 to carry the Merritt Parkway over Perry Avenue (Image 4). It bears stylistic influences of the Art Moderne and Modern Classicism and features a concrete balustrade with a bas-relief cartouche of the Connecticut State Seal on the interior face of the northeast pylon. The bridge retains its historic character and physical integrity, however, the visual setting has been heavily impacted by the construction of flanking concrete and steel girder bridges erected as part of the Route 7 and 15 interchange project in 1990.
- Metro-North Railroad Bridge (#00720)(aka Winnipaug Railroad Bridge) – Single-span, rigid-frame, reinforced concrete bridge with arched opening built in 1937 to carry the Merritt Parkway over the Metro-North Railroad (Image 5). Utilitarian design with plain concrete abutments and wingwalls. Retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- Main Avenue Bridges (#00530A & #00530B) – Twin single-span, rigid-frame concrete bridges with arched openings and random rubble facing built in 1937 to carry the Merritt Parkway over Main Avenue (Image 6). Designed in a mixed Classical Revival and Rustic style with granite voussoirs, quoins, and coping. The northern parapet and northeast wingwall of Bridge #00530B (the northern span) were replaced in kind in 2015 and 2016, however, the bridges retain their historic character and physical integrity despite the rehabilitation and other changes to their visual setting resultant of commercial development to the north and south.
- Norwalk River Bridge (#00721) – Three-span, reinforced concrete arch bridge built in 1938 to carry the Merritt Parkway over the Norwalk River (Image 7). Utilitarian design with wide raised bands in each arch and the parapets. While the bridge was rehabilitated in 1988, it retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- West Rocks Road Bridge (#00722) – Single-span, steel, rigid-frame bridge with segmental-arch opening built to carry West Rocks Road over the Merritt Parkway in 1937 (Image 8). Designed in a mixed Moderne and Neoclassical style with ornamental metal railings and crenellated parapet. The bridge's rehabilitation in 2018 was determined to result in No Adverse Effect and, as such, the bridge retains its historic character and physical integrity.

The Public Report notes that the portion of the Merritt Parkway located within the APE has experienced numerous changes to its structures, landscape, and setting, yet it retains its overall historic character. The report reads,

The western portion of the Parkway within the APE today mostly resembles a modern interstate highway rather than a scenic parkway. It features typical modern entrances, exits, and signage and lacks historic elements found throughout the rest of the Parkway, such as a wide landscaped median. The easternmost portion of the APE, east of the Main Avenue interchange, retains more of the Parkway's historic character, derived from the planted median strip, narrow verges, and close-to-the-road landscaping. At a closer level of detail, however, exceptions can be found within these generalizations. For example, in the more highly altered western portion of the APE, there is a typical Parkway rock cut close to the roadway, at the southbound on-ramp from Route 7 North, and there is a small group of trees in the median as the roadway ascends toward the Perry Avenue undergrade bridge that is not unlike the original Parkway treatment. The overall geometry of the eastern portion of the APE is more intact, but details such as modern signage, condition of the vegetation, and modern guiderails reduce the experience of the original Parkway concept. Long views in the eastern portion reveal the dense modern commercial, office, and residential development that surrounds this portion of the Parkway.⁶

The aforementioned conditions are more comprehensively laid out in the Public Report and are based upon evaluation of eight critical components of the parkway's original design. They include roadway width, median and verges, alignment, vegetation, bridges, signage, guiderails, and views. The relevant evaluation can be found on pages 32-34.

Verneur Pratt Historic District

The Verneur Pratt Historic District is located at 144-116 Pratt Avenue and was listed on the National Register of Historic Places in 2011 (Image 9).⁷ It is comprised of a Georgian-style residence built ca. 1788 and a ca. 1800 barn associated with scientist Verneur E. Pratt, who purchased the property during the early 20th century. The historic district is located approximately 0.25-mile north of the Pratt Avenue bridge and retains its historic character and physical integrity.

Glover Avenue Bridge (#04155)

The Glover Avenue Bridge (aka Belden Hill Avenue Bridge) is a two-span, stone-arch bridge built by the City of Norwalk to carry Glover Avenue (originally Belden Hill Avenue) over the Norwalk River in 1912 (Image 10). The bridge is constructed of rubble fieldstone and is accented with brownstone voussoirs and coping.

⁶ Archaeological and Historical Services, Inc., p. 30.

⁷ National Park Service, *Verneur Pratt Historic District (NPS #11000434)*, listed July 19, 2011.

It was determined eligible for the National Register of Historic Places by CTSHPPO following documentation as part of the statewide bridge inventory completed in 1991 and was the subject of State-Level Documentation prepared under a previous iteration of State Project #102-358 in 2000.⁸ The bridge retains its historic character and physical integrity.

Archaeological Site 103-57

Archaeological Site 103-57 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D (Information Potential) as part of Phase II testing.⁹ It consists of a Middle/Late Archaic, or possibly Woodland-Age, site located within the Project Site.

Archaeological Site 103-58/60

Archaeological Site 103-58/60 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹⁰ It consists of a combined Late Archaic/Pre-Colonial site located within the Project Site.

Archaeological Site 103-61/62

Archaeological Site 103-61/62 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹¹ It consists of a combined Pre-Colonial/Middle Archaic site located within the Project Site.

Coordination and Consulting Parties

As noted, litigation halted a previous attempt to redesign the Merritt Parkway/Route 7 interchange in 2006. Subsequently, a public stakeholder group was organized, which, along with representatives from the Merritt Parkway Conservancy, public agencies, and other interested parties, would evaluate and vet possible design alternatives. Consensus on such a design, Alternative 21C, was reached following a public meeting in 2009, yet a lack of funding prevented the project from going to construction.

⁸ Bruce Clouette and Matthew Roth, *Connecticut Historic Bridge Survey; Inventory-Phase Final Report: Project Narrative, Inventory and Recommendations*, submitted to the Connecticut Department of Transportation Office of Environmental Planning, December 1990; Bruce Clouette, *Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut*, prepared April 2000 (See Appendix B).

⁹ Archaeological and Historical Services, Inc., p. 15.

¹⁰ Archaeological and Historical Services, Inc., p. 15.

¹¹ Archaeological and Historical Services, Inc., p. 15.

Federal and state funds for continued design efforts were secured in 2016, however, at which time a series of new alternatives were designed and presented for assessment by the consulting parties (including federally-recognized tribes, the Merritt Parkway Conservancy, the Project Advisory Committee, public agencies, and the public). The preferred options were presented via a project website launched in the fall of 2017, and a public scoping meeting held on October 17, 2017. The results of the scoping process can be found in a summary report prepared by FHWA and CTDOT, although the vetting of the preferred option(s) is ongoing.¹²

Alternatives Under Consideration and Potential Impacts on Historic Properties

The purpose of State Project #102-358 is to address the existing deficiencies of the Merritt Parkway's Interchange No. 39. The goal of the project is to provide for access in all directions between the Merritt Parkway and Route 7 and, as a result, improve operations and reduce congestion on Main Avenue, which currently supplements the lack of connectivity at Interchange No. 39. Two alternatives are currently being evaluated as part of the development of the EA/EIE document. Each of the alternatives will be briefly described here and evaluated with regard to their impacts specifically to historic properties. Adverse effects are the result of an undertaking altering the qualities that make a property "historic". An adverse effect will diminish one of more of the aspects of an historic property's integrity, thereby weakening the property's ability to demonstrate a connection to the past.

More detailed descriptions of the alternatives can be found in the Public Report. It should be noted that four design alternatives are described here. The Public Report was developed to provide information regarding the historic and cultural resources within the project APE. When the Public Report was initiated, four alternatives were under consideration. During the NEPA/CEPA analysis process and in conjunction with input from the Project Advisory Committee, two of the alternatives (12A and 20B) have since been removed from consideration. A brief description of them is included in this letter so that it is consistent with the Public Report.

Alternative 12A

Alternative 12A would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 11). The reconfiguration would involve elimination of the existing loop ramps at Interchange No. 40, construction of four new modified diamond interchange ramps, construction of roughly 20 new or replacement bridges, and construction of new Merritt Parkway and Route 7 on- and off-ramps. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

¹² Federal Highway Administration and Connecticut Department of Transportation, *Scoping Report: Route 7/15 Interchange Project, Norwalk, Connecticut*, prepared January 2019.

Impacts on Historic Properties resultant of Alternative 12A include demolition of both Main Avenue Bridges (#00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It would also introduce elevated ramps that, along with other changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting, could result in a loss of integrity in terms of material, design, feeling, and association. The construction of ramps that were elevated above the Merritt Parkway was found to be a critical flaw in this alternative and consequently, Alternative 12A was removed from further evaluation.

Alternative 20B

Alternative 20B would provide for the four lacking connections at Interchange No. 39 by eliminating the two direct ramps in the western quadrants of Interchange No. 39 and establishing new semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 and construction of a system of signal-controlled intersections and ramps (Image 12). The reconfiguration would involve replacement of three of the Interchange No. 39 ramps, all the existing Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 20B include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association, although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. Archaeological Sites 103-57 and 103-58/60 would not be affected by Alternative 20B.

Each alternative was evaluated on its capacity to meet the purpose and need as well as the desirable outcomes of the project. Since the Public Report study commenced, it was determined that Alternative 20B did not sufficiently meet the desirable outcomes of the project. It was removed from further consideration.

Alternative 21D

Alternative 21D would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 13). The reconfiguration would involve elimination of three of the Interchange No. 39 ramps and all of the Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 21D would include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. None of the National Register-eligible archaeological sites located in the Project Site will be affected by Alternative 21D.

Alternative 26

Alternative 26 would provide for the four lacking connections at Interchange No. 39 by introducing signalized intersections on Route 7 and establishing semi-direct connections with Interchange No. 40 through the reconfiguration of both Interchanges No. 39 and No. 40 (Image 14). The reconfiguration would involve elimination of all of the existing ramps at both interchanges, construction of new modified diamond interchange ramps in all but the heavily-traveled Route 7 northbound to Merritt Parkway westbound movement, which will require a loop ramp, and construction of roughly six new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 26 include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B), and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association. Unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. The ramps required by Alternative 26, however, would be shorter than those employed by the other alternatives, thus resulting in a lesser overall effect on the designed landscape. Alternative 26 will directly impact Archaeological Sites 103-57 and 103-58/60, yet would not result in effects to Site 103-61/62.

Recommendation

State Project #102-358 is the subject of both an Environmental Assessment under NEPA and a Section 106 review under the National Historic Preservation Act. At this time, a preferred alternative has not yet been identified from among the four under consideration. Construction of any of the design alternatives will create indirect impacts on the area in regard to air quality, noise, traffic, and vibration, however, it was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys that these effects would be negligible. In accordance with Section 106 of the National Historic Preservation Act, CTDOT offers the following recommendations of effect on historic properties caused by each of the alternatives relative to direct or visual (indirect) effects:

Alternative 21D

Alternative 21D will change the historic integrity of the Merritt Parkway and the Glover Avenue Bridge, yet will not affect any of the NR-eligible archaeological sites located within the project area. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 21D will be at or below the level of the Merritt Parkway. Regardless, this design will still constitute an *adverse effect to historic properties*.

Alternative 26

Alternative 26 will change the historic integrity of the Merritt Parkway, the Glover Avenue Bridge, and Archaeological Sites 103-57 and 103-58/60. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 26 will be at or below the level of the Merritt Parkway and all of the new ramps will be shorter than those required by the other alternatives. Regardless, this design will still constitute an *adverse effect to historic properties*.



Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation

Attached Documents:

☒ **Historic Review Map**

☒ **Supporting Documents**

- Appendix A – Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut.
- Appendix B - Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

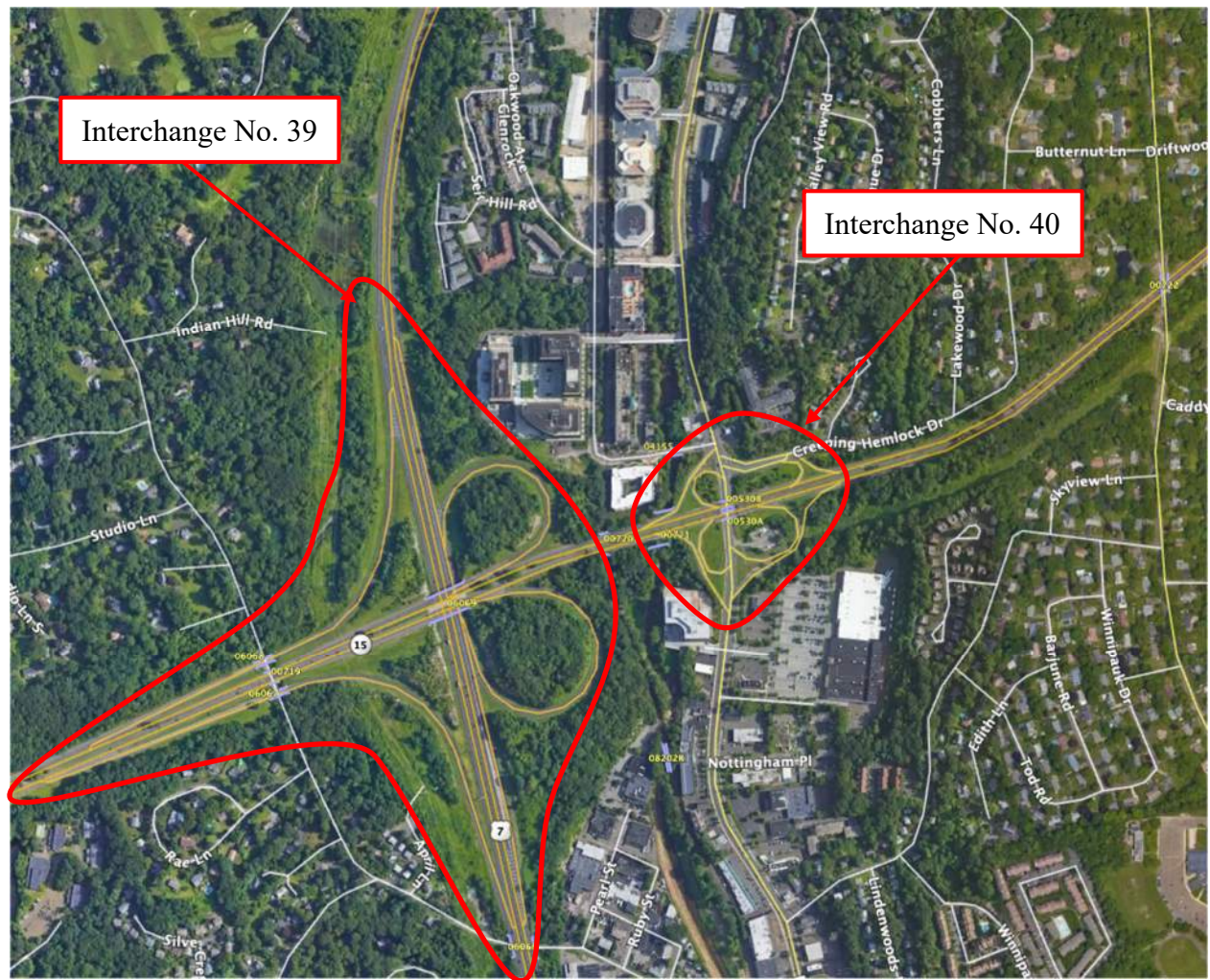


Image 1: Google Earth aerial image (2020) showing the Route 15 (Merritt Parkway) interchanges with Route 7 (Interchange No. 39) and Main Avenue (Interchange No. 40) in Norwalk.

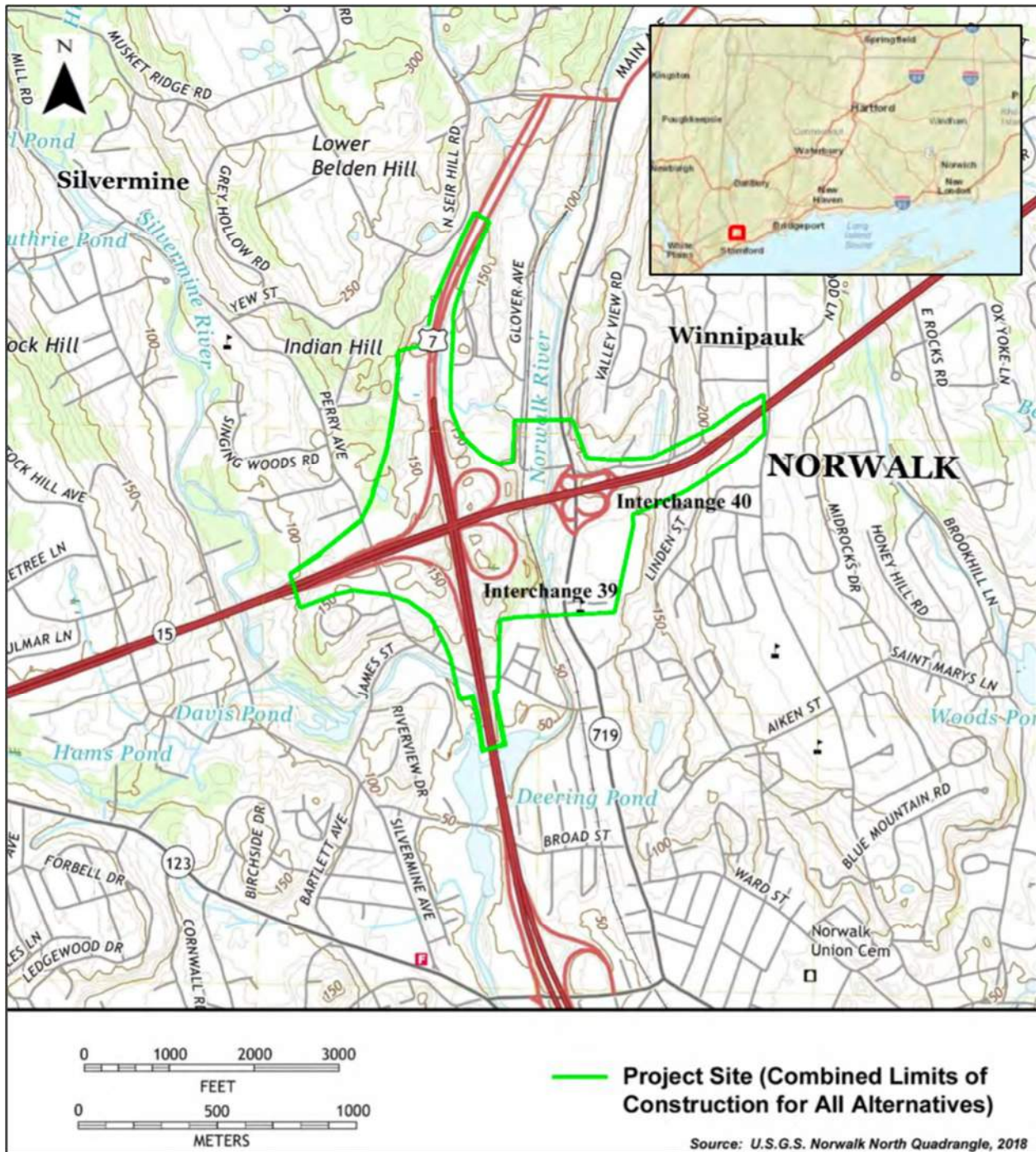


Image 2: Image showing the Project Site, which has been identified as the maximum combined limits of construction activities (direct effects) for all design alternatives.

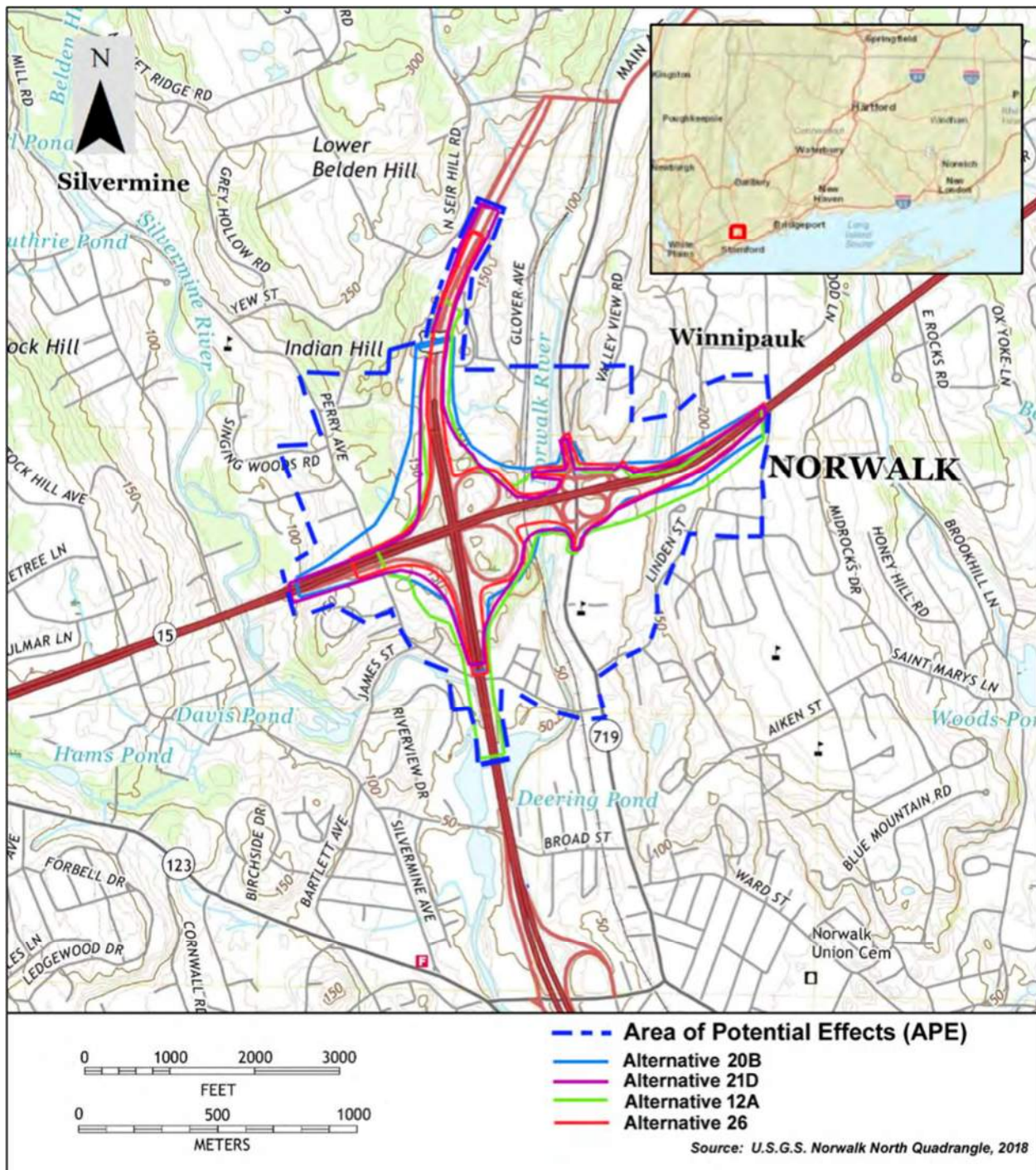


Image 3: Image showing the Area of Potential Effects (APE), which has been identified as the maximum combined limits of direct and indirect effects for all design alternatives.



Image 4: Photograph of the Merritt Parkway Perry Avenue Bridge (#00719) from Perry Avenue. Facing south.



Image 5: Photograph of the Merritt Parkway Metro-North Railroad Bridge (#00720) from the Metro-North Railroad. Facing north.



Image 6: Photograph of the Merritt Parkway Main Avenue Bridges (#00530A & #00530B) from Main Avenue. Facing north.



Image 7: Photograph of the Merritt Parkway Norwalk River Bridge (#00721) from the Norwalk River. Facing north.



Image 8: Photograph of the Merritt Parkway West Rocks Road Bridge (#00722) from the Merritt Parkway. Facing west.



Image 9: Photograph of the Verneur Pratt Historic District (114-116 Perry Avenue) from Perry Avenue. Facing northeast.



Image 10: Photograph of the Glover Avenue Bridge (aka Belden Hill Avenue Bridge, Bridge #04155) from the Norwalk River. Facing south.

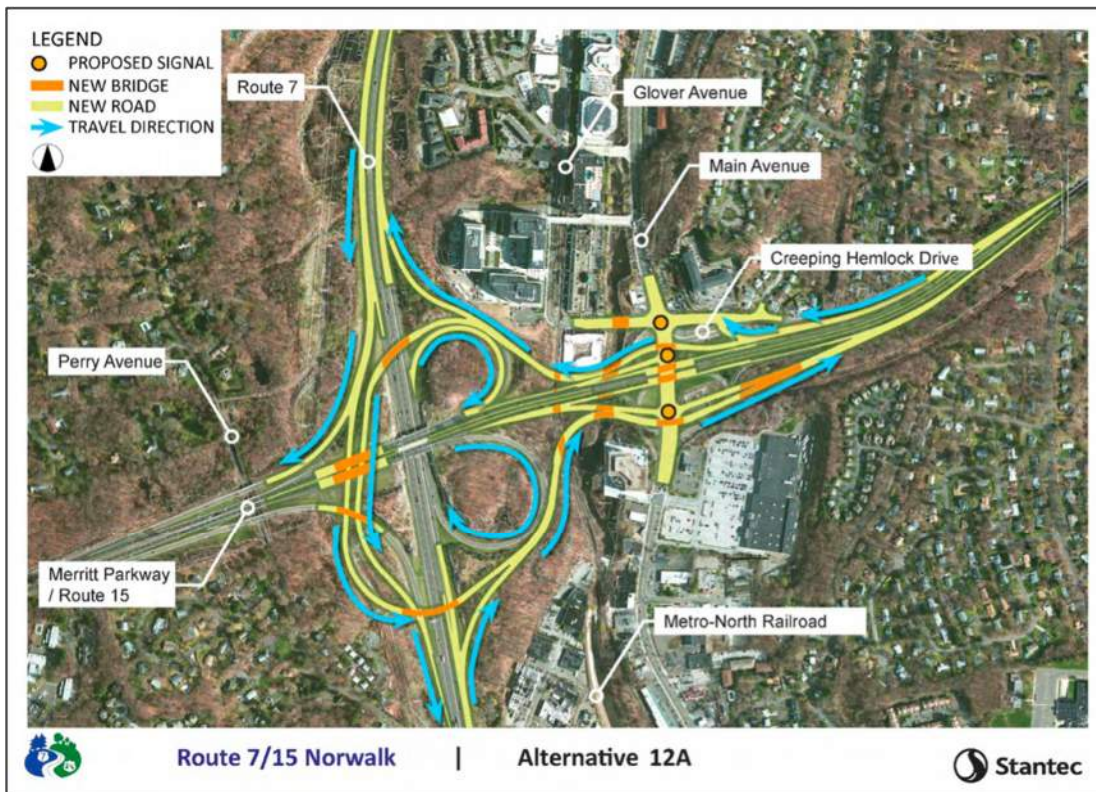


Image 11: Proposed Alternative 12A.

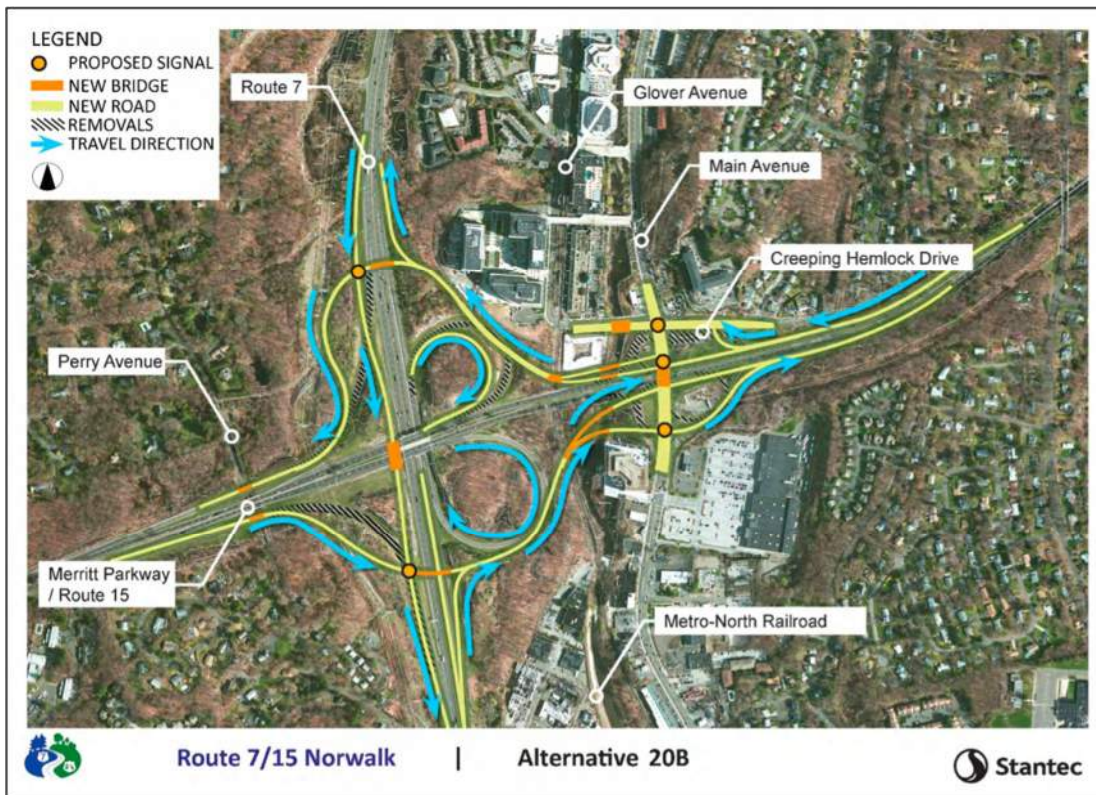


Image 12: Proposed Alternative 20B.

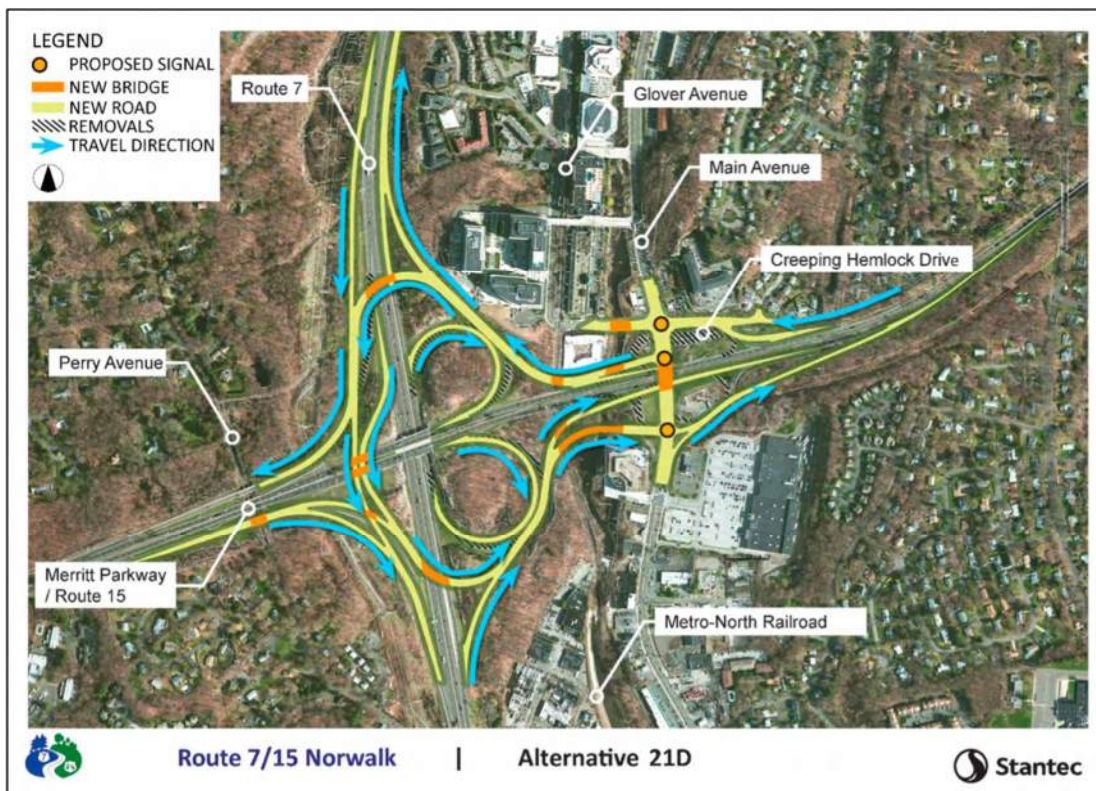


Image 13: Proposed Alternative 21D.

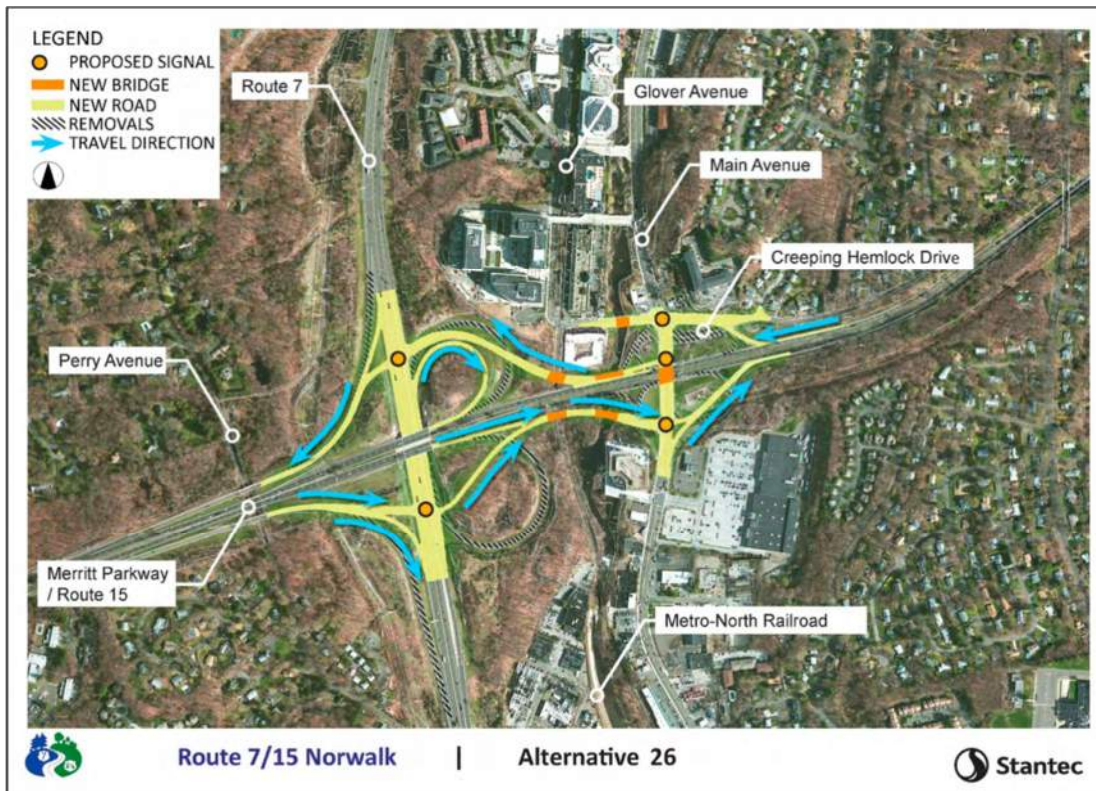
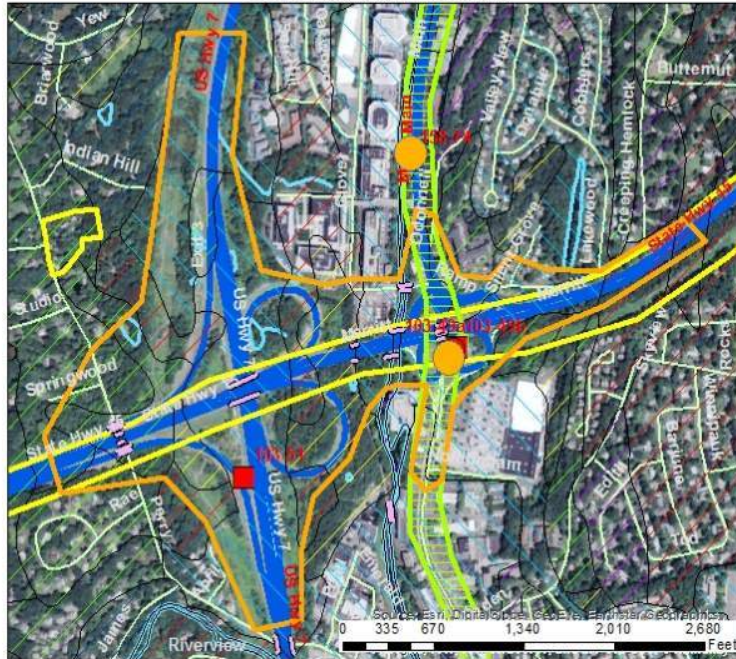
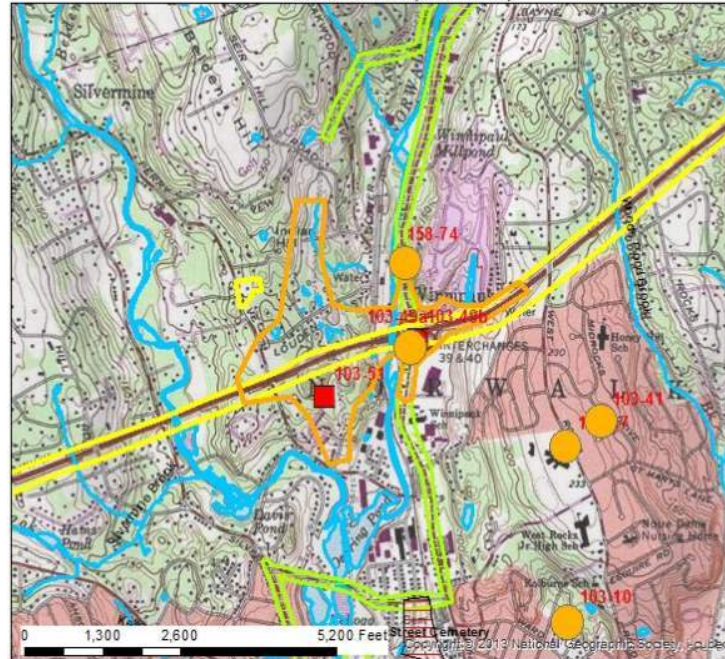


Image 14: Proposed Alternative 26.

Detail of Recent Aerial Photography



Detail of USGS Topo Quad Map

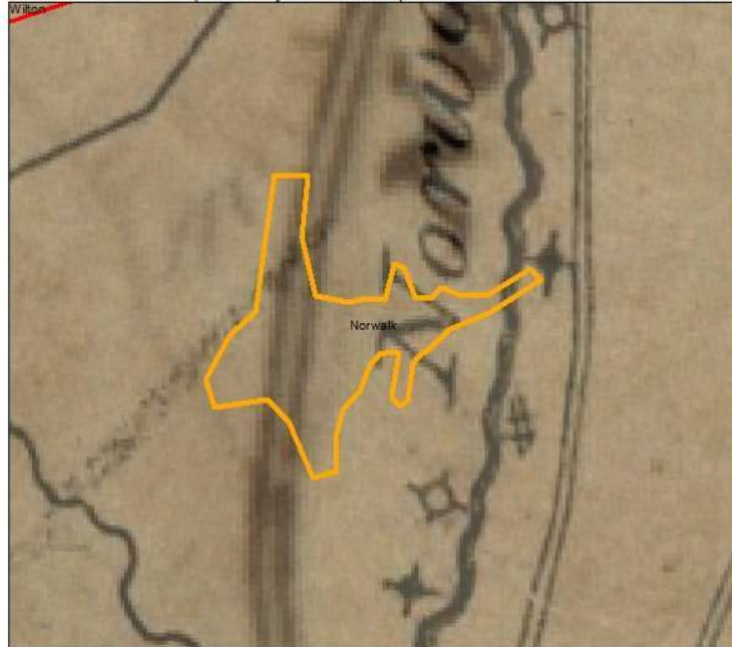


Office of Environmental Planning Environmental Review - Historical and Archaeological Resources

State Project No. 102-358
Reconstruction of
Route 7 / Route 15
Interchange
Norwalk

- Project Area
- ★ Natl Hist Landmarks
- ✱ NRHP-Listed Structures
- Historic Districts
- Cemetery
- Previous Arch Surveys

Detail of 1811 Warren Map w/ overlay of Griswold Map of Reconstructed Native Settlement circa 1625



Detail of 1856 Chace Map of Fairfield County



Approximate Location
of Archaeological Site

- Historic
- Pre-Contact
- Unknown

Predicted Archaeological
Soil Sensitivity

- | | |
|---|---|
| High | Variable |
| Moderate | Poor |
| Low | Unknown |



February 4, 2016

Appendix A

Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15
Interchange Project, State Project No. 102-358, Norwalk, Connecticut.

Appendix B

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.



U.S. Department
of Transportation
**Federal Highway
Administration**

STATE PROJECT NO. 102-358 - Route 7/Route 15 Interchange
DRAFT EA-EIE Appendix N6 - Section 106 Consultation

May 27, 2019

628-2 Hebron Avenue
Suite 303
Glastonbury, CT 06033
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HDA-CT

Dear CTDOT Cultural Resources Unit:

The Federal Highway Administration (FHWA) has conducted and concluded tribal consultation for transportation undertakings, as requested by your office. On 26 April 2019, FHWA electronically delivered information about applicable undertakings to Federally-recognized Indian tribes who have an identified area of interest in the project area.

We did not receive any comments.

The following undertakings have undergone tribal consultation:

State Project Number	Description	Summary Comments Received from Tribe(s) ¹
0102-0358	<i>Route 7/15 Interchange Improvement Project (Norwalk, Fairfield County)</i>	No comments

With this letter, Tribal consultation is concluded for the undertakings identified herein. Please work with our office to resolve any substantive comments provided by Tribes. FHWA appreciates your continued cooperation in tracking Tribal consultation outcomes and your assistance in ensuring that commitments made to Tribes are met. If you have any questions, please contact me telephone at 860-494-7577 or by email at emilie.holland@dot.gov.

Sincerely,

M. Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

McMillan, Mark J.

From: Erik.Shortell@dot.gov
Sent: Friday, April 26, 2019 10:17 AM
To: jquinn [REDACTED]; acholewa [REDACTED]; mturnbull@mptn-nsn.gov; mejohnson@mptn-nsn.gov; maxbrowngarcia [REDACTED]; dhnithpo [REDACTED]; brwnjbb123 [REDACTED]; temple@delewaretribe.org; bonney.hartley@mohican-nsn.gov; dkelly [REDACTED]
Cc: Speal, Charles S; Lesay, Kimberly C; McMillan, Mark J.; kurt.salmoiraghi@dot.gov; Emilie.holland@dot.gov
Subject: April 2019 Tribal Consultation

You have received 3 secure files from erik.shortell@dot.gov.

Use the secure links below to download.

Dear Tribal Representatives,

Please see consultation documents attached.

Thank you,

Erik Shortell
Transportation Specialist
Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033
860-494-7578

Secure File Downloads:

Available until: **26 May 2019**

Click links to download:

[Report draft Philarcheo AHS2019 Route7 15 Norwalk102-358.pdf](#)

26.29 MB, Fingerprint: 34049835918f6a9c1b9c39269cab9ccd ([What is this?](#))

[TransLetter PhilReptToTribes Norwalk102-358 24APR2019.pdf](#)

153.83 KB, Fingerprint: 29f27f96638bf5e5120f4cb8b07e0298 ([What is this?](#))

[April 2019 Tribal Letter to Initiate Monthly Consultation .pdf](#)

203.65 KB, Fingerprint: f4977b5d0055fb2c6cdedfc7a6e3eea5 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Hansen, Christopher (FHWA) <christopher.hansen@dot.gov>
Sent: Friday, April 21, 2017 3:58 PM
To: James Quinn; Turnbull, Marissa; Max Garcia; Temple University Archaeology; Nekole Alligood
Cc: 'brwnjbb123[REDACTED]'; 'dhnithpc[REDACTED]'; Powell, Eloise (FHWA); McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy
Subject: April 2017 Tribal Consultation
Attachments: MOA_Southbury130-165_ca2014.pdf; RABER ASSOCIATES - DRAFT ARCHAEOLOGICAL DATA RECOVERY REPORT - PROJECT 130-165 - 03-20-17.pdf; 4-04-17 102-358 Draft Purpose and Need Statement_v4.docx

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division



U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

December 28, 2017

628-2 Hebron Avenue
Suite 303
Glastonbury, CT 06033
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HEO-CT

Dear CTDOT Cultural Resources Unit:

The Federal Highway Administration (FHWA) has conducted and concluded tribal consultation for transportation undertakings, as requested by your office. FHWA electronically delivered information about applicable undertakings to Federally-recognized Indian tribes who have an identified area of interest in the project area.

The following undertakings have undergone tribal consultation:

102-358: Route 7/15 Norwalk Project (Norwalk, Fairfield County)

106-128: Interchange 58 Improvements on Rt 15 at Rt 34 (Orange, New Haven County)

110-136: Major Intersection Improvements – Rt 6 at N Main St and Agney Ave (Plymouth, Litchfield County)

144-196: Intersection Improvements on Rt 108 at Silver Ln and Armory Rd (Trumbull and Stratford, Fairfield County)

FHWA received the following response(s) from Indian tribes¹:

Indian Tribe	Response received?	Summary of response
Mohegan Tribe	Yes	State No: 106-128: No adverse effects to historic properties if site is avoided as mentioned. State No: 144-196: No Historic Properties . State No: 110-136: No Historic Properties
Mashantucket Pequot Tribal Nation	No	

¹ Original responses are attached to this document

Narragansett Indian Tribe	No	
Delaware Tribe of Indians	No	
Delaware Nation	Yes	No concerns
Stockbridge Munsee Community	Yes	SPN 110-136 is not in the Tribe's area of interest

With this letter, Tribal consultation is concluded for the undertakings identified herein. Please work with our office to resolve any substantive comments provided by Tribes. FHWA appreciates your continued cooperation in tracking Tribal consultation outcomes and your assistance in ensuring that commitments made to Tribes are met. If you have any questions, please contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov

Sincerely,

Chris Hansen
Environmental Protection Specialist
FHWA Connecticut Division

From: Hansen, Christopher (FHWA) <christopher.hansen@dot.gov>
Sent: Monday, May 22, 2017 6:26 PM
To: McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy
Cc: Powell, Eloise (FHWA)
Subject: FW: April 2017 Tribal Consultation
Attachments: 0174-0405 Dist4 TribalConsultPackage May2017.pdf

The April 2017 Consultation is complete. I only heard a response from Delaware Nation – please see attached.

Chris

From: Hansen, Christopher (FHWA)
Sent: Friday, April 21, 2017 3:56 PM
To: 'James Quinn'; 'Turnbull, Marissa'; 'Max Garcia'; 'Temple University Archaeology'; 'Nekole Alligood'
Cc: 'brwnjbb123'; 'dhnithpo'; Powell, Eloise (FHWA); 'Mark.McMillan@ct.gov'; 'Speal, Charles S'; 'Ranslow, Mandy'
Subject: April 2017 Tribal Consultation

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division

From: Eloise.Powell@dot.gov [mailto:Eloise.Powell@dot.gov]
Sent: Tuesday, April 05, 2016 5:16 PM
To: Speal, Charles S; McMillan, Mark J.; Ranslow, Mandy; Connecticut.FHWA@dot.gov
Cc: christopher.hansen@dot.gov
Subject: TRIBAL CONSULTATION CONCLUDED: March 2016 Package out for Tribal Consultation is Concluded

Good Afternoon,

The March Tribal Section 106 Coordination Package was sent to all Tribal Nations on March 3, 2016. The due date for their responses back to us was 30-days from this date, which has now past. We only received an official response back from the Mohegan Tribe on March 18, 2016 and the Delaware Tribe on March 11, 2016, which were provided to you on March 21 and March 11, 2016, respectively.

Tribal Consultation is now officially closed for the March 2016 package of projects, other than the few projects which are still under additional consultation.

Please move forward with these projects. If you have any questions, please give me a call.

Thank you,

Eloise

Eloise F. Powell | ***Team Leader for Planning, Environment & Research***

Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

From: [Kimberly Penrod](#)
To: [Hansen, Christopher \(FHWA\)](#)
Cc: [Kimberly Penrod](#)
Subject: RE: April 2017 Tribal Consultation
Date: Wednesday, April 26, 2017 9:17:18 AM

Chris,

Thanks for the update and reaching out to me.

The website is great and very informative. I look forward to working with you on this project.

Here are our main concerns with any project:

1. Keeping a 50-100 ft (at least) area of protection around known sites.
2. Maintaining the buffer area and not allowing heavy equipment to impact these areas.

Compression is an issue of concern for us.

And if something is found, halting all work, contacting us within 48 hours and when work resumes discussion of a monitor if needed.

The protection of our tribal cultural resources and tribal trust resources will take all of us working together.

With the information you have submitted we can concur at present with this proposed plan.

As with any new project, we never know what may come to light until work begins.

The Delaware Nation asks that you keep us up to date on the progress of this project and if any discoveries arise please contact us immediately.

If you need anything additional from me please do not hesitate to contact me.

Respectfully,

Kim Penrod

Delaware Nation

Director, Cultural Resources/106

Archives, Library and Museum

31064 State Highway 281

PO Box 825

Anadarko, OK 73005

(405)-247-2448 Ext. 1403 Office

[REDACTED]

[kpenrod](#) [REDACTED]

From: Hansen, Christopher (FHWA) [mailto:christopher.hansen@dot.gov]

Sent: Tuesday, April 25, 2017 10:52 AM

To: Kimberly Penrod

Cc: Powell, Eloise (FHWA)

Subject: FW: April 2017 Tribal Consultation

Dear Ms. Penrod,

I am looking forward to working with you. Feel free to call or email me or my supervisor Eloise Powell if you ever have questions or concerns on proposed projects or the FHWA program in Connecticut.

Thank you,
Chris

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

From: Nekole Alligood [mailto:NAlligood [REDACTED]]

Sent: Tuesday, April 25, 2017 8:57 AM

To: Hansen, Christopher (FHWA)

Subject: RE: April 2017 Tribal Consultation

Good morning, please send all future information on projects to Kim Penrod at [kpenrod \[REDACTED\]](mailto:kpenrod [REDACTED]) I am no longer performing 106 reviews for the Delaware Nation. I have forwarded this message on to her.

Thank you,
Nekole

From: Hansen, Christopher (FHWA) [mailto:christopher.hansen@dot.gov]

Sent: Friday, April 21, 2017 2:58 PM

To: James Quinn; Turnbull, Marissa; Max Garcia; Temple University Archaeology; Nekole Alligood

Cc: 'brwnjbb123 [REDACTED]'; 'dhnithpo [REDACTED]'; Powell, Eloise (FHWA); Mark.McMillan@ct.gov; Speal, Charles S; Ranslow, Mandy

Subject: April 2017 Tribal Consultation

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division



Delaware Tribe Historic Preservation Representatives
P.O. Box 64
Pocono Lake, PA 18347
temple@delawaretribe.org

March 11, 2016

Federal Highway Administration
Connecticut Division Office
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033
Att: Eloise Powell

RE: March 2016 Tribal Consultation Package

Dear Ms. Powell,

Thank you for notifying the Delaware Tribe of the projects in Connecticut. Please see the comments below regarding the Delaware Tribe interests in each project.

- State Project 78-TBD: Replacement of Bridge #05650 South Main Street #1 over Fawn Brook-Marlborough, Connecticut – **No objection to the project.**
- State Project 102-358: Route 7 / 15 Interchange Improvement Project, Norwalk, Connecticut – **We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 131-203: Farmington Canal Heritage Trail – Southington, Connecticut- **No objection to the project.**
- State Project 155-171: Safety and Capacity Improvements on I-84 – West Hartford, Connecticut – **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 167-108: Rehabilitation of Heroes Tunnel (Bridge #00773), Route 15 through West Rock Ridge- Woodbridge / New Haven – **We concur with the Office of Environmental Planning's finding and we look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**

- State Project 170-3346: Roadway Weather Information System Implementation, Statewide - **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 174-392: Installation of Traffic Control Signals – District 4, Connecticut - **No objection to the project.**
- State Project 174-400: Installation of Traffic Control Signals in District 4 – Various, Connecticut - **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**

We respectfully request additional project details on the projects indicated above so that we may determine the potential impacts to resources of cultural and religious significance to the Delaware Tribe. Thank you for your cooperation. If you have any questions, feel free to contact this office by phone at (610) 761-7452 or by e-mail at temple@delawaretribe.org.

Sincerely,

A handwritten signature in black ink on a light-colored, textured background. The signature appears to be 'Susan Bachor' written in a cursive, flowing style.

Susan Bachor
Delaware Tribe Historic Preservation Representative

From: Eloise.Powell@dot.gov
Sent: Monday, March 21, 2016 9:30 AM
To: Speal, Charles S; McMillan, Mark J.
Cc: Ranslow, Mandy
Subject: FW: Mohegan Response for February/March Tribal Consultation Package

FYI and use.

Thanks, Eloise



Eloise F. Powell | *Team Leader for Planning, Environment & Research*

Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

From: James Quinn [<mailto:jquinn>] [REDACTED]
Sent: Friday, March 18, 2016 3:07 PM
To: Powell, Eloise (FHWA)
Cc: Autumn Cholewa
Subject: Tribal Consultation Package

Hello Eloise,

I have reviewed the latest tribal consultation package you recently sent my office. Please see my comments below:

- State Project # 174-400: In the recommendations, OEP suggests needing to see preliminary design plans before advancing 106. I concur with that approach and request the new design plans for review when available in order to make a more informed decision.
- State Project #170-3346: The recommendations state that any impacts to cultural resources will be managed through design. Can you please provide my office with those designs when available?
- State Project #167-108: I support the recommendation for a Phase I archaeological survey of the APE due to the potential new ground disturbance in the area determined by OEP to have been historically undeveloped. Please send along any archaeological reports that may result of this recommendation.
- State Project #102-358: Please send any relevant information regarding the proposed re-evaluation effort.

Please note No Properties for the following:

- State Project # 155-171

- State Project # 131-203
- State Project #78-TBD
- State Project #174-392

Thank you for the opportunity to review the above projects. Please feel free to contact me with any question you may have regarding the above.

Best regards,
James

James Quinn
The Mohegan Tribe
Mohegan Tribal Historic Preservation Officer & Archaeology Department Manager
13 Crow Hill Rd.
Uncasville, CT
Office: 860-862-6893
Cell: 860-367-1573

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:52 PM
To: Connecticut.FHWA@dot.gov; Alexander, Mark W
Cc: McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy;
christopher.hansen@dot.gov
Subject: March 2016 Section 106 Tribal Consultation
Attachments: Section 106 Tribal Consultation Package-CT DOT, March 2016; March 2016
Section 106 Tribal Consultation Package; March 2016 Section 106 Tribal
Consultation Package; March 2016 Section 106 Tribal Consultation Package;
March 2016, Section 106 Tribal Consultation

For your records, the March 2016 Section 106 Tribal Consultation was sent to the 5 Tribal Nations today, March 3, 2016. The 30-day comment period starts today.

If you have any questions, please give me a call.

Thanks, Eloise



Eloise F. Powell | Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 11:57 AM
To: jqinn@moheganmail.com
Subject: Section 106 Tribal Consultation Package-CT DOT, March 2016

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi James,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. This is the first time I've attached "folders," so please let me know if the folders actually contain the individual project files. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[James Quinn MT THPO Section 106 Consultation 03 03 16 .pdf](#)

544.36 KB, Fingerprint: f9c92b99ec368eb84df010b1d5e01450 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 763869bfde7f5df0b243752b1076e5f1 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 3860f50373fa0affb95d738080b91a7d ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: 969dfc7b7a406fe7b9fc713a1e209261 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 1132cc1e9e249cb0cc1f7b944103f3c9 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: f26a84437b2680e5ff989748a80bfa68 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 4c062430d2a01f00abea5d5d514223a4 ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 4ba00b245cae0fd16dc9a6366d7134a9 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 0a8df404e91b4236d44ef74c04555184 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:08 PM
To: mturnbull@mptn-nsn.gov
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Marissa,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Marissa Turnbull MP THPO Section 106 Consultation 03 03 16.pdf](#)

548.33 KB, Fingerprint: b609c6f40458ea5baebffdddf198cf29 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 4c8580c2cc933221a358938a340cf922 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 903ff48207ff881a268cf2558a1f5d18 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: afa24e2c3ec0e1ed6166486fede15f88 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 90dd52332f1d8239fafdb1b72ff46345 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: cb24b64a182e4e9449c21702fe5a985e ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: e2f33582ccd80ad4fd4e12179feb78ac ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 7a425199d52303a68132113d8dd60434 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 72c10808c7a394261d75e892f7c5077f ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:19 PM
To: temple@delawaretribe.org
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Susan,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Susan Bachor DT THPO Section 106 Consultation 03 03 16.pdf](#)

552.55 KB, Fingerprint: 96704fc7cfdbba86652a0267d8d6f36e ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 97431ea15e72ddc1ebcdc450129ea6b9 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 49a7f324b70d9742c22f28f7ed7c22a9 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: e02ab4236c140e51457de76fb04c7d77 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 36f840813d87ea897781acdc20ed1968 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: ad0dc3c2830894eeff5c44d1db0518c8 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 9693d9ab1cb2141b7b44620d613db210 ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 2322b9953cfa56ce01d4e4d8c4953b07 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 8042f1f80b8b888255b565f9f1e79d5c ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:34 PM
To: nalligood [REDACTED]
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Nekole,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Nekole Alligood DN THPO Section 106 Consultation 03 03 16.pdf](#)

559.85 KB, Fingerprint: ab7e18d59c28e4d673d851c44dbc7d77 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 1866237775deaa019560837aaa24d7f2 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: bf256c037d3a105cc101ea9afe55efc9 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: d7a5eb0b3429b9cfc6b719880001ebc7 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: e3096efbdca8e1fedf7e7b0a8ba677e7 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: 46bcee69979dea47c934519798aa9f45 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: e7340d648d665155dfae4483c42a9dea ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 0f0ac450e66fca1ed9d4e56979c5493c ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 0291f8ae68b2870367e04aa3ec96fbca ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:48 PM
To: dhnthp[REDACTED]
Subject: March 2016, Section 106 Tribal Consultation

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi John/Doug,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[John Brown NT THPO Section 106 Consultation 03 03 16.pdf](#)

482.57 KB, Fingerprint: f77235d3aa5a8164882d42a60f82cfde ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 295ee86dbee47e58516c53caf067e62e ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 8d545db96e6f3589101d985ba5b70d9b ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: 5fd056b670d15358a03006caa339666b ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: e6264900234a3246b3525d86484c6c50 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: 76c76c4a6f3f5514e7d6a5cbb656ed58 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 004e3988645d69f14d4e4f76b3064873 ([What is this?](#))

[174-392.zip](#)

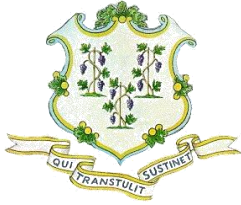
12.67 MB, Fingerprint: 0206557d629557c5059b63964df7fc9a ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: bc225231949bc46c31407aaf275cf5c6 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)



STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546



Transmittal:

From:	C. Scott Speal	Date: February 16, 2016
Through:	Mark W. Alexander	
To:	Michelle Herrell	
	Environmental Protection Specialist, FHWA	

Project:	State No.:	102-358
	F.A.P. No.:	NH-7(122)
	Project Title:	Route 7 / 15 Interchange Improvement Project
	Town:	Norwalk

Subject:	Tribal Consultation Documentation
-----------------	-----------------------------------

Abstract:

The Connecticut Department of Transportation (CTDOT), with financial assistance from the Federal Highway Administration (FHWA), proposes improvements to the interchange between Route 7 and Route 15 in the City of Norwalk. The project would involve reconfiguration of the Main Avenue intersection and add access ramps and alternative routing of traffic between the Merritt Parkway, Grist Mill Road and Route 7. CTDOT has tasked a cultural resource firm to investigate the full impact of the undertaking on historic properties within the project area of potential effect (APE). No formal recommendation will be advanced on this undertaking until more information is available through the environmental re-evaluation effort and renewed consultation, though the expectation is that the project will ultimately have an adverse effect on historic properties.

Description of Activity:

The Route 7/15 Interchange Improvement Project has been studied extensively since the 1950's as part of proposed improvements to the Route 7 corridor. In the early 1990's, a strategic financial analysis recommended that the existing Route 7 interchange with the Merritt Parkway be completed to provide full freeway to parkway service.

Regionally, Route 7 serves as an important north-south transportation corridor connecting Interstate I-84 in Danbury with many residential communities, Norwalk, I-95 and the Merritt Parkway. The current interchange of Route 7 Freeway and Route 15 provides connections only between Expressway 7 and Route 15 to and from the West, with no connection to and from the east. Travelers going to Norwalk from the east or *vice versa* must use the Main Avenue interchange. This places a heavy demand on Main Avenue, a four lane arterial which carries high traffic volumes to and from extensive roadside commercial and office development. During peak hours there is extensive queuing due to the combined high traffic volumes, poor roadway geometry at the interchange and inadequate traffic controls at the intersection of Main Avenue and Glover Avenue/Creeping Hemlock Drive. The overall result has been congestion, time delay and accidents along Main Avenue. The proposed interchange improvement project would reconfigure the Main Avenue intersection, add much needed access ramps and provide alternative routing of traffic between the Merritt Parkway, Grist Mill Road and Route 7. By increasing intersection capacity and reducing through traffic volumes at Creeping Hemlock Drive, the interchange improvements would result in substantial improvements to the safety and smooth flow of traffic in the area.

In the interest of compliance with Section 106 of the National Historic Preservation Act, the National Environmental Policy Act, and other relevant State and Federal cultural resource laws and directives, the CTDOT Office of Environmental Planning (OEP) and FHWA request your review and commentary on this project with regard to any Native concerns within or in immediate proximity to the project area.

Potentially Affected Resources:

The potential effects of this undertaking on historic properties have been under study since the 1990's, with a memorandum of agreement (MOA) for anticipated adverse effects having been initially developed in 1999 and then amended in 2004. The historic properties understood to be adversely affected by the project at that time included the Merritt Parkway and the Glover Avenue Bridge, both listed upon the National Register of Historic Places (NRHP). It was also recognized in the MOA that archaeological resources may be present, but their nature had not been fully investigated at that time.

Archaeological surveys conducted by the Public Archaeological Survey Team, Inc. (PAST) in 2000 identified four archaeological sites that appeared to be eligible for the NRHP¹. In the subsequent Phase II testing, two of these sites 161-23, a post-European contact homestead and midden, and 103-49, a prehistoric multi-component encampment, were determined to be NRHP-eligible. Phase III

¹ *Phase I and II Archaeology Surveys, Route 7/15 Interchange Improvements and Route 7 Corridor Improvements, State Projects Nos. 102-269 and 102-305.* Archaeological and Historical Services Inc. (2007), CHPC no. 1580.

data recovery work was undertaken at Site 103-49 when it was determined that there was no prudent and feasible means to avoid it in project construction².

Given the time that has transpired since the previous environmental studies, the project proponents have hired Archaeological and Historical Services, Inc. to perform a comprehensive cultural resources re-evaluation of the project.

Recommendations:

No formal recommendation will be advanced on this undertaking until more information is available through the re-evaluation effort, though the expectation is that the project will ultimately have adverse effects on historic properties, including State Archaeological Site 103-49 and the Glover Avenue Bridge, at minimum. We also request, however, any insight you may be able to provide with regard to Native concerns within or in immediate proximity to this proposed project. It is our continuing pleasure to work with you regarding the protection of Connecticut's Native American cultural heritage. We thank you for your time and input.

Attached Documents:

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | CTDOT Environmental Review Request Form and Supporting Documents |
| <input checked="" type="checkbox"/> | Historic Properties Review Map |
| <input checked="" type="checkbox"/> | Design Plan Norwalk 102-358 |
| <input checked="" type="checkbox"/> | Cultural Resources SOW – AHS, Inc. |

² *Phase III Data Recovery at Site 103-49, Route 7/15 Interchange, State Project No. 102-269*, Archaeological and Historical Services Inc. (2005), CHPC no. 1370.

From: [Holland, Emilie \(FHWA\)](#)
To: ["McMillan, Mark J."](#)
Cc: ["Carifa, Kevin F"; Salmoiraghi, Kurt \(FHWA\)](#)
Subject: Tribal Consultation MPTN Response for SPN 0102-0358 Norwalk
Date: Monday, August 2, 2021 3:43:00 PM
Attachments: [CT-FHWA 102-358 Merritt Pkwy Project.pdf](#)

Mark,

FHWA has received the attached response from the Mashantucket Pequot Tribal Nation's THPO regarding SPN 0102-0358.

We should plan to spend some time discussing the comments & when we meet tomorrow.

-Emilie

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 628-2 Hebron Avenue – Suite 303, Glastonbury, CT 06033

Correspondence from the
Mashantucket Pequot Tribal Nation
July 29, 2021



Mashantucket (Western) Pequot Tribe
Tribal Historic Preservation Office
110 Pequot Trail.
P.O. Box 3180
Mashantucket, CT 06338-3180

Date: 07/29/21

Re: Norwalk CT/FHWA 102-358 Merritt Pkwy Project

Dear Emilie,

Would you please let this document serve as our formal comments regarding the Norwalk 102-358 Merritt Parkway project under NEPA and NHPA section 106 review? Our review considers our internal research of the APE comparing cultural interests of the Mashantucket Western Pequot Tribe and the archaeology summary provided by the Archaeological Historical Services of Storrs, CT. (AHS)

Figure 14 of the AHS survey report shows the vicinity of the project illustrated on the 1930 Griswold and Spiess reconstructed map of Native American trails, villages, and sachemdoms, circa 1625 Connecticut. The Mashantucket Pequot Office of Tribal Historic Preservation does not recognize the Griswold/ Spiess Map as an accurate depiction of Indigenous territories or the place names. Early colonist's perception of Indigenous people was wildly inaccurate, particularly their writings reflecting what they believed to be our words and identification. The map has also never been endorsed by Connecticut's State and Federally recognized tribes for these reasons. Therefore, references to this map in the AHS survey, such as Chapter **V**, subsection **b**. "*Early English Settlement*" is unfortunately flawed

MPTN Recommendation:

Reflect in the document that CT DOT and FHWA recognize that the AHS historical context is incomplete without a federally recognized tribal perspective on the historic conclusions drawn that are connected to this project. MPTN feels that the summary is a public-facing document and this additional perspective needs to be communicated.

D3. Phase II Intensive Archaeological Survey:

AHS has stated:

"In order to determine whether any of the archaeological sites identified in Phase IB survey were eligible for listing in the NRHP, Phase II Intensive testing of each site was undertaken. Shovel test pits and larger test units were excavated across the sites to collect sufficient data to establish the sites' age, function, integrity, and spatial parameters. This information was used to permit a conclusive determination of NRHP eligibility to be made."

Eight Pre-Colonial Native American and two late historical-period sites were identified in the survey. The Pre-Colonial sites were assessed as potentially NRHP-eligible; the historical-period sites were not considered eligible.”

MPTN Recommendations:

Pursuit of the Pre-Colonial archaeological site listings in the NRHP should be pursued. If achieved, it will require more scrutiny of any further design work of the historic Merritt Parkway.

III. ARCHAEOLOGICAL CONTEXT

B. Environmental Assessment of Archaeological Sensitivity

The cultural resources survey states:

“The information gathered during the archaeological survey of the APE must be interpreted in the broader context of the culture, history, and environment of southern New England. The subsistence and settlement patterns of Pre-Colonial peoples were closely tied to the natural environment.

Their lifeways were based on the types, abundance, and location of edible and otherwise useful natural resources. The settlement and subsistence patterns of Pre-Colonial Native people are therefore best understood in an environmental and ecological context.”

MPTN Response & Recommendation:

The Mashantucket Pequot Tribal Historic Preservation Office recommends CT DOT and FHWA engage with Federally recognized tribes early and invite them to participate in the archaeological field survey and research processes. Doing so would allow tribes to contribute historical information during the research phase of a project. Further, this would enable tribes to submit their narratives about their histories, thereby elevating and enhancing historical accuracies. Additionally, tribal representatives can comment directly on artifacts located during testing phases during the field survey work. MPTN THPO policy is to document finds but leaves the material in the ground. Data recovery should only be considered in the condition of the imminent destruction of a historic site which should undergo deep scrutiny.

IV. ARCHAEOLOGICAL SURVEY RESULTS

A. Phase IA Assessment

“Despite the presence of visible disturbance related to the construction of roads and buildings in the Project Site, seven discrete areas of intact soils were identified during the walkover and soil-probe survey. Several archaeologically sensitive landforms are present in these discrete areas, as are unaltered landscapes, which are all indicative of archaeologically sensitive areas.

(Disturbed areas are not considered archaeologically sensitive because any buried sites in these contexts have compromised integrity and thus cannot qualify for listing in the NRHP.)

These sensitive areas were assessed as having moderate to high archaeological potential for both Pre- Colonial Native American sites and historical-period sites. All of the sensitive areas are characterized by unaltered landscapes, topographic continuity with unaltered landscapes, or close spatial association with natural and cultural features that are archaeologically sensitive. Each of these areas also preserved intact soil development sequences.”

MPTN Comment:

We consider Archaeology as a science tool to help all people learn about the past. However, in terms of the history of the Mashantucket Western Pequot tribe, it is not for archaeologists to interpret our past for us. More broadly, the archaeological evidence of the existence of indigenous peoples cannot be understated. Therefore we support any action which would result in the preservation of any sites that contain that evidence. We state again; the MPTN THPO policy is to document finds and leave the material in the ground. We have specific cultural and spiritual reasons for this.

Data recovery should only be considered in the condition of the imminent destruction of a historic site. AHS, who has been granted authority over this site, has chosen to remove some materials in the APE. If the survey completed has yielded evidence of indigenous presence (i.e., pre-colonial Native American sites), any project alternative supporting the site’s preservation should be prioritized.

However, we would like to request that any remaining materials that have not yet been recovered be left in place. If a decision has been made to destroy these sites to build out the APE area, we would ask that AHS invite both federally recognized and state-recognized tribes to inspect the recovered items for cultural connection and potentially repatriation.

B. Phase IB Archaeological Reconnaissance Survey

In this aspect of the survey, the stated purpose of the Phase IB survey was to determine whether buried archaeological sites are present in the Project Site. (the APE)

AHS has reported:

“Based on the data recovered from 220 shovel test pits in the Phase IB survey, 10 sites were identified in the Project Site: eight Pre-Colonial Native American sites and two historical-period sites (see Table 1). The two historical-period sites are late-period refuse areas that are insignificant. The eight Pre-Colonial sites were considered potentially eligible for listing in the NRHP, thus Phase II Intensive Survey was recommended. Four of the sites produced diagnostic (i.e., datable) artifacts, placing them primarily in the Archaic Period.”

MPTN Comments:

We concur with the process and methodology that was followed up until the point of data recovery once Indigenous occupation was determined.

D. Anticipated Impacts/Effects to NRHP-Eligible Archaeological Sites

AHS Further Reports:

“At the current conceptual stage of design development, the general alignment and footprint of the proposed alternatives are known but have not been finalized (Figures 4-10). As design development proceeds, more precise layout locations and dimensions of improvements will allow a more accurate assessment of effects to archaeological resources.”

MPTN Comment:

We concur with this analysis. However, we reserve the right to providing additional comments once the alternatives are reduced and designs are further refined.

VII. CONCLUSIONS AND RECOMMENDATIONS

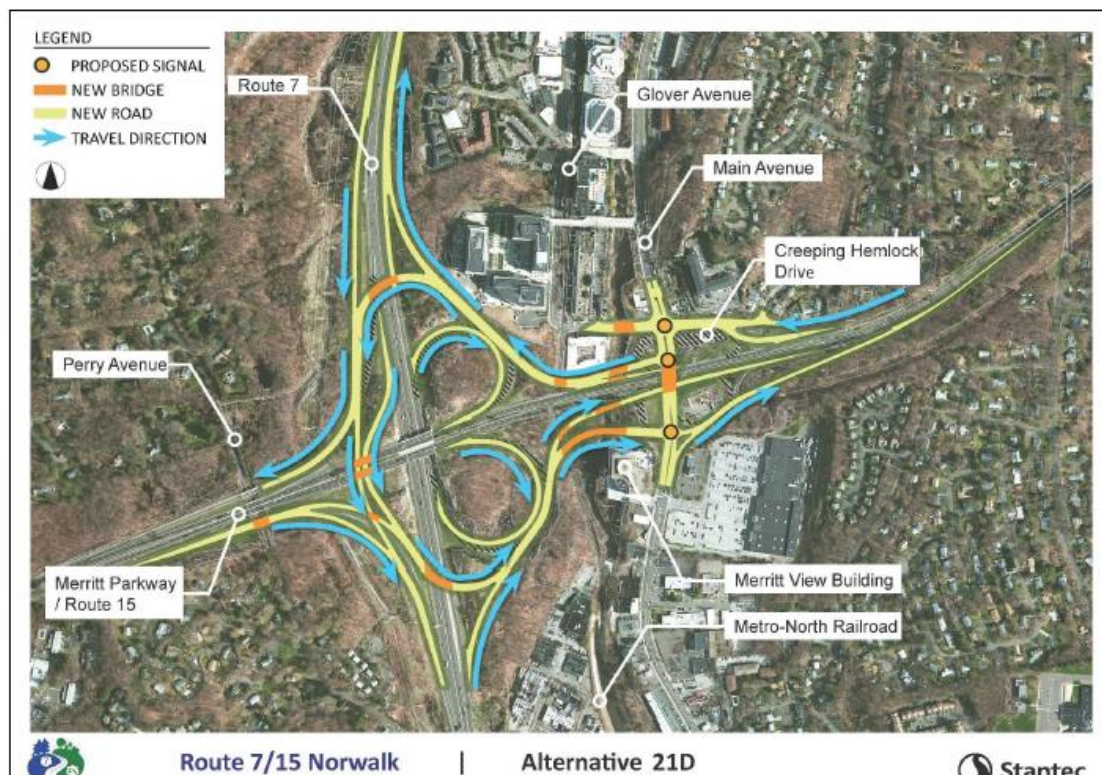
MPTN Final Comments as presented in the presented alternatives presented in Lucas A. Karmazinas document dated September 22, 2020:

The MPTN Tribal Historic Preservation Office has no formal comments on the likely adverse visual effects of the proposed alternatives, particularly alternative 12A.

Alternative 21D is expected to have no effect on archaeological sites and resources. Therefore, as presented, this would be the preferred alternative of the Mashantucket Western Pequot Tribe.

If there will be any additional alternatives that also avoids historic indigenous sites, we would like to review those as well.

Map of preferred alternative:



We thank the CT DOT and FHWA for the opportunity to review and comment on this project.
We look forward to any future updates.

Thank You!

Sincerely,

Michael Kickingbear Johnson
Deputy Tribal Historic Preservation Officer

CC: Marissa Turnbull

Correspondence with CT SHPO re: Merritt
Parkway Landscape Assessment Guidelines
May 2021

From: McMillan, Mark J.
Sent: Wednesday, May 26, 2021 5:08 PM
To: Scofield, Jenny; Kinney, Jonathan
Subject: RE: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Thanks Jenny,

As far as timing between the two efforts, I can only hazard a ballpark estimate. The EA/EIE document is scheduled to be completed in the coming months. There are some outstanding issues created by the COVID pause in tribal consultation that is impacting both the NEPA and Section 106 process timelines. With that in mind, "by the end of 2021" is a safe estimate for EA/EIE.

While there are plans to update the MP Landscape Guide, I'm not aware of any particular deadlines or schedules for this work, so I can't have a point of comparison. "Not within 2021" is my best estimate for work on updating the Landscape Guide.

I agree that the attached guidelines are not (and were not intended) to be mitigation. I included them to provide context to those future discussions about the Merritt Parkway landscape and what character-defining features were identified through our research and consultation with the PAC subcommittee and public. Any mitigation efforts will be developed in consultation with your office and memorialized in an MOA.

Thanks again,

Mark

From: Scofield, Jenny <Jenny.Scofield@ct.gov>
Sent: Wednesday, May 26, 2021 3:32 PM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Subject: RE: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Hi Mark,

I understand that the Merritt Parkway Landscape Guide will not be updated before construction starts; my question about that at the last meeting was just to understand the timing of the two efforts.

I think it's helpful to attach the guidelines you have; we can review those as part of the EA. However I don't think the guidelines are mitigation.

Thanks,

Jenny

Jenny Fields Scofield, AICP, National Register & Architectural Survey Coordinator
State Historic Preservation Office

Department of Economic and Community Development (DECD)
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
Phone: 860-500-2343



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).

Follow us on Twitter 

Like us on Facebook 

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, May 4, 2021 11:08 AM
To: Scofield, Jenny <Jenny.Scofield@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Subject: Route 7/15 Interchange and Merritt Parkway Landscape Plan

Good morning Jonathan, Jenny,

I'm just following up on getting all my correspondence ducks in a row. You had posed a question of whether updated Landscape Guidelines for the Merritt Parkway were anticipated to be completed before the EA/EIE (presumably FONSI) was finalized. The answer is no; the update to the 1994 Merritt Parkway Landscape Guide is still a work in progress.

However, specific to this project, a stand-alone study "Merritt Parkway Landscape Assessment Guidelines" was developed to be used both as a tool for evaluating the project's alternatives impacts under NEPA and as a means for guiding design decisions with regard to the landscaping aspect of the Merritt Parkway within the project area. The referenced Guidelines are appended in the EA/EIE document that is currently being finalized. The Guidelines identify character-defining features of the Merritt Parkway and recommend measures to be incorporated into the project design. We are proposing that CTDOT will submit final design documents to CTSHPO for your review as a potential mitigation measure under Section 106.

I wanted to confirm that this is acceptable to your office. Would you mind providing comments to this so that I can document our agencies' coordination on this matter?

Thank you,

Mark




I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner

Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
 (860) 594-2135
 (860) 594-3028 - *Fax*
 mark.mcmillan@ct.gov

Correspondence from The Delaware Nation
via FHWA

January 20, 2021

From: Holland, Emilie (FHWA) <emilie.holland@dot.gov>
Sent: Wednesday, January 20, 2021 8:07 AM
To: McMillan, Mark J.
Cc: Speal, Charles S; Carifa, Kevin F; Salmoiraghi, Kurt (FHWA)
Subject: September 2020 - Tribal Consultation
Attachments: Route 7 Route 15 Interchange Project.pdf

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello Mark,

Please see the attached response received from The Delaware Nation regarding project 0102-0358 – Rt 7 & 15 Interchange, in Norwalk. This is the Merritt Parkway project with an Environmental Assessment under development. The project was sent for consultation in September 2020. This project has been subject to the ACHP recognized pause in Section 106 consultation.

Please note that the Delaware Nation has indicated their intent to participate in consultation on this project.

Consultation for all of the September projects, including this one, remains ongoing at this time.

Thank you,

-Emilie

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
[Connecticut Division](#) | 628-2 Hebron Avenue – Suite 303, Glastonbury, CT 06033

From: emilie.holland@dot.gov
Sent: Wednesday, September 23, 2020 8:42 PM
To: jquinn[REDACTED]; acholewa[REDACTED];
mturnbull@mptn-nsn.gov; mejohnson@mptn-nsn.gov;
maxbrowngarcia[REDACTED]; brwnjbb123[REDACTED]
Cc: Speal, Charles S; Karmazinas, Lucas; McMillan, Mark J.; Lesay, Kimberly C;
kurt.salmoiraghi@dot.gov
Subject: September 2020 - FHWA CT Consultation (Statewide)

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

You have received 4 secure files from Emilie.holland@dot.gov.

Use the secure links below to download.

Dear Tribal Representatives,

Please see consultation documents attached.

Thank You,

-Emilie

M. Emilie Holland | emilie.holland@dot.gov | 860-494-7577
Environmental Protection Specialist | Federal Highway Administration
Connecticut Division | 628-2 Hebron Avenue – Suite 303, Glastonbury, CT 06033

Secure File Downloads:

Available until: **23 October 2020**

Click links to download:

[September 2020 Tribal Letter to Initiate Monthly Consultation statewide.pdf](#)

227.30 KB, Fingerprint: 214866bfc74555504f24ba7611b0de45 ([What is this?](#))

[Granby 55-144 ConsultLetterToTribes 20200916.pdf](#)

8.86 MB, Fingerprint: 2b473f4a83b4b9a025c47cc972111dbe ([What is this?](#))

[Letter §106-Evaluation Westport158-214 20200901.pdf](#)

5.22 MB, Fingerprint: a48557337a577efcacbd651814d12ad9 ([What is this?](#))

[LETTER toFHWA Tribal-Consultation Norwalk 102-358 20200922 wAppendicies.pdf](#)

67.23 MB, Fingerprint: da9a9d47238f41dc9d59b38c11e5664c ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

January 19, 2021

To Whom It May Concern:

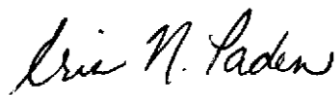
The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

**Project(s): Route 7/Route 15 Interchange Project
 State Project No. 102-358
 Norwalk, Connecticut**

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter during and prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger any known cultural, or religious sites of interest to the Delaware Nation. However, there is still the potential for the discovery of unknown resources. We would like to accept your invitation for consultation.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Historic Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405-247-2448 ext. 1403.



Erin Paden
Director of Historic Preservation
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
Ph. 405-247-2448 ext. 1403
epaden@delawarenation-nsn.gov

Correspondence with CT SHPO re: Section
106 Consultation Meeting #3
December 2020

From: Kinney, Jonathan
Sent: Tuesday, December 22, 2020 5:48 PM
To: Eberle, John; Elizabeth Merritt; Sarah Stokely; Scofield, Jenny; Labadia, Catherine; Holland, Emilie (FHWA)
Cc: McMillan, Mark J.; Antoniak, Yolanda M; Fesenmeyer, Andy A.; Ken Livingston
Subject: RE: 7-15 Interchange Visual Assessments

Good afternoon John. That date and time works for me. Thank you. Happy Holidays!

Jonathan Kinney
Director of Operations
Deputy State Historic Preservation Officer

Connecticut State Historic Preservation Office
Department of Economic & Community Development
State of Connecticut
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
O: 860.500.2380
Jonathan.kinney@ct.gov



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).
Follow us on:



From: Eberle, John <John.Eberle@stantec.com>
Sent: Monday, December 21, 2020 2:35 PM
To: Elizabeth Merritt <emerritt@savingplaces.org>; Sarah Stokely <sstokely@achp.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Holland, Emilie (FHWA) <emilie.holland@dot.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>
Cc: McMillan, Mark J. <Mark.McMillan@ct.gov>; Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Ken Livingston <klivingston@fhiplan.com>
Subject: 7-15 Interchange Visual Assessments

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello all:

As a follow-up to some recent correspondences between the various parties on this distribution, we are hoping to schedule a MS Teams meeting/session where we can review the 7-15 Interchange project with you and specifically visual elements and 3D visualization models that will give all perhaps a clearer view of the two (2) current alternatives (21D and 26) under consideration and how they might be expected to impact the Merritt Parkway.

Beyond this general review, if there are any specific agenda items anyone would like to see added, please let us know as we prepare for the meeting to assure we address.

As I don't have access to all calendars (except CTDOT), I am hoping we can try and slot a meeting in for early to mid-January. Please let me know any blackout dates not available and I'll begin herding the cats!

Right now it looks like Jan 15th , 10 AM-11:30 might be a good time. Let me know.

Happy Holidays all!

John

John F. Eberle PE, LEED AP ND
Principal

Direct: 203-495-1645 ext 7036

Fax: 203-495-1652

john.eberle@stantec.com

Stantec

55 Church Street Suite 601

New Haven CT 06510-3014



The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

CT SHPO Project Review Letter
November 20, 2020

From: Kinney, Jonathan
Sent: Friday, November 20, 2020 3:59 PM
To: Karmazinas, Lucas; McMillan, Mark J.
Cc: Labadia, Catherine; Scofield, Jenny
Subject: Route 15/Route7 Interchange - Norwalk Review Letter
Attachments: 106_Route 715 Interchange_Norwalk_DOT_AE_20Nov2020.pdf

Good afternoon Lucas/Mark,

Please see our attached review letter for the Route 15/Route 7 Interchange project. Feel free to reach out with any questions you may have. Thank you and have a great weekend.

Jonathan Kinney
Director of Operations
Deputy State Historic Preservation Officer

Connecticut State Historic Preservation Office
Department of Economic & Community Development
State of Connecticut
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
O: 860.500.2380
Jonathan.kinney@ct.gov



Get all the SHPO news and events! Sign up for our monthly [newsletter](#).

Follow us on:



November 20, 2020

Mr. Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
(via email only to lucas.karmazinas@ct.gov)

Subject: Route 7 / Route 15 Interchange Project
City of Norwalk, Connecticut
State Project # 102-358

Dear Mr. Karmazinas,

The Connecticut State Historic Preservation Office (SHPO) is in receipt of your request for our comments concerning the above-referenced project and potential effects to historic properties. In addition to your September 21, 2020 letter, SHPO is also in receipt of the Public Report – Phase I and II Cultural Resources Surveys prepared for Stantec by Archaeological and Historical Services, Inc. and the accompanying Visual Impact Assessment report.

SHPO understands that the Connecticut Department of Transportation (CTDOT) plans on using a combination of state and federal funding to address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in the City of Norwalk. As a result of the use of federal funding, the project is subject to review pursuant to Section 106 of the National Historic Preservation Act. Concurrent with the Section 106 evaluation, an Environmental Assessment/Environmental Impact Evaluation (EA/EIE) document is being prepared to analyze the broader environmental impacts of the proposed undertaking in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

This office appreciates the opportunity to comment on the proposed project at this early stage of the environmental review process. During the initial alternatives assessment process, CTDOT screened 26 alternatives based on the ability for each one to meet the project's purpose and need. As a result of this screening process, CTDOT has eliminated 23 of these alternatives from further consideration. The remaining 3 alternatives being advanced are No Build, Alternative 21D, and Alternative 26.

SHPO concurs with the preliminary Area of Potential Effect (APE) defined in your letter and the submitted cultural resources survey report. Upon selection of a preferred alternative and the further progression of project design, the SHPO looks forward to additional consultation to refine the APE if necessary. As stated in your letter and the cultural resources survey report, a number of previously identified historic resources are located within the currently delineated APE:

- The Merritt Parkway Historic District was listed on the National Register of Historic Places in 1991 under Criteria A and C. In addition to the roadway and landscape features that contribute to the historic district, five contributing bridges are also located within the APE:
 - Perry Avenue Bridge (Bridge No. 00719)
 - Metro-North Railroad Bridge (Bridge No. 00720)
 - Norwalk River Bridge (Bridge No. 00721)
 - Main Avenue Bridges (Bridge No. 00530A and 00530B)
 - West Rocks Road Bridge (Bridge No. 00722)
- The Verneur Pratt Historic District, located at 114-116 Perry Avenue, was listed on the National Register of Historic Places in 2011.
- The Glover Avenue Bridge (Bridge No. 04155) was determined eligible for the National Register of Historic Places by the SHPO in 1991.
- Connecticut Archaeological Site 103-57 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.
- Connecticut Archaeological Site 103-58/60 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.
- Connecticut Archaeological Site 103-61/62 was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.

CTDOT also has identified several properties within the APE as potentially eligible for listing on the National Register of Historic Places:

- 2 Singing Woods Road
- 129 Perry Avenue
- Metro-North Norwalk River bridge (Bridge No. 8202R)

As the project design evolves and a preferred alternative is selected, additional information about these resources may be required in order to conduct a formal eligibility evaluation as part of the ongoing consultative process.

Should CTDOT proceed with either build alternative as currently designed, Alternative 21D or Alternative 26, the undertaking will constitute an adverse effect upon historic properties. Both build alternatives will result in the demolition and replacement of historic bridges and alterations to the Merritt Parkway that will diminish the district's integrity as well as other potential impacts to historic resources within the APE. SHPO looks forward to continuing consultation with CTDOT and the additional consulting parties to avoid, minimize, or mitigate the effects of the proposed undertaking as it progresses.

This office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the National Environmental Policy Act, the Connecticut Environmental Policy Act, and Section 106 of the National Historic Preservation Act, as amended. For additional information, please contact Jonathan Kinney at (860) 500-2380 or Jonathan.kinney@ct.gov.

Sincerely,

A handwritten signature in blue ink, reading "Jonathan Kinney". The signature is fluid and cursive, with the first name "Jonathan" being more prominent than the last name "Kinney".

Jonathan Kinney
Deputy State Historic Preservation Officer

Cc: Mark McMillan – CTDOT (*via email only to* mark.mcmillan@ct.gov)

FHWA response to ACHP
10/28/2020



U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

October 28, 2020

628-2 Hebron Avenue
Suite 303
Glastonbury, CT 06033
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HEO-CT

Jamie Loichinger, Assistant Director
Advisory Council on Historic Preservation
401 F Street, Suite 308
Washington, DC 20001-2637

RE: Proposed Route 7/Route 15 Interchange Project (SPN 0102-0358)
Norwalk, Fairfield County, Connecticut
ACHP Connect Case #014039

Attention: Sarah C. Stokely, Program Analyst

Dear Mr. Loichiner:

The Federal Highway Administration (FHWA) is providing this correspondence in response to the Advisory Council on Historic Preservation's (ACHP's) correspondence of June 4, 2019. The ACHP letter provides commentary on the *Draft Phase I/II Cultural Resources Survey, Route 7/15 Interchange Project (State Project No. 102-358)*, provided to your office as part of the Section 106 consultation process. FHWA has asked the Connecticut Department of Transportation (CTDOT) and their consultants engaged in the environmental documentation for this project to review your comments and provide formal responses to the various issues you raised in the above noted letter. As part of our response, please note the following materials attached herein:

- *Summary of Section 106 Consulting Parties Meeting Comments/Responses (9-26-19) including formal response to Advisory Council on Historic Preservation (ACHP) June 4, 2019 Letter*
- *Updated Draft Phase I/II Cultural Resources Survey, Route 7/Route 15 Interchange (State Project No. 102-358) (Revised August 24, 2020)*

At this stage in the process, FHWA would like to clarify the intent of the draft report and status of ongoing work. The report provides a summary of the various alternatives under consideration and establishes the Area of Potential Effect (APE) for the project. In a number of instances in your review, ACHP is requesting additional analysis or additional characterization of potential adverse impacts for the alternatives under consideration. The Phase I/II Cultural Resources report is intended to provide the Section 106 consulting parties with a summary of benchmark features in the corridor. The CTDOT is currently proceeding with the more technical analysis

and studies (traffic, noise etc.) that will help in providing the detail necessary to characterize the nature and intensity of potential adverse effects.

We expect the draft environmental document to be completed in the coming months and we will keep you apprised of progress as we move forward. If you have any questions, please do not hesitate to contact me.

Sincerely,

M EMILIE
HOLLAND

 Digitally signed by M EMILIE
HOLLAND
Date: 2020.10.28 07:04:00 -04'00'

Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

Summary of Section 106 Consultation Comments/Responses

Advisory Council on Historic Preservation (Formal Letter): Comments on Phase I and II Cultural Resources Survey

“The ACHP is concerned that not enough detail is provided to properly characterize the nature and intensity of the adverse effects . . .” (ACHP letter, p. 1).

The general statements in the draft report have been supplemented in the revised report by a detailed inventory of five separate segments of the Parkway within the project area:

- West end, vicinity of Perry Avenue bridge
- Parkway overpass of Route 7
- Parkway between Route 7 and Main Avenue
- Main Avenue ramps
- Parkway east of Main Avenue

For each segment, the following defining historic characteristics were assessed: roadway width, median and verges, alignment, plantings, bridges, signage, guiderails, and views. The added material in the revised report includes several pages of new text (pp. 30-35), one new figure (Figure 27), and 25 new photographs (Photographs 7-31).

“[The report] does not clearly indicate which landscape related contributing elements in the Merritt Parkway Historic District retain integrity in the context of the significant changes to the landscape over time. The ACHP recommends that FHWA include in the Effects Report a more detailed analysis of how the landscape characteristics could potentially be affected by each alternative.” (ACHP letter, p.2).

The revised report identifies potential integrity issues for each of the defining characteristics (roadway width, median and verges, alignment, plantings, bridges, signage, guiderails, and views) on pages 30-32. The inventory of the five segments (pp. 31-33) assesses how intact each of the defining characteristics is. However, the effects analysis must remain at a more general level until a higher specificity of design is developed for each alternative. At the May 7, 2019 meeting, AHS made this point, and representatives of the Connecticut Trust for Historic Preservation appeared to agree that at this point in time, the specific impacts of an alternative on a particular characteristic are not known, but that a more detailed inventory would allow such an assessment as design progresses.

“Several historic properties are located outside the APE/VIAA. . . The ACHP requests that FHWA explain why these properties are included in this assessment of effects if they are outside the APE/VIAA.” (ACHP letter, p.2).

As a result of public outreach, it was determined that residents of the Silvermine Center and Silvermine Avenue historic districts were very concerned about how the project would impact their neighborhoods. It was thought to be important that the report affirmatively state that the districts were outside the APE/VIAA and would not be directly or visually affected, rather than having it appear that the public concerns were not given consideration (p. 50).

“If there are concerns regarding the potential for indirect or cumulative effects to these properties resulting from visual impacts or changes with traffic patterns, FHWA should determine whether the APE/VIAA should be expanded appropriately.” (ACHP letter, p.2).

The draft report stated that these properties would not experience visual effects. Traffic-pattern effects were not known at the time of the report. The draft report did note that noise-effect data and vibration-effect data were not available at the time and stated that should the data show effects on these properties, the APE would have to be expanded (p. 4). The revised draft (August 6, 2019) added traffic impacts as a possible reason for expanding the APE (p. 4). At the time of the final report, effects on air quality, traffic, vibration, and noise had been assessed, resulting in the finding of no adverse indirect effects (p. 5).

“The ACHP requests that FHWA clarify if the Silvermine Avenue Historic District is considered eligible for the NRHP.” (ACHP letter, p. 2).

The Silvermine Avenue Historic District was formally approved for NRHP study by the CTSHPO in 2009, but as of this date has not been acted upon by the State Historic Preservation Board. Its status will be “proposed” until SHPO schedules it for a State Historic Properties Board meeting, at which time it could be considered “pending.” The revised report makes clear that this district is outside the APE (p.50).

“The ACHP requests FHWA include an analysis of cumulative effects, based on traffic studies . . . Additionally, the ACHP requests FHWA notify the consulting parties when it will report on the potential for impacts from noise and vibration. . . .” (ACHP letter, p.2).

Additional technical studies for various environmental considerations have been completed. Traffic, noise, and vibration are included in those considerations (p. 5). The analyses will be included in the environmental document being developed and CTDOT will coordinate with FHWA and subsequently the ACHP to provide additional updates as needed.

“The ACHP requests that FHWA provide additional photographs and information related to the Merritt Parkway Historic District’s integrity to help clarify these potentially contradictory statements [regarding the character of the east end of the Parkway]” (ACHP letter, p.2).

The east end of the project area has a higher degree of integrity of design, feeling, and association due to the characteristics of this portion (narrow width, median, plantings) but much less integrity of setting due to the proliferation of modern commercial, office, and residential construction. This distinction is made explicit in the revised draft (pp. 29, 33), so the statements no longer appear contradictory.

The addition of several pages of new text and 25 new photographs inventorying the Parkway’s characteristics at a greater level of detail (pp. 30-35, Figure 27, and Photographs 7-31) also help to clarify the character of the east end of the project area.

“The ACHP supports the request made by the National Trust for Historic Preservation during the recent consultation meeting [May 7, 2019] that FHWA and CTDOT compare the four build alternatives currently under consideration with the previous alternatives proposed in 2008.” (ACHP letter, p. 3.)

In response to the National Trust for Historic Preservation’s request for additional information on the Project Purpose and Need and current alternatives compared to the original design made at the May 7, 2019 consultation meeting, a response and package of information including the following materials was submitted:

- May 7, 2019 Section 106 Consulting Parties Meeting presentation;
- Link to Project Purpose and Need on project website;
- Original Design and Alternative 12A Cross sections
- Original Design and four (4) current alternatives concept plans; and
- Link to the 3D visualization model

These were provided to the ACHP via email on January 8, 2020 . Please note that subsequent to the May 7, 2019 meeting, the Project Team working with the Project Advisory Committee further narrowed the alternatives to be assessed in the environmental document to Alternatives 21D and 26.

National Trust for Historic Preservation

The National Trust requested the following information (May 7, 2019 meeting):

- Copy of the May 7, 2019 Section 106 presentation
- Purpose and Need statement
- Virtual tour
- Links to original design and current alternatives

The materials were assembled by the Consultant and submitted to CTDOT/forwarded to OEP for formal response. The National Trust received the same information as ACHP via email on January 8, 2020.

Connecticut Trust for Historic Preservation

Is there a cultural landscape analysis and report?

Should the existing NPS documentation be updated and expanded? (May 7, 2019 meeting).

The more detailed inventory undertaken for the revised report should serve as an adequate basis to assess effects as design specificity moves along.

Methodology of determining APE/ VIAA should have more detail. (May 7, 2019 meeting).

The revised report cites the 2015 FHWA guidelines and summarizes what was done: desktop review, site visits, and visual simulations (pp. 4-5). Figure 3 was added to illustrate visually constraining factors such as landforms, buildings, and vegetation. The Visual Impact Assessment Report is included in the report's Appendix F.

**PUBLIC REPORT
PHASE I AND II CULTURAL RESOURCE SURVEYS
ROUTE 7/ROUTE 15 INTERCHANGE PROJECT
STATE PROJECT NO. 102-358
NORWALK, CONNECTICUT**

Prepared for

Stantec
55 Church Street, Suite 601
New Haven, CT 06510

by

Archaeological and Historical Services, Inc.
569 Middle Turnpike
P.O. Box 543
Storrs, CT 06268

Authors:
Marguerite Carnell
Bruce Clouette
Mary Guillette Harper
David E. Leslie
Stacey Vairo

December 13, 2018
Updated August 24, 2020

CTDOT Evaluation Letter to Consulting Parties
September 21, 2020

From: McMillan, Mark J.
Sent: Monday, September 21, 2020 4:32 PM
To: McMillan, Mark J.
Subject: PLEASE REVIEW: §106 Evaluation of Route 7/15 Interchange Project (State Project #102-358), Norwalk
Attachments: §106-RECOMMENDATION-LETTER_Norwalk_102-358_20200921.pdf; §106-APPENDIX-B_Norwalk_102-358_20200921.pdf

Good morning,

Attached is an evaluation letter of the alternatives under for State Project #102-358, which proposes to reconstruct the Route 7 / Route 15 interchange in Norwalk. The letter considers the impacts that each alternative will have to historic properties and provides recommendations of effect in accordance with the National Historic Preservation Act.

As a Consulting Party to the Section 106 review process, please review this evaluation. If you or your organization has comments or input regarding the evaluation or its recommendations of effect, please provide them within the next 30 days. The comment period will conclude on Friday, October 23, 2020. The information you and the other Consulting Parties provide will help ensure that the impacts to historic properties are fully considered and will inform the process of identifying a preferred alternative of action.

Due to its large size, Appendix A – the Phase I and II Cultural Resources Report can be accessed using this link:

FTP link: <https://tmppsftp.stantec.com>

Login name: s1001080133

Password: 3386884

Disk Quota: 2GB

NEW Expiry Date: 10/15/2020

Appendix B is attached in this email.




For additional information regarding the Route 7 / Route 15 Interchange Project, you can visit the project website: www.7-15norwalk.com.

If you have any questions or require further information regarding this document, contact Mark McMillan at mark.mcmillan@ct.gov.

Mark

I am currently teleworking out of the office but am available via email.
If this is an urgent matter, please email me your telephone number and I will contact you.
Stay well!

Mark McMillan
Supervising Transportation Planner

Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
 (860) 594-2135
 (860) 594-3028 - *Fax*
 mark.mcmillan@ct.gov



STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546



Transmittal:

From: Lucas A. Karmazinas
Date: September 21, 2020
Through: Robert Bell, Director, CTDOT Bureau of Policy & Planning
To: Jonathan Kinney, Deputy State Historic Preservation Officer

Project: State No.: 102-358
F.A.P. No.: 0015(133)
Project Title: Route 7/Route 15 Interchange Project
Town: Norwalk

Subject: SHPO Consultation Documentation

Description of Activity

The Connecticut Department of Transportation (CTDOT) is currently evaluating a project that will address the functional deficiencies of the Route 15 (Merritt Parkway) interchanges with Route 7 and Main Avenue in Norwalk. The Merritt Parkway was developed as Connecticut's first divided-lane, limited access highway between 1934 and 1942 and it extends 37.5 miles from the New York border in the west to Stratford in the east. The Merritt Parkway was listed in the National Register of Historic Places as a historic district in 1991 and is significant at the national level under Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (embodying the distinctive characteristics of a type, period or method of construction, or possessing high artistic values).¹

The Merritt Parkway's interchange with Main Avenue (Interchange No. 40) was included as part of the parkway's original design, however, the interchange with Route 7 (Interchange No. 39) was not constructed until 1990. This being said, Interchange No. 39 provides only partial connections between the two highways and, as a result, linkages to and from the north are not provided. On the other hand, connections in all directions are presently available at Interchange No. 40, which is located approximately 1500' east of Interchange No. 39 (Image 1). The proposed State Project #102-358 seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40.

¹ National Park Service, *Merritt Parkway* (NPS #91000410), listed April 17, 1991.

Because the proposed project anticipates the use of both federal and state funding, it falls under the purview of the National Historic Preservation Act (NHPA). “Section 106” is the clause of the NHPA that mandates federal agencies to consider the effects of an undertaking on historic properties. The process is codified in 36 CFR 800.1-16, and is often referred to colloquially as “Section 106”.

Concurrent with the Section 106 evaluation, an Environmental Assessment / Environmental Impact Evaluation (EA/EIE) document is being prepared for State Project #102-358 in an effort to analyze the broader environmental impacts of proposed project alternatives in accordance with the National Environmental Policy Act (NEPA) and the Connecticut Environmental Policy Act (CEPA).

The EA/EIE will evaluate the impacts of the project on the man-made, social, and natural environments and will recommend the preferred alternative of action. It is currently considering three alternatives that consist of a “No Build/No Action” option and two “build” alternatives that will entail construction actions. This document will evaluate the build alternatives impacts specifically as they impact historic properties (above- and below-ground) in accordance with the provisions of Section 106 of the National Historic Preservation Act. The information provided by this review process will complement other analyses that are being conducted under NEPA/CEPA.

Each of the alternatives have been developed in association with a public stakeholder group and were presented at a public meeting conducted in 2017. CTDOT invited representatives from the Merritt Parkway Conservancy, a Project Advisory Committee, and the public to participate in the PAC meetings, and to provide input on both historic/cultural considerations as well as the environmental impacts as a whole.

Technical Review of Project

The Merritt Parkway is a divided-lane, limited access highway with two primary travel lanes in each direction (northbound and southbound). It was constructed by the State of Connecticut between 1934 and 1942 and travels on a roughly southwest to northeast course over its 37.5-mile traverse between the New York State border and Stratford, respectively. Conceived as both a high-speed transportation corridor and naturalistic landscape, the Merritt maintains a 300'-wide right-of-way (ROW) throughout its length, this providing for carefully designed sweeping curves, long-framed vistas, and a wide median and shoulders initially planted with tens-of-thousands of native trees, shrubs, and other flora.

The Merritt Parkway is also notable for its prominent over- and underpasses, of which 36 of each were originally constructed. The bridges were designed by George L. Dunkelberger, Senior Draftsman and, after 1941, the Connecticut Highway Department's Highway Architect. They feature a mix of Art Deco, Moderne, and historical revival styles, and employed cast, colored, and sgraffitto concrete and detailed ironwork. Architecturally significant works of art in their own right, the Merritt's bridges both accentuate the visual character of the parkway and blend into its naturalistic landscape.

The aforementioned developmental background and design details resulted in a historically and architecturally significant resource that justified the Merritt Parkway's inclusion on the National Register of Historic Places under Criteria A and C in 1991. Its areas of significance include Transportation (as a largely intact example of a 20th-century parkway), Architecture (for its historic bridges and rest areas), and Landscape Architecture (as a significant work of naturalistic landscape architecture). This being said, a Public Report summarizing Phase I and II Cultural Resources Surveys prepared as part of State Project #102-358 (Public Report) notes that the parkway has undergone a litany of changes since its opening in 1942.² These include "added lanes, inconsistent signage and guiderail treatments, reduction of the median, development proximity to the right-of-way, and inappropriate, lost, or overgrown plantings."³ The alterations, the report notes, however, have not compromised the overall historic character and integrity of the Merritt Parkway or, more specifically, the portion of the parkway to be potentially impacted by State Project #102-358.

As noted, the proposed undertaking seeks to address the deficiencies of the Route 7 and 15 interchange through improvements at both Interchanges No. 39 and No. 40. At present, Interchange No. 39 provides connections only from:

- Route 7 northbound to the Merritt Parkway southbound.
- Route 7 southbound to the Merritt Parkway southbound.
- Merritt Parkway northbound to Route 7 northbound.
- Merritt Parkway northbound to Route 7 southbound.

As a result:

- Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road.
- Merritt Parkway northbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue.
- Route 7 motorists have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

On the other hand, full connections are provided between the Merritt Parkway and Main Avenue at Interchange No. 40, which would allow for use of, or integration with, aspects of this feature in implementing full connectivity between the Merritt Parkway and Route 7. A full outline of the proposed alternatives and their potential impacts on historic resources is described below in "Alternatives Under Consideration."

² Archaeological and Historical Services, Inc., *Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut*, prepared for Stantec, December 13, 2018, Updated May 15, 2020 (See Appendix A).

³ Archaeological and Historical Services, Inc., p. i.

The need to improve Interchange No. 39 became apparent not long after its initial completion. A new alternative that provided connections in all directions between the Merritt Parkway and Route 7 was designed and approved in the late 1990s, with initial construction taking place in 2005. This work was halted in 2006, however, after the Federal Highway Administration (FHWA) was successfully sued under Section 4f of the U.S. Department of Transportation Act of 1966 due to the implications of the project. Public consensus on a new design alternative was reached in 2009, yet a lack of funding prevented the project from moving forward at that time. Public coordination and further modifications to the design under the present project were initiated after federal and state funds were secured in 2016.

Project Site and Area of Potential Effects (APE)

The APE is the geographical space in which an undertaking may create changes to a historic property's character or use. According to Section 106 regulation 800.5, "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association."⁴ As State Project #102-358 is currently in its preliminary design phase, the Project Site for the purposes of this review and the Phase I and II Cultural Resources Surveys consists of the greatest possible footprint of construction activities (direct effects) for all four design alternatives presently under consideration (Image 2), while the Area of Potential Effects (APE) consists of the greatest possible extent of direct and indirect effects, the latter including visual, noise, vibration, air quality, and traffic effects resultant of the proposed work (Image 3). It was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys, however, that indirect effects on air quality, noise, traffic, and vibration resultant of all of the design alternatives would be negligible.⁵ Each of the alternatives would provide improvements in the existing conditions such as air quality and traffic congestion when compared to the "no build" alternative of not taking action.

The Public Report outlines the methodology used to define the project's APE and to identify historic resources that might be potentially impacted by the project. Subsequent evaluation of project's construction (direct) and visual (indirect) effects revealed the presence of six additional Historic Properties within the APE that may be affected by the proposed project. These properties are:

Merritt Parkway Historic District

Connecticut's first divided-lane, limited access highway, alternately identified as Route 15. Built between 1934 and 1942, it extends 37.5 miles from the New York State border to Stratford.

⁴ Archaeological and Historical Services, Inc., p. 4.

⁵ Archaeological and Historical Services, Inc., p. 5.

It was listed in the National Register of Historic places in 1991 under Criteria A and C and retains its overall historic character and integrity despite various alterations over the almost 80 years since its completion.

The portion of the Merritt Parkway located within the APE extends 1.5 mile and includes five historic bridges that contribute to the Merritt Parkway Historic District. From west to east they consist of the:

- Perry Avenue Bridge (#00719) – Single-span, rigid-frame concrete bridge with arched opening built in 1936 to carry the Merritt Parkway over Perry Avenue (Image 4). It bears stylistic influences of the Art Moderne and Modern Classicism and features a concrete balustrade with a bas-relief cartouche of the Connecticut State Seal on the interior face of the northeast pylon. The bridge retains its historic character and physical integrity, however, the visual setting has been heavily impacted by the construction of flanking concrete and steel girder bridges erected as part of the Route 7 and 15 interchange project in 1990.
- Metro-North Railroad Bridge (#00720)(aka Winnipaug Railroad Bridge) – Single-span, rigid-frame, reinforced concrete bridge with arched opening built in 1937 to carry the Merritt Parkway over the Metro-North Railroad (Image 5). Utilitarian design with plain concrete abutments and wingwalls. Retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- Main Avenue Bridges (#00530A & #00530B) – Twin single-span, rigid-frame concrete bridges with arched openings and random rubble facing built in 1937 to carry the Merritt Parkway over Main Avenue (Image 6). Designed in a mixed Classical Revival and Rustic style with granite voussoirs, quoins, and coping. The northern parapet and northeast wingwall of Bridge #00530B (the northern span) were replaced in kind in 2015 and 2016, however, the bridges retain their historic character and physical integrity despite the rehabilitation and other changes to their visual setting resultant of commercial development to the north and south.
- Norwalk River Bridge (#00721) – Three-span, reinforced concrete arch bridge built in 1938 to carry the Merritt Parkway over the Norwalk River (Image 7). Utilitarian design with wide raised bands in each arch and the parapets. While the bridge was rehabilitated in 1988, it retains its historic character and physical integrity and is clearly visible from Glover Avenue.
- West Rocks Road Bridge (#00722) – Single-span, steel, rigid-frame bridge with segmental-arch opening built to carry West Rocks Road over the Merritt Parkway in 1937 (Image 8). Designed in a mixed Moderne and Neoclassical style with ornamental metal railings and crenellated parapet. The bridge's rehabilitation in 2018 was determined to result in No Adverse Effect and, as such, the bridge retains its historic character and physical integrity.

The Public Report notes that the portion of the Merritt Parkway located within the APE has experienced numerous changes to its structures, landscape, and setting, yet it retains its overall historic character. The report reads,

The western portion of the Parkway within the APE today mostly resembles a modern interstate highway rather than a scenic parkway. It features typical modern entrances, exits, and signage and lacks historic elements found throughout the rest of the Parkway, such as a wide landscaped median. The easternmost portion of the APE, east of the Main Avenue interchange, retains more of the Parkway's historic character, derived from the planted median strip, narrow verges, and close-to-the-road landscaping. At a closer level of detail, however, exceptions can be found within these generalizations. For example, in the more highly altered western portion of the APE, there is a typical Parkway rock cut close to the roadway, at the southbound on-ramp from Route 7 North, and there is a small group of trees in the median as the roadway ascends toward the Perry Avenue undergrade bridge that is not unlike the original Parkway treatment. The overall geometry of the eastern portion of the APE is more intact, but details such as modern signage, condition of the vegetation, and modern guiderails reduce the experience of the original Parkway concept. Long views in the eastern portion reveal the dense modern commercial, office, and residential development that surrounds this portion of the Parkway.⁶

The aforementioned conditions are more comprehensively laid out in the Public Report and are based upon evaluation of eight critical components of the parkway's original design. They include roadway width, median and verges, alignment, vegetation, bridges, signage, guiderails, and views. The relevant evaluation can be found on pages 32-34.

Verneur Pratt Historic District

The Verneur Pratt Historic District is located at 144-116 Pratt Avenue and was listed on the National Register of Historic Places in 2011 (Image 9).⁷ It is comprised of a Georgian-style residence built ca. 1788 and a ca. 1800 barn associated with scientist Verneur E. Pratt, who purchased the property during the early 20th century. The historic district is located approximately 0.25-mile north of the Pratt Avenue bridge and retains its historic character and physical integrity.

Glover Avenue Bridge (#04155)

The Glover Avenue Bridge (aka Belden Hill Avenue Bridge) is a two-span, stone-arch bridge built by the City of Norwalk to carry Glover Avenue (originally Belden Hill Avenue) over the Norwalk River in 1912 (Image 10). The bridge is constructed of rubble fieldstone and is accented with brownstone voussoirs and coping.

⁶ Archaeological and Historical Services, Inc., p. 30.

⁷ National Park Service, *Verneur Pratt Historic District (NPS #11000434)*, listed July 19, 2011.

It was determined eligible for the National Register of Historic Places by CTSHPPO following documentation as part of the statewide bridge inventory completed in 1991 and was the subject of State-Level Documentation prepared under a previous iteration of State Project #102-358 in 2000.⁸ The bridge retains its historic character and physical integrity.

Archaeological Site 103-57

Archaeological Site 103-57 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D (Information Potential) as part of Phase II testing.⁹ It consists of a Middle/Late Archaic, or possibly Woodland-Age, site located within the Project Site.

Archaeological Site 103-58/60

Archaeological Site 103-58/60 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹⁰ It consists of a combined Late Archaic/Pre-Colonial site located within the Project Site.

Archaeological Site 103-61/62

Archaeological Site 103-61/62 was identified in Phase IB testing conducted as part of cultural resources surveys for State Project #102-358, and was determined eligible for the National Register of Historic Places under Criterion D as part of Phase II testing.¹¹ It consists of a combined Pre-Colonial/Middle Archaic site located within the Project Site.

Coordination and Consulting Parties

As noted, litigation halted a previous attempt to redesign the Merritt Parkway/Route 7 interchange in 2006. Subsequently, a public stakeholder group was organized, which, along with representatives from the Merritt Parkway Conservancy, public agencies, and other interested parties, would evaluate and vet possible design alternatives. Consensus on such a design, Alternative 21C, was reached following a public meeting in 2009, yet a lack of funding prevented the project from going to construction.

⁸ Bruce Clouette and Matthew Roth, *Connecticut Historic Bridge Survey; Inventory-Phase Final Report: Project Narrative, Inventory and Recommendations*, submitted to the Connecticut Department of Transportation Office of Environmental Planning, December 1990; Bruce Clouette, *Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut*, prepared April 2000 (See Appendix B).

⁹ Archaeological and Historical Services, Inc., p. 15.

¹⁰ Archaeological and Historical Services, Inc., p. 15.

¹¹ Archaeological and Historical Services, Inc., p. 15.

Federal and state funds for continued design efforts were secured in 2016, however, at which time a series of new alternatives were designed and presented for assessment by the consulting parties (including federally-recognized tribes, the Merritt Parkway Conservancy, the Project Advisory Committee, public agencies, and the public). The preferred options were presented via a project website launched in the fall of 2017, and a public scoping meeting held on October 17, 2017. The results of the scoping process can be found in a summary report prepared by FHWA and CTDOT, although the vetting of the preferred option(s) is ongoing.¹²

Alternatives Under Consideration and Potential Impacts on Historic Properties

The purpose of State Project #102-358 is to address the existing deficiencies of the Merritt Parkway's Interchange No. 39. The goal of the project is to provide for access in all directions between the Merritt Parkway and Route 7 and, as a result, improve operations and reduce congestion on Main Avenue, which currently supplements the lack of connectivity at Interchange No. 39. Two alternatives are currently being evaluated as part of the development of the EA/EIE document. Each of the alternatives will be briefly described here and evaluated with regard to their impacts specifically to historic properties. Adverse effects are the result of an undertaking altering the qualities that make a property "historic". An adverse effect will diminish one of more of the aspects of an historic property's integrity, thereby weakening the property's ability to demonstrate a connection to the past.

More detailed descriptions of the alternatives can be found in the Public Report. It should be noted that four design alternatives are described here. The Public Report was developed to provide information regarding the historic and cultural resources within the project APE. When the Public Report was initiated, four alternatives were under consideration. During the NEPA/CEPA analysis process and in conjunction with input from the Project Advisory Committee, two of the alternatives (12A and 20B) have since been removed from consideration. A brief description of them is included in this letter so that it is consistent with the Public Report.

Alternative 12A

Alternative 12A would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 11). The reconfiguration would involve elimination of the existing loop ramps at Interchange No. 40, construction of four new modified diamond interchange ramps, construction of roughly 20 new or replacement bridges, and construction of new Merritt Parkway and Route 7 on- and off-ramps. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

¹² Federal Highway Administration and Connecticut Department of Transportation, *Scoping Report: Route 7/15 Interchange Project, Norwalk, Connecticut*, prepared January 2019.

Impacts on Historic Properties resultant of Alternative 12A include demolition of both Main Avenue Bridges (#00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It would also introduce elevated ramps that, along with other changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting, could result in a loss of integrity in terms of material, design, feeling, and association. The construction of ramps that were elevated above the Merritt Parkway was found to be a critical flaw in this alternative and consequently, Alternative 12A was removed from further evaluation.

Alternative 20B

Alternative 20B would provide for the four lacking connections at Interchange No. 39 by eliminating the two direct ramps in the western quadrants of Interchange No. 39 and establishing new semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 and construction of a system of signal-controlled intersections and ramps (Image 12). The reconfiguration would involve replacement of three of the Interchange No. 39 ramps, all the existing Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 20B include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association, although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. Archaeological Sites 103-57 and 103-58/60 would not be affected by Alternative 20B.

Each alternative was evaluated on its capacity to meet the purpose and need as well as the desirable outcomes of the project. Since the Public Report study commenced, it was determined that Alternative 20B did not sufficiently meet the desirable outcomes of the project. It was removed from further consideration.

Alternative 21D

Alternative 21D would provide for the four lacking connections at Interchange No. 39 by establishing semi-direct connections enabled by the reconfiguration of both Interchanges No. 39 and No. 40 (Image 13). The reconfiguration would involve elimination of three of the Interchange No. 39 ramps and all of the Interchange No. 40 ramps, construction of new modified diamond interchange ramps, and construction of roughly 12 new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 21D would include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B) and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association although, unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. None of the National Register-eligible archaeological sites located in the Project Site will be affected by Alternative 21D.

Alternative 26

Alternative 26 would provide for the four lacking connections at Interchange No. 39 by introducing signalized intersections on Route 7 and establishing semi-direct connections with Interchange No. 40 through the reconfiguration of both Interchanges No. 39 and No. 40 (Image 14). The reconfiguration would involve elimination of all of the existing ramps at both interchanges, construction of new modified diamond interchange ramps in all but the heavily-traveled Route 7 northbound to Merritt Parkway westbound movement, which will require a loop ramp, and construction of roughly six new or replacement bridges. In addition, Main and Glover Avenues would be widened and Creeping Hemlock Drive would be shifted northwards and widened.

Impacts on Historic Properties resultant of Alternative 26 include demolition of both Main Avenue Bridges (Bridges #00530A & #00530B), and the Glover Avenue Bridge (#04155), and visual screening of the Metro-North Bridge (#00720) and Norwalk River Bridge (#00721). It also introduces changes to the Merritt Parkway's designed landscape (such as reconstruction of the original Main Avenue interchange) and setting that could result in a loss of integrity in terms of material, design, feeling, and association. Unlike Alternative 12A, all of the new ramps will be at or below the level of the Merritt Parkway. The ramps required by Alternative 26, however, would be shorter than those employed by the other alternatives, thus resulting in a lesser overall effect on the designed landscape. Alternative 26 will directly impact Archaeological Sites 103-57 and 103-58/60, yet would not result in effects to Site 103-61/62.

Recommendation

State Project #102-358 is the subject of both an Environmental Assessment under NEPA and a Section 106 review under the National Historic Preservation Act. At this time, a preferred alternative has not yet been identified from among the four under consideration. Construction of any of the design alternatives will create indirect impacts on the area in regard to air quality, noise, traffic, and vibration, however, it was determined as part of evaluations conducted in the Phase I and II Cultural Resources Surveys that these effects would be negligible. In accordance with Section 106 of the National Historic Preservation Act, CTDOT offers the following recommendations of effect on historic properties caused by each of the alternatives relative to direct or visual (indirect) effects:

Alternative 21D

Alternative 21D will change the historic integrity of the Merritt Parkway and the Glover Avenue Bridge, yet will not affect any of the NR-eligible archaeological sites located within the project area. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 21D will be at or below the level of the Merritt Parkway. Regardless, this design will still constitute an *adverse effect to historic properties*.

Alternative 26

Alternative 26 will change the historic integrity of the Merritt Parkway, the Glover Avenue Bridge, and Archaeological Sites 103-57 and 103-58/60. Unlike Alternative 12A, however, the new ramps introduced as part of Alternative 26 will be at or below the level of the Merritt Parkway and all of the new ramps will be shorter than those required by the other alternatives. Regardless, this design will still constitute an *adverse effect to historic properties*.



Lucas A. Karmazinas
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation

Attached Documents:

☒ **Historic Review Map**

☒ **Supporting Documents**

- Appendix A – Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15 Interchange Project, State Project No. 102-358, Norwalk, Connecticut.
- Appendix B - Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

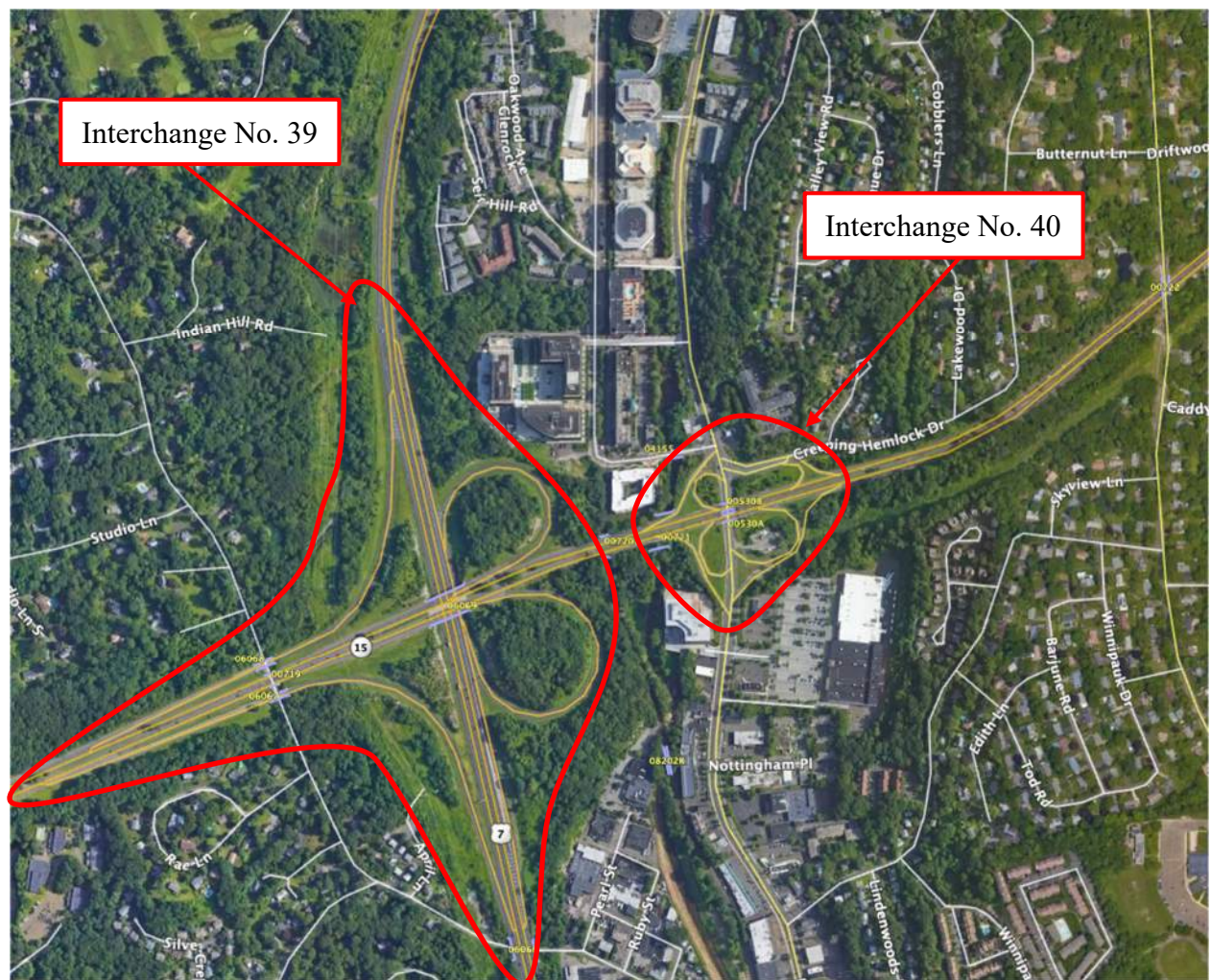


Image 1: Google Earth aerial image (2020) showing the Route 15 (Merritt Parkway) interchanges with Route 7 (Interchange No. 39) and Main Avenue (Interchange No. 40) in Norwalk.

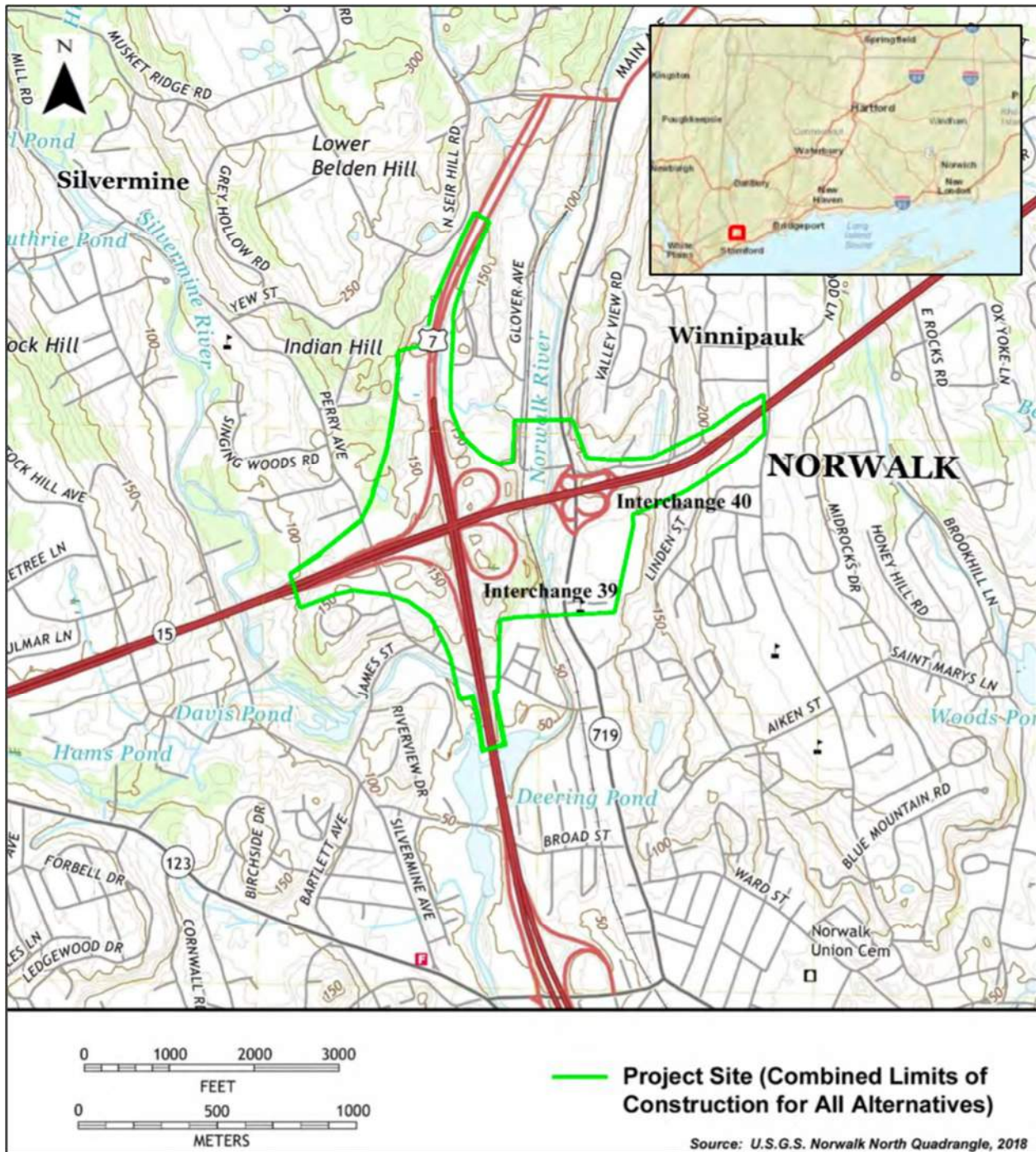


Image 2: Image showing the Project Site, which has been identified as the maximum combined limits of construction activities (direct effects) for all design alternatives.

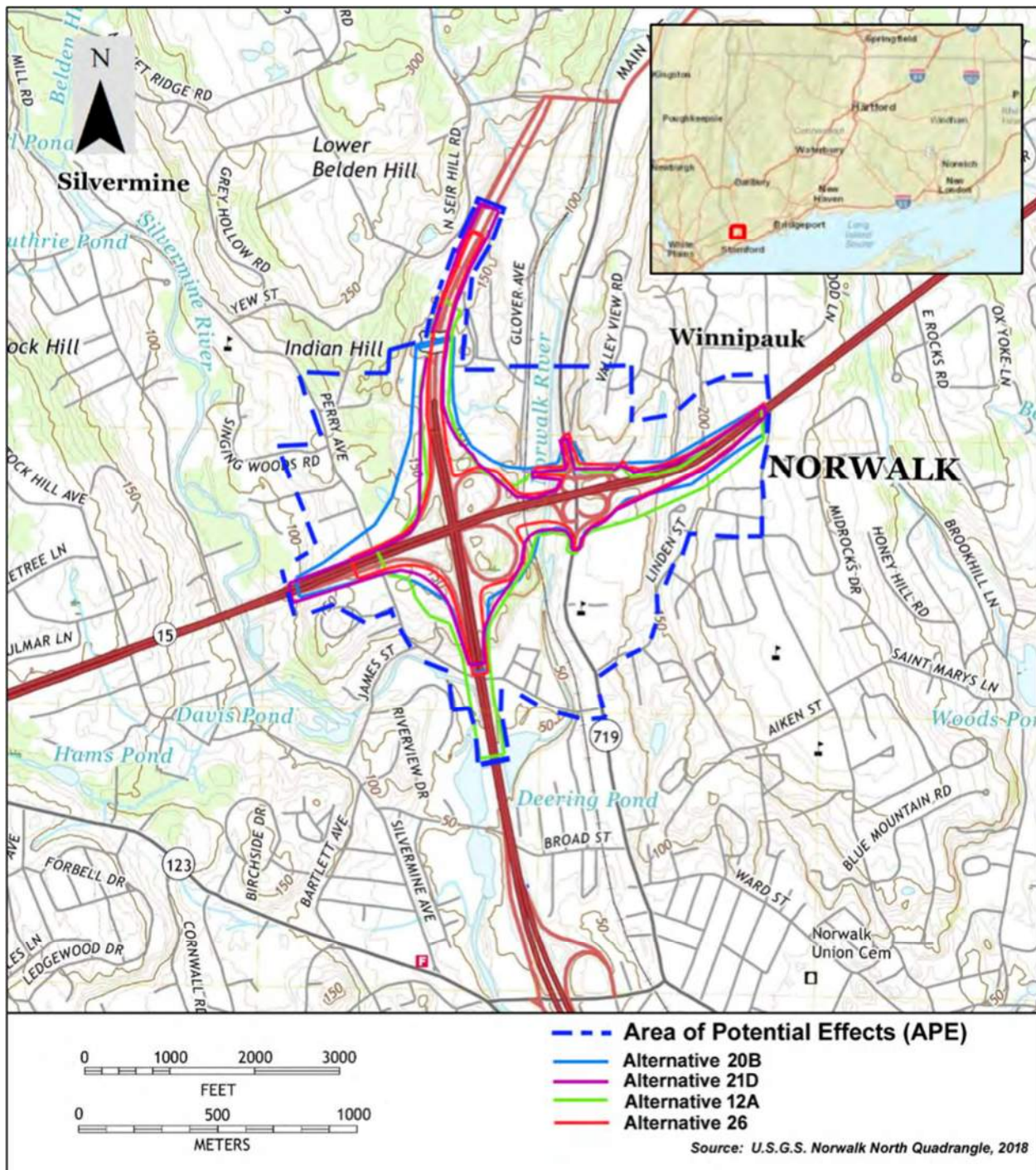


Image 3: Image showing the Area of Potential Effects (APE), which has been identified as the maximum combined limits of direct and indirect effects for all design alternatives.



Image 4: Photograph of the Merritt Parkway Perry Avenue Bridge (#00719) from Perry Avenue. Facing south.



Image 5: Photograph of the Merritt Parkway Metro-North Railroad Bridge (#00720) from the Metro-North Railroad. Facing north.



Image 6: Photograph of the Merritt Parkway Main Avenue Bridges (#00530A & #00530B) from Main Avenue. Facing north.



Image 7: Photograph of the Merritt Parkway Norwalk River Bridge (#00721) from the Norwalk River. Facing north.



Image 8: Photograph of the Merritt Parkway West Rocks Road Bridge (#00722) from the Merritt Parkway. Facing west.



Image 9: Photograph of the Verneur Pratt Historic District (114-116 Perry Avenue) from Perry Avenue. Facing northeast.



Image 10: Photograph of the Glover Avenue Bridge (aka Belden Hill Avenue Bridge, Bridge #04155) from the Norwalk River. Facing south.

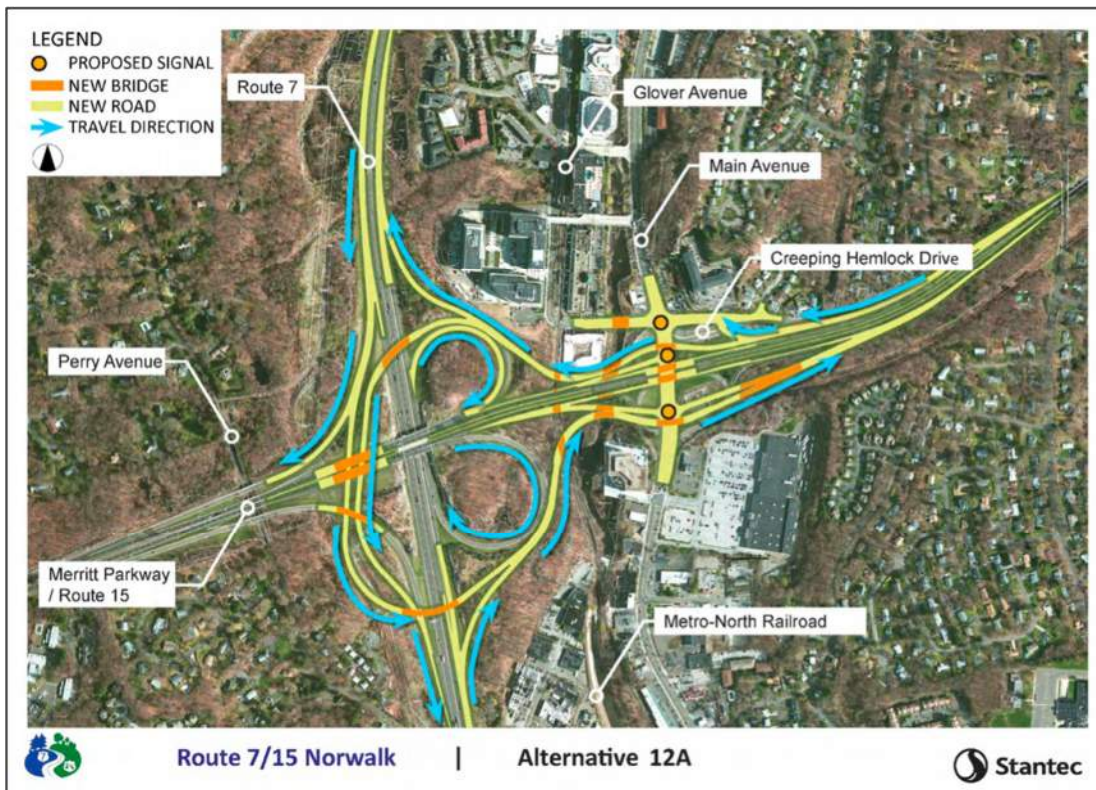


Image 11: Proposed Alternative 12A.

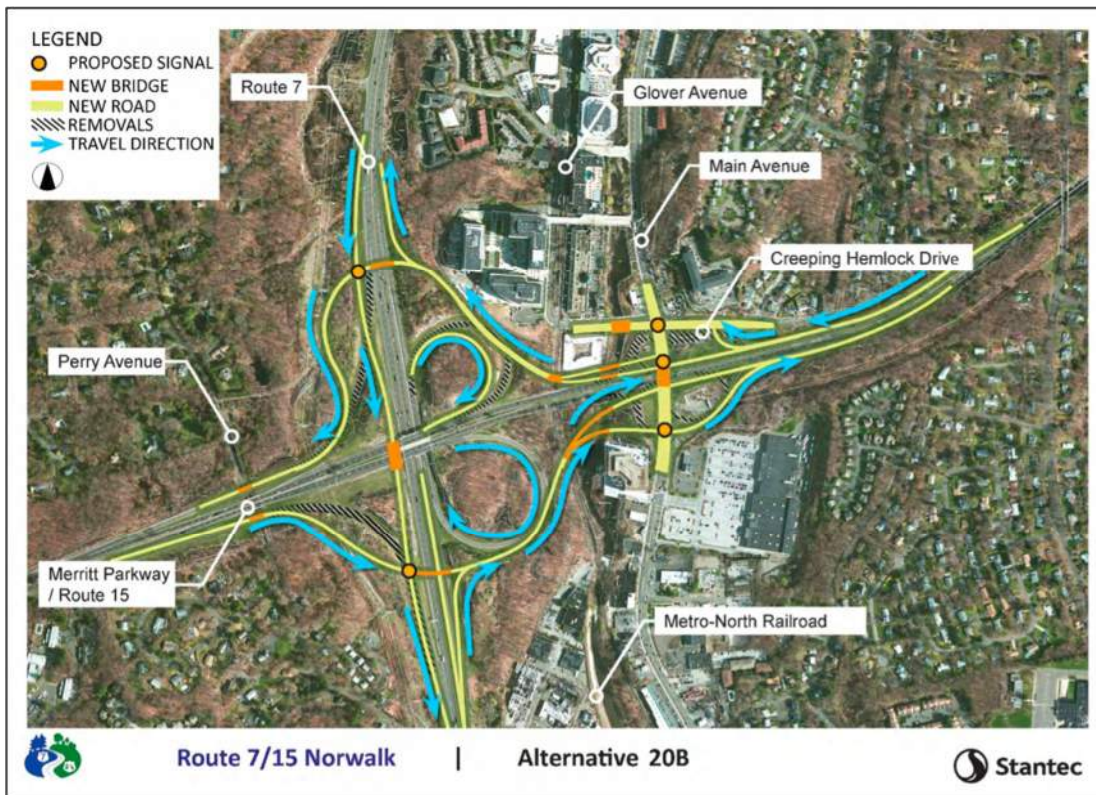


Image 12: Proposed Alternative 20B.

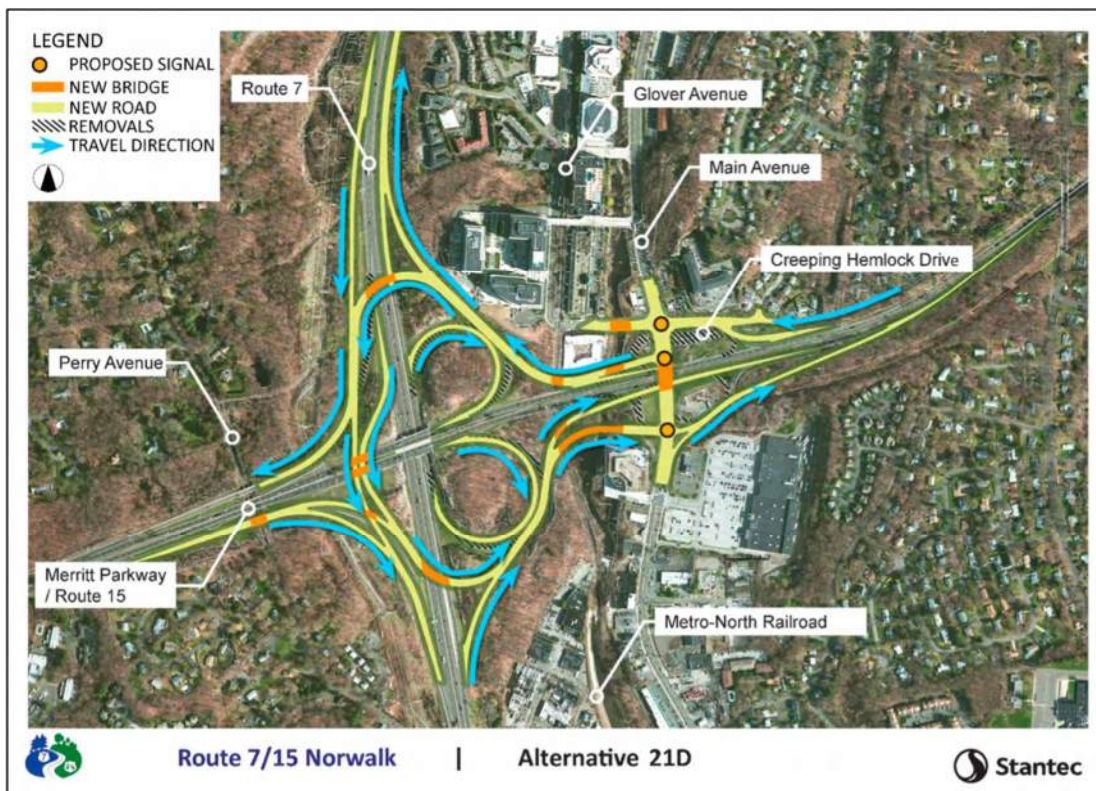


Image 13: Proposed Alternative 21D.

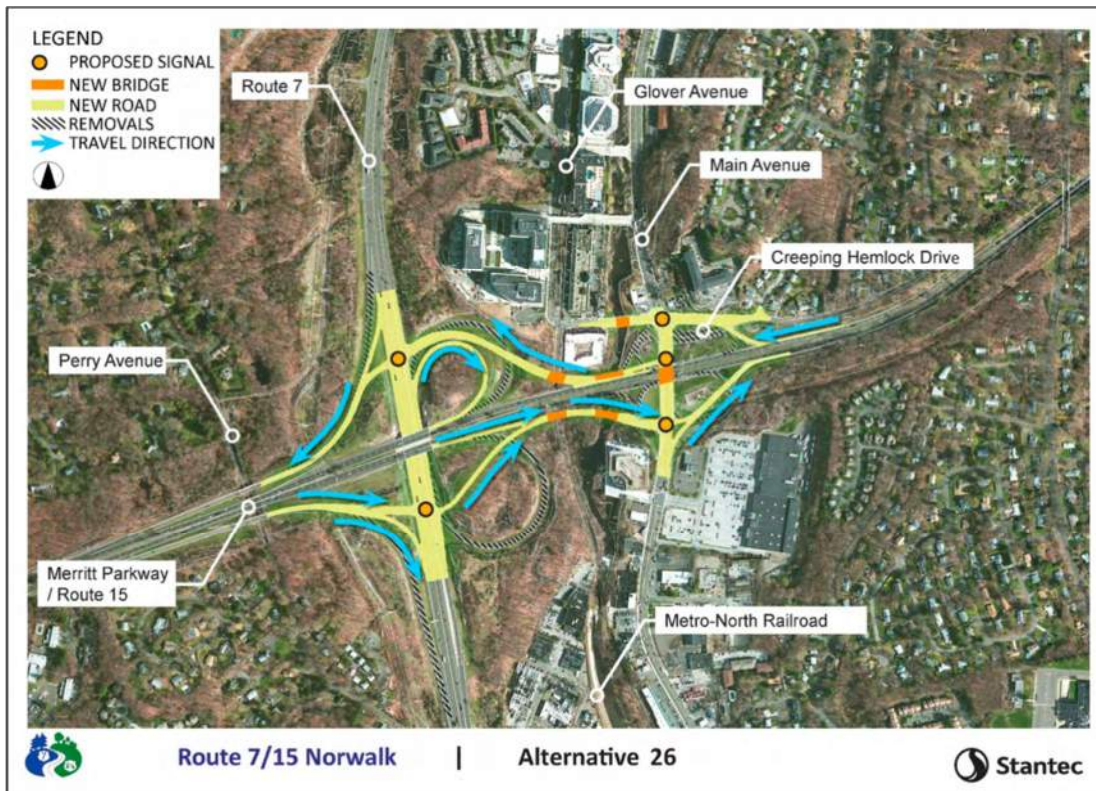
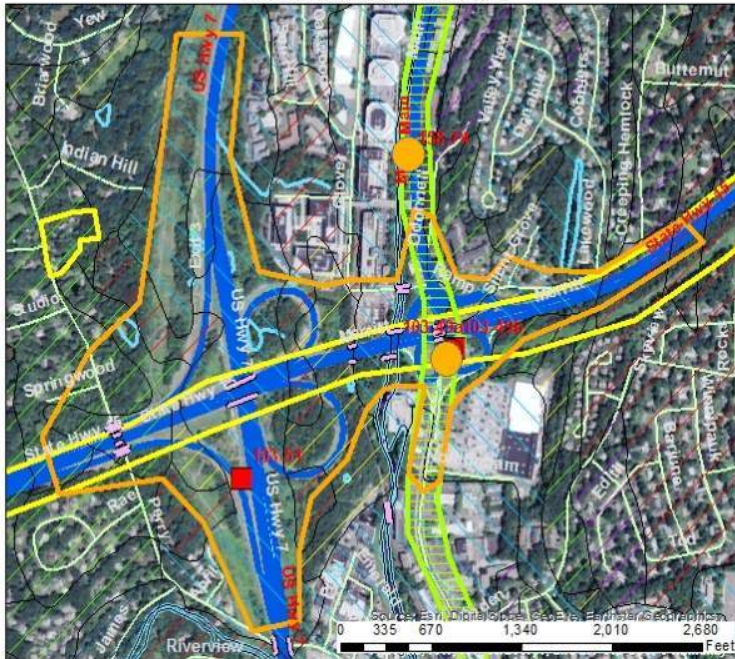
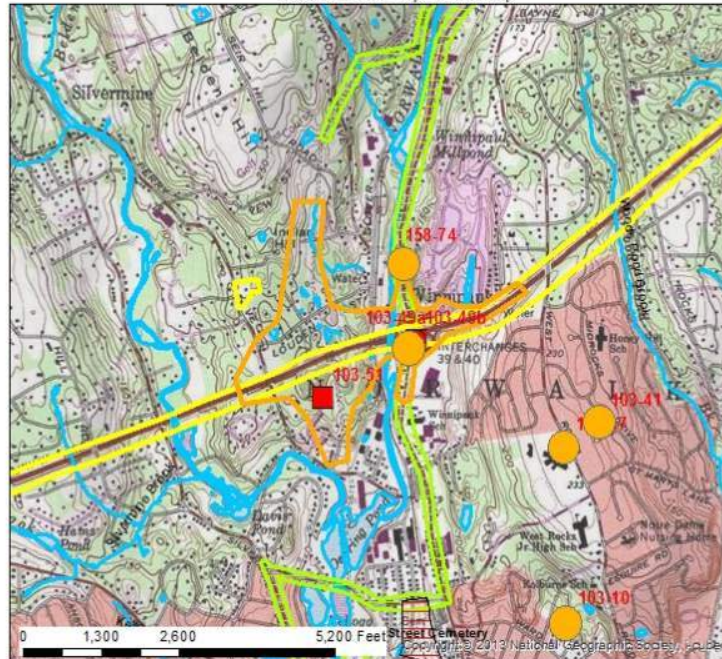


Image 14: Proposed Alternative 26.

Detail of Recent Aerial Photography



Detail of USGS Topo Quad Map



Office of Environmental Planning Environmental Review - Historical and Archaeological Resources

State Project No. 102-358
Reconstruction of
Route 7 / Route 15
Interchange
Norwalk

- Project Area
- Natl Hist Landmarks
- NRHP-Listed Structures
- Historic Districts
- Cemetery
- Previous Arch Surveys

Detail of 1811 Warren Map w/ overlay of Griswold Map of Reconstructed Native Settlement circa 1625



Detail of 1856 Chace Map of Fairfield County



Approximate Location
of Archaeological Site

- Historic
- Pre-Contact
- Unknown

Predicted Archaeological
Soil Sensitivity

- | | |
|----------|----------|
| High | Variable |
| Moderate | Poor |
| Low | Unknown |



February 4, 2016

Appendix A

Public Report: Phase I and II Cultural Resources Surveys; Route 7/Route 15
Interchange Project, State Project No. 102-358, Norwalk, Connecticut.

Appendix B

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155), Glover Avenue, Norwalk, Connecticut.

Location: Glover Avenue over the Norwalk River, Norwalk

Structure type (as built): Stone arch

Year built: 1912

National Register eligibility recommendation from 1991: Eligible

Changes since the 1991 inventory:

- No apparent changes.
- The index to the Connecticut Historic Preservation Collection at the University of Connecticut archives lists a 2000 state-level documentation for the bridge.

Recommendation: The bridge retains its historic character and should continue to be considered National Register-eligible.

Bridge as photographed for the 1991 inventory.





South elevation, camera facing northeast.



North elevation and west end, camera facing southeast.



Detail of masonry, north elevation, camera facing southeast.



West end, camera facing east.



East end, camera facing west.



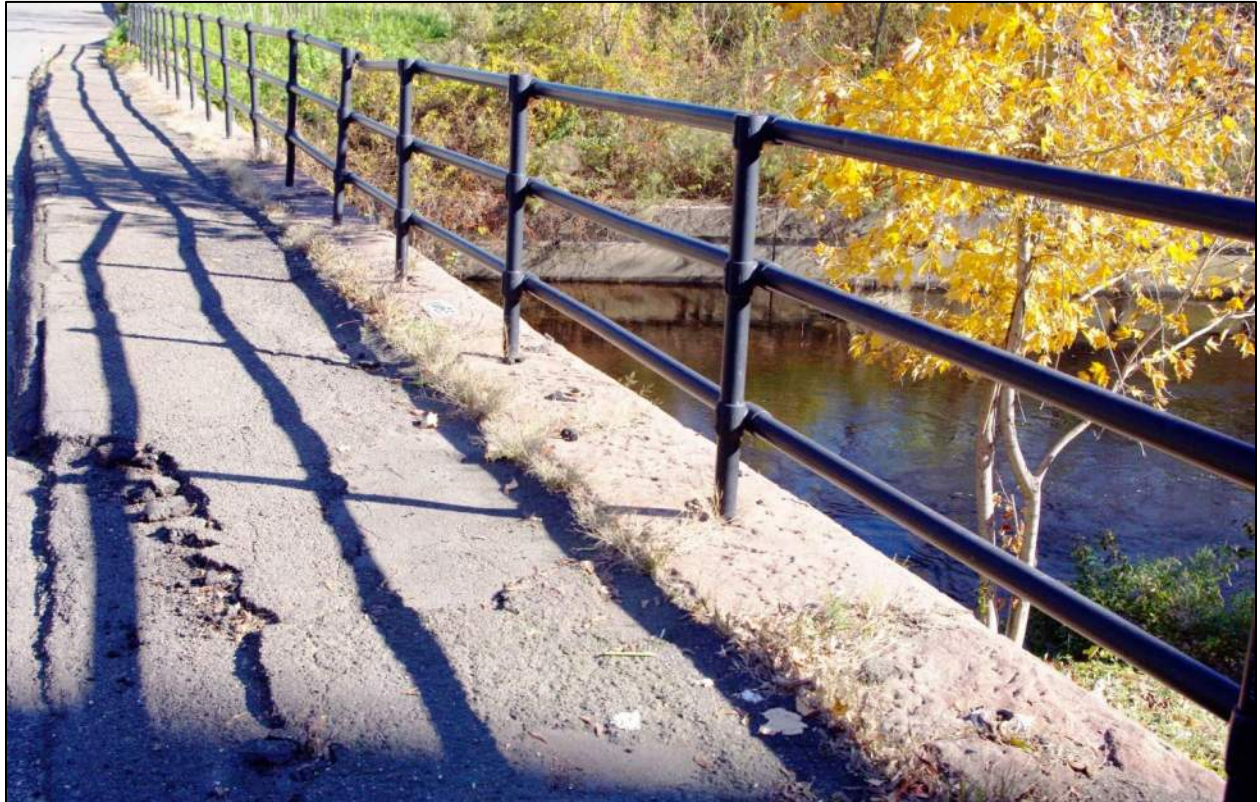
Detail of masonry, underside of bridge, camera facing east.



Detail of masonry, south elevation, camera facing northeast.



Detail of masonry, south elevation, camera facing north.



Detail of railing and capstones, camera facing east.



Detail of inscribed south elevation capstone, camera facing south.

Update form prepared by:

Marguerite Carnell, Architectural Historian
Archaeological and Historical Services, Inc.
569 Middle Turnpike/P.O. Box 543
Storrs, CT 06268

11/08/2018



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Identification

Bridge # 4155 name(s) _____

Location

street Glover Avenue feature crossed Norwalk River
city, town(s) Norwalk [] vicinity of _____
state Connecticut code CT county Fairfield code 001

Ownership

[] private _____
[x] public - local [] public - state

Use

[x] highway [] pedestrian only [] closed [] by-passed [] other _____

Description

Form arch-deck Design _____
Principal material masonry
Abutment material masonry

Date of construction 1912

Dimensions

Number of spans 2 Overall length 90' Maximum span length 40'
Roadway width 23' Vertical clearance unlimited
Height over feature spanned c.9' Skew _____
Depth of construction c.13'
Setting commercial

Present and historical appearance:

This 2-span masonry-arch bridge features the unusual and distinctive use of polychrome stonework as a means of enhancing its appearance. The elliptical arches are each outlined by cut ring stones of brownstone, while the spandrels are a random ashlar of granite blocks. The original curbs are rusticated brownstone blocks, to which a modern pipe rail has been added.

Statement of SignificanceLevel of significance: ☐ national ☐ state ☒ localNational Register Criteria: ☒ A ☐ B ☒ C ☐ DExceptions: ☐ moved ☐ less than 50 years old ☐ other _____**Areas of significance****Period of significance****Significant dates**

Engineering _____

1912

1912

Transportation _____

Significant person(s): _____

Designer _____

Fabricator _____

Contractor _____

This bridge is significant as an unusually handsome example of the early 20th-century stone-arch bridge. The polychrome masonry and the thin spandrels above the elliptical openings combine to give this bridge an usually graceful appearance. The bridge is also associated with the spread of dense settlement in the town of Norwalk. Throughout the 19th century, growth had been concentrated in the shorefront area that was incorporated as the separate borough of South Norwalk, and the northern end of town remained more thinly populated, with many active farms. By the time this bridge was constructed, in 1912, the northern farmland had begun to give way to suburban growth, stimulated in large part by a trolley line that followed the line of what is today Route 7. In taking on this project, and paying the substantial sum of \$8,500 for the bridge, the town government acknowledged its own new role in response to rapid development.

Major Bibliographic References Town of Norwalk, Annual Report, 1913, p. 3.

Previous documentation on file:

☐ listed on or ☐ eligible for the National Register

date _____

☐ located within listed district

name _____

date of listing _____

☐ contributing ☐ noncontributing ☐ undetermined☐ HAER inventory; page _____☐ local survey☐ known archaeological site nearby: _____**Geographical Data**

UTM Reference

1 8 6 3 1 9 9 0 4 5 5 5 6 4 0

Quadrangle (scale: 1:24000)

Norwalk North

Form Prepared By

name/title Matthew Roth and Bruce Clouette

organization Historic Resource Consultants, Inc.

street & number 55 Van Dyke Avenue

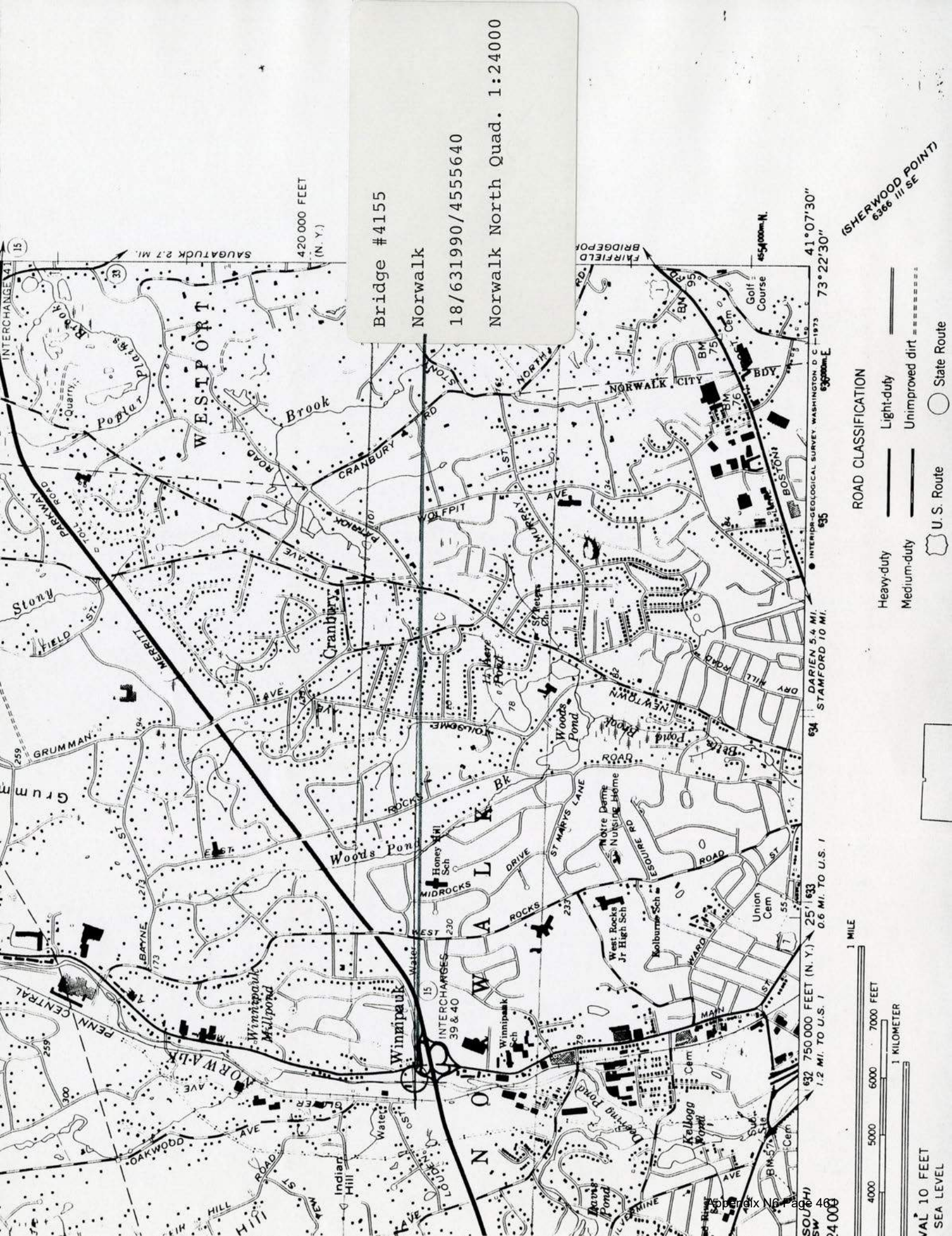
city or town Hartford

date November, 1990

telephone (203) 547-0268

state Connecticut

Appendix N6 Page 4606



Bridge #4155

Norwalk

18/631990/4555640

Norwalk North Quad. 1:24000

ROAD CLASSIFICATION

- Heavy-duty
- Medium-duty
- Light-duty
- Unimproved dirt
- U. S. Route
- State Route

(SHERWOOD POINT)
6366 III SE

1 MILE

4000 5000 6000 7000 FEET

1 KILOMETER

VAL 10 FEET
SEA LEVEL

41°07'30"
73°22'30"

DAREN 5.4 MI.
STAMFORD 10 MI.

634 750 000 FEET (N. Y.)
1.2 MI. TO U. S. I

25' 633
0.6 MI. TO U. S. I

24000



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Bridge #4155
Norwalk

View Southwest
Negative MMM-9



View Northeast
Negative MMM-2





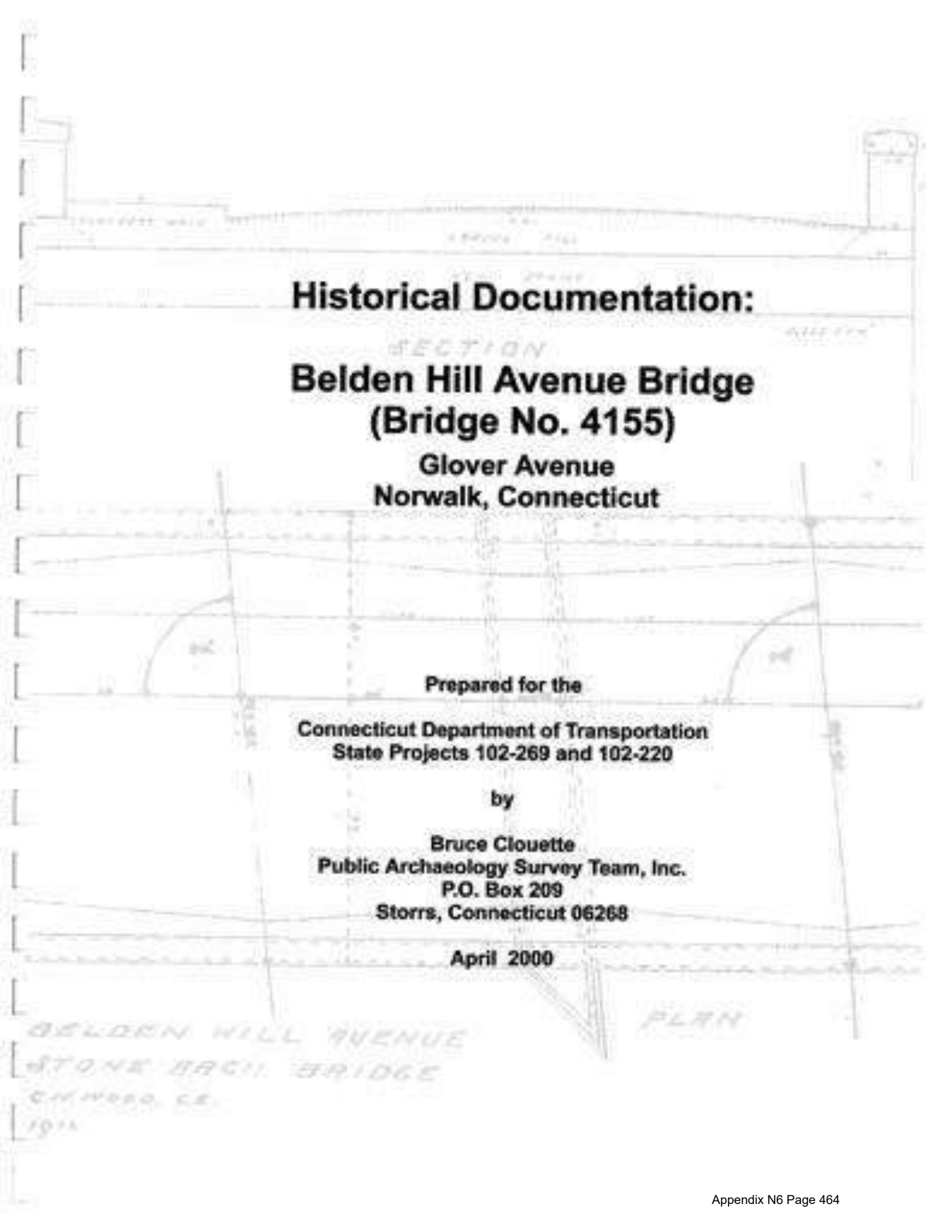
STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Bridge #4155
Norwalk

View Northeast
Negative MMM-7



The background of the page features a faint, large-scale architectural drawing. The top portion shows a cross-section of a bridge with a central span and two side spans, supported by piers. The bottom portion shows a plan view of the bridge, with the main span and approach roads. The drawing is in a technical, line-art style.

Historical Documentation:

Belden Hill Avenue Bridge (Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Prepared for the

Connecticut Department of Transportation
State Projects 102-269 and 102-220

by

Bruce Clouette
Public Archaeology Survey Team, Inc.
P.O. Box 209
Storrs, Connecticut 06268

April 2000

BELDEN HILL AVENUE
STONE ARCH BRIDGE
CHANDLER
1911

PLAN

**Historical Documentation:
Belden Hill Avenue Bridge
(Bridge No. 4155)**

**Glover Avenue
Norwalk, Connecticut**

**Prepared for the
Connecticut Department of Transportation
State Projects 102-269 and 102-220**

by

**Bruce Clouette
Public Archaeology Survey Team, Inc.
P.O. Box 209
Storrs, Connecticut 06268**

April 2000

Historical Documentation: Belden Hill Avenue Bridge (Bridge No. 4155) Norwalk, Connecticut

Bridge No. 4155, originally known as the Belden Hill Avenue Bridge, crosses the Norwalk River just west of Route 7 in the Winnipauk section of Norwalk, Connecticut; today this short section of road is considered part of Glover Avenue, which intersects Oakwood Avenue/Belden Hill Avenue a short distance from the west end of the bridge. Built in 1912 by the Town of Norwalk, the bridge is a two-span masonry-arch structure built of local stone and trimmed with Portland brownstone. The bridge was included in the Connecticut Department of Transportation's 1990 survey of historic highway bridges, in which it was recommended as being eligible for inclusion on the National Register of Historic Places as an example of stone-arch bridge construction.

This documentation was undertaken in connection with the proposed reconstruction of the Route 7/Route 15 Interchange, which lies just south of the bridge, in order to create a permanent record of the bridge and its historical associations. The documentation, which is intended to supplement the existing 1990 inventory form and photographs of the bridge, consists of the following components:

- additional information on the bridge's original appearance
- an expanded statement of significance, based upon additional historical research
- additional bibliographical citations to the *Norwalk Hour* and other primary sources
- copies of the original drawings for the bridge, reproduced from microform in the records of the Norwalk Public Works Department
- twelve 5 x 7" black-and-white photographs of the bridge taken in March 2000, along with an index and site plan

The text has been formatted onto Historic Bridge Inventory Form continuation sheets in order to be consistent with the existing inventory form. The original text and photographs will be submitted to the Connecticut State Historic Preservation Office for permanent archiving.

This documentation was undertaken by Bruce Clouette, historian with Public Archaeology Survey Team, Inc. of Storrs, Connecticut. It fulfills a stipulation in a Memorandum of Agreement between the Federal Highway Administration and the Connecticut State Historic Preservation Office, executed on November 15, 1999. The reconstruction of the Route 7/15 interchange is being undertaken as Federal Aid Project No. NH-7 (106) and State Project Nos. 102-269 and 102-220.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Description:

The bridge's appearance has changed little since the bridge inventory of 1990. However, the following additions and clarifications can be added as a result of the subsequent field evaluation and additional historical research:

- ♦ The south-side brownstone coping includes, at the center of the bridge, a dedicatory tablet inscribed as follows:

Erected -- 1912
Alfred Avison
James A. Brown
John Devine
Selectmen

Charles N. Wood, C.E.

- ♦ The current railings are modern but are probably close in appearance to the bridge's original railings. Although the engineer's drawings show the bridge with cobblestone railings, newspaper reports indicate that these were dropped in favor of a 3-rail tubular railing, 3 1/2 feet high (*Norwalk Hour*, January 3, 1913, p. 12).
- ♦ The current remnants of mortar probably represent a series of repointings rather than any original material. The drawings call for "mortar work" only where the stone is set into the ledge outcropping; the rest is indicated as "dry load."
- ♦ The drawings show a sidewalk on one side only, but it is likely that the current walks on both sides are early if not original, since the *Norwalk Hour* (January 3, 1913, p. 12) mentioned "cement sidewalks."
- ♦ The source of the majority of the stone, a local granitic gneiss, was a nearby quarry on Main Street on what was then known as the "Coleman property." The Portland brownstone for the coping and ring stones was brought in by rail. (*Norwalk Hour*, August 7, 1912, p. 3; August 9, 1912, p. 3).
- ♦ The original road surface was crushed stone.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Statement of Significance:

As noted on the 1990 inventory form, the bridge shows a strong aesthetic intent as well as fulfilling a utilitarian purpose. The Town of Norwalk had earlier replaced at least two other bridges in town with stone arches of a similar type, part of a trend (especially evident in the towns of Fairfield County) which, for lack of a better term, could be called the "Suburb Beautiful" movement. Like the "City Beautiful" movement that was transforming cities at the time, planning efforts in Connecticut's more cosmopolitan towns showed a marked concern for the aesthetic appearance of public works projects. For the most part, however, these towns avoided the overly formal, Neo-Classical designs prevalent in urban areas in favor of a more "natural," even rustic, appearance, as amply illustrated by this bridge.

Norwalk had a professional town engineer to design projects such as the new Winnipauk bridge. Charles N. Wood (1847-1913) was a native of Norwalk who learned surveying and engineering like most members of his generation, by participating in the layout and construction of rail lines; in his early years Wood worked on those of the Boston, Hartford, and Erie, the Massachusetts Central, and the Vineland (New Jersey) Railroads. He gained experience with municipal services as the assistant city engineer in Jersey City in 1869 and came to work in Norwalk around 1880, where he remained until his death, which occurred on March 19, 1913 just three weeks after the Glover Hill Avenue bridge was completed. In addition to laying out streets and designing bridges, Wood created the Norwalk water and sewer systems during his long tenure. He was active in community life as a member of the Masons and Knights Templar. The *Norwalk Hour*, no doubt intending to pay him high praise, observed that "Mr. Wood was a democrat in politics, but not one of the violent kind." (March 19, 1913, p. 1).



*Charles N. Wood, the engineer
who designed the bridge*

Winnipauk was an outlying village within the town on Norwalk that centered around the railroad depot, several stores, and two factories on the Norwalk River that had been built for the production of woollens in the 19th century. In the early 20th century, the completion of the trolley line on Wilton Road (Route 7) linked Winnipauk to the more



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Additions to Statement of Significance (continued):

urbanized parts of town to the south. Winnipauk maintained a separate identity, however, with unique community groups and events and, usually, its own column in the local newspaper, the *Norwalk Hour*.

This circumstance was fortunate for history, since the *Hour's* Winnipauk correspondent filed a series of reports, first daily and then weekly, that chronicled the construction of the bridge in great detail, unusual for any small bridge project of the period. From this source we learn that the contractor for the bridge, Timothy F. Foley of nearby South Norwalk, had four steam derricks devoted to the job: two at the construction site, where foreman Thomas F. Mullens of Westport supervised "a large gang of men," another at the Main Street quarry where stone for the bridge was extracted, and the fourth at the railroad station for unloading the brownstone for the coping and arch rings. The work appears to have been a combination of hand labor and machine assistance. For example, to prepare the bedrock for the footings, a steam derrick was used to raise and lower a large bucket for hauling out manually loaded earth and stone. The bedrock itself was broken up by blasting.

The bridge was built over a seventh-month period. The awarding of the contract was reported in the *Commercial Record* on August 3, 1912; Foley had brought his machinery to the site by August 6; and a temporary bridge for service during construction was ready by August 21. The following month, the abutments and center pier were finished, using stone taken from the bedrock excavation. Despite some unexpected ground water and difficulty maintaining temporary gas lines, the bridge was substantially in place by January 1913, and the *Hour* reported its completion on March 1, 1913.

Although some residents were disappointed that the project did not include lights, the bridge appears to have fulfilled both its practical and scenic functions. No formal dedication was reported in the newspaper, but the *Hour* praised the structure as "a great boon to the Winnipauk community" and "a credit to Winnipauk and the town." (January 3, 1913; March 1, 1913, p. 3).



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Revised Bibliography:

Clouette, Bruce, and Matthew Roth. *Connecticut's Historic Highway Bridges*. Newington, Conn.: Connecticut Department of Transportation, 1991.

Commercial Record, August 3, 1912, p. 18.

Connecticut Department of Transportation. Historic Bridge Inventory, 1990. Original inventory forms deposited with Dodd Research Center, University of Connecticut, Storrs.

Norwalk Hour, July 31, 1912 - March 1, 1913.

Norwalk, Town of. *Annual Report*, 1913, p. 3.

Norwalk, Town of. Public Works Department. Bridge Drawing Files.

Wood, Charles N. Obituary, *Norwalk Hour*, March 19, 1913, p. 1.

_____. Obituary, *Proceedings of the Connecticut Society of Civil Engineers*, 1913, p. 87.



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

Photographs

The following photographs were all taken in March 2000 by Bruce Clouette, historian with Public Archaeology Survey Team, Inc., of Storrs, Connecticut.

1. South elevation of bridge from west bank of Norwalk River, camera facing north
2. South elevation of bridge from east bank of Norwalk River, camera facing northwest
3. North elevation of bridge, camera facing southeast
4. Traffic level from east end, camera facing west
5. Traffic level from west end, camera facing east
6. Detail of water pipe mounted on south elevation, camera facing northwest
7. Detail of cutwater, center pier, north elevation, camera facing east
8. Detail of stonework on underside of arch, west arch, camera facing northeast toward center pier
9. Detail of ring stones, showing added mortar
10. Detail of spandrel stonework and brownstone coping
11. Detail of modern pipe rail, with remnants of original pipe rail visible on top surface of coping stones
12. Detail of dedicatory tablet set into coping, center of bridge, south side

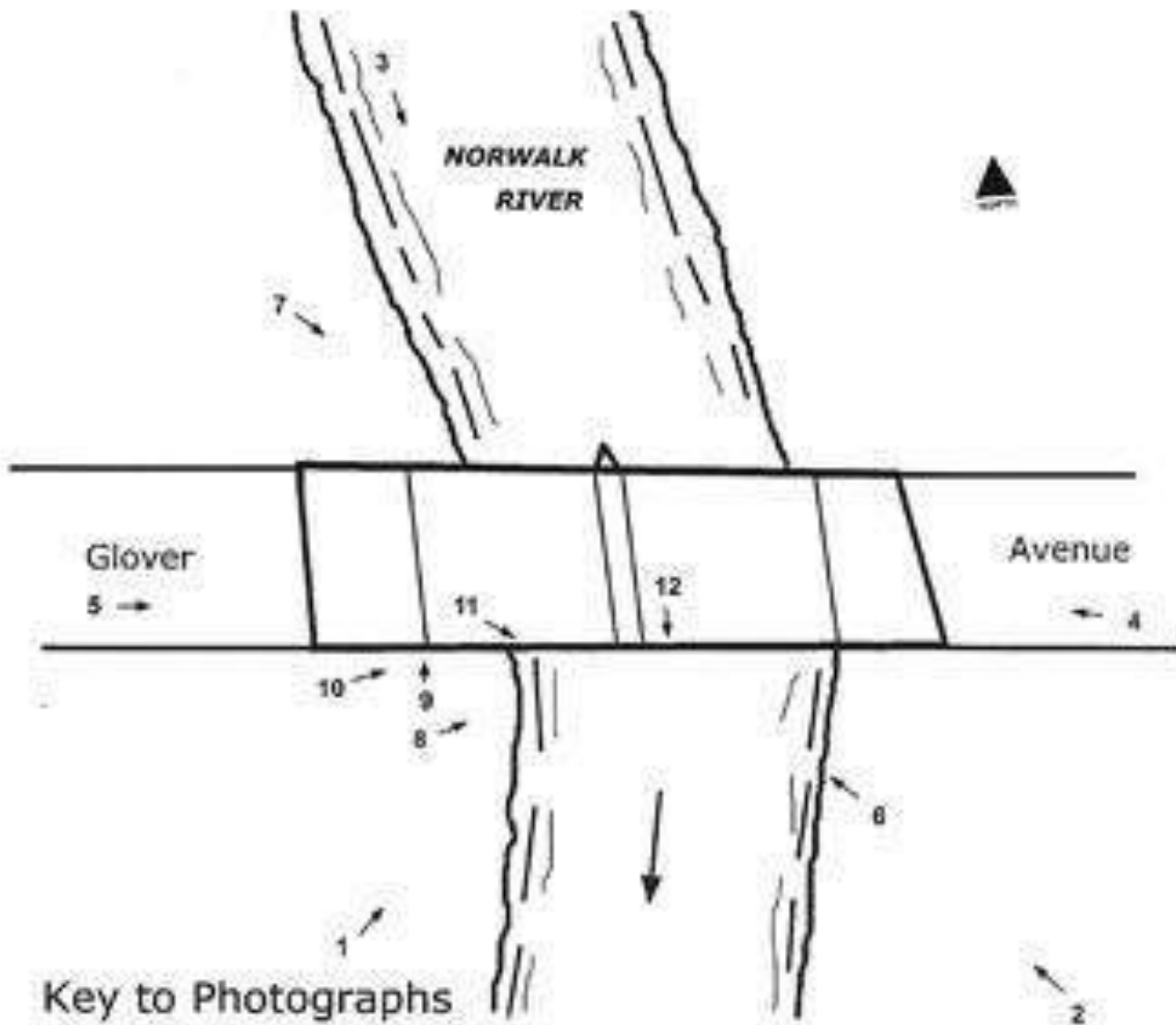


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut





STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



1. South elevation of bridge from west bank of Norwalk River, camera facing north

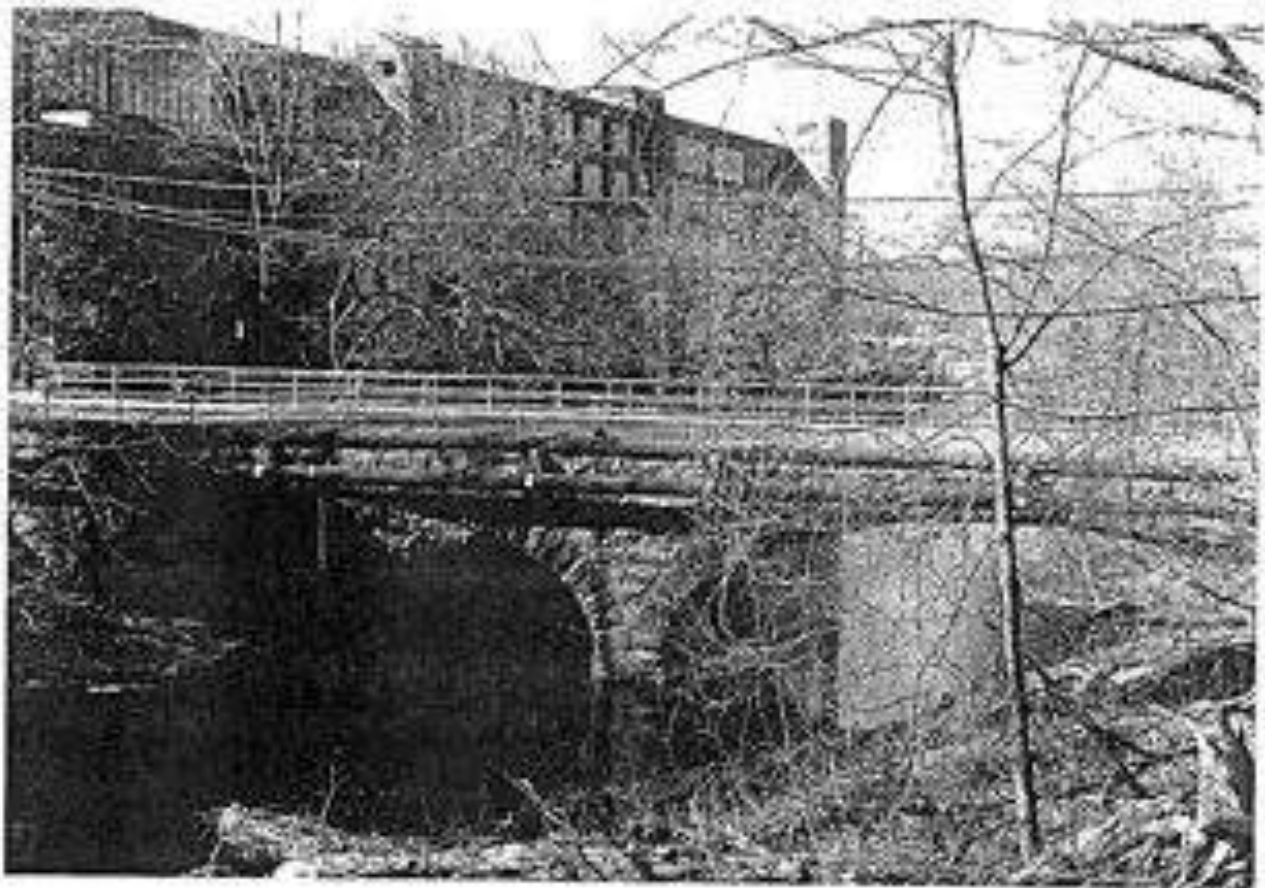


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



2. South elevation of bridge from east bank of Norwalk River, camera facing northwest



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



3. North elevation of bridge, camera facing southeast



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



4. Traffic level from east end, camera facing west

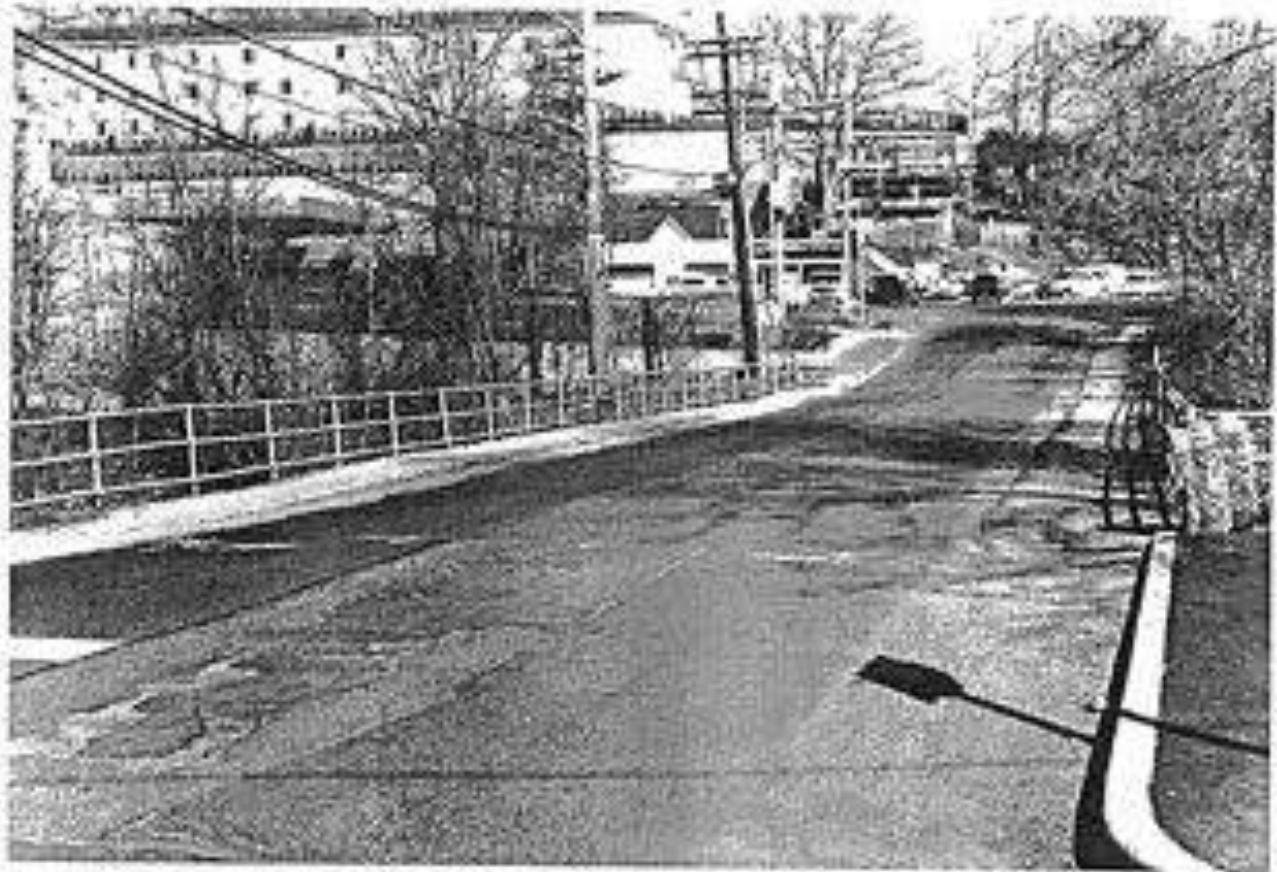


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



5. Traffic level from west end, camera facing east



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



6. Detail of water pipe mounted on south elevation, camera facing northwest

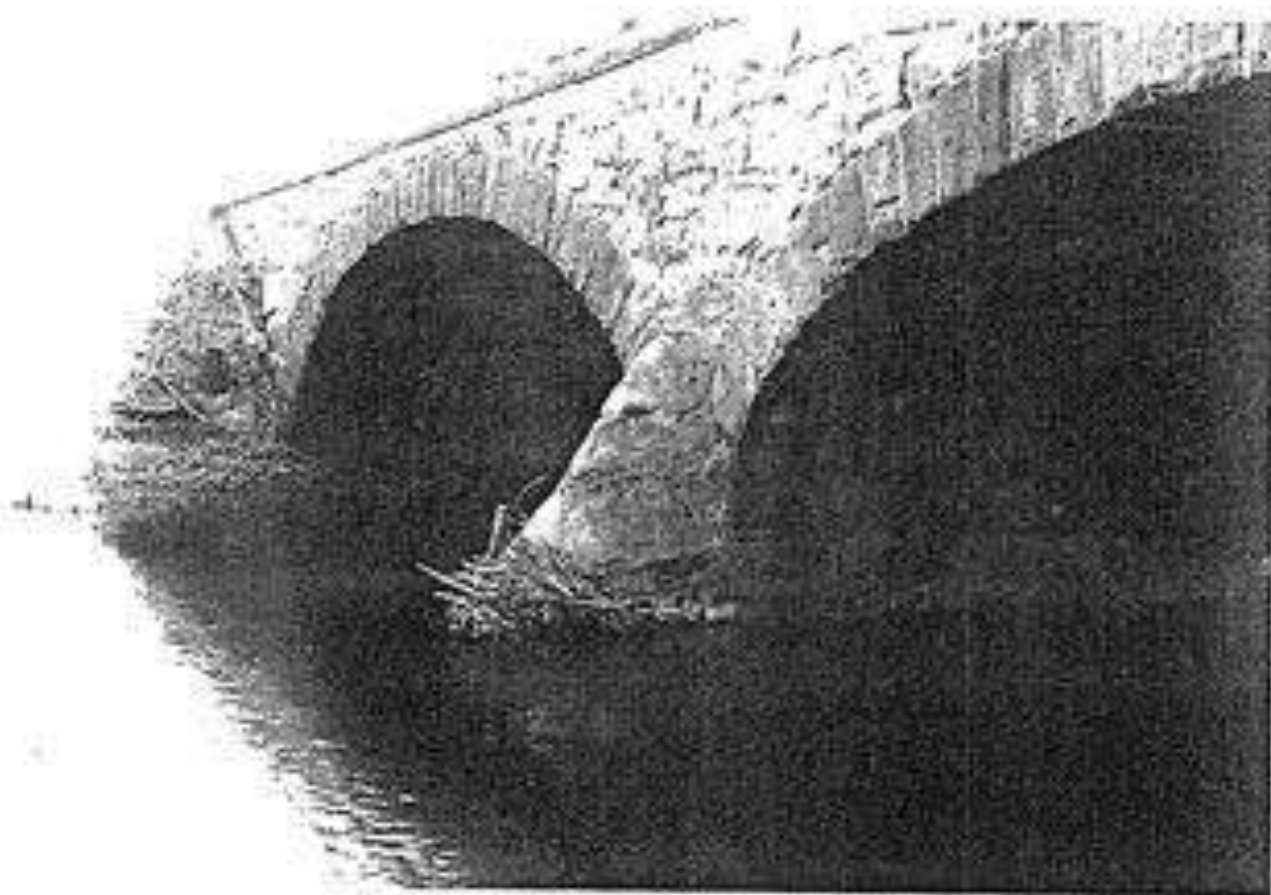


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



7. Detail of cutwater, center pier, north elevation, camera facing east

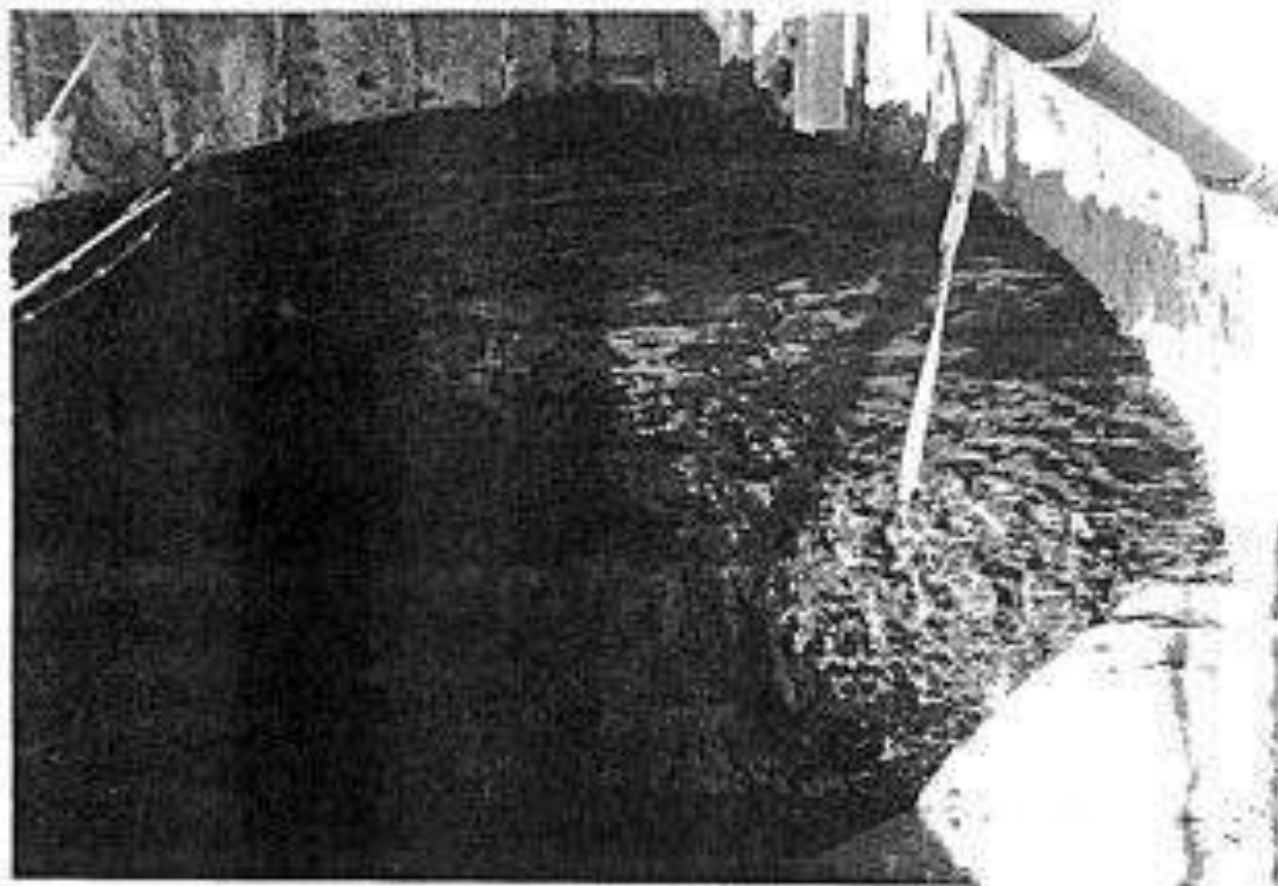


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



8. Detail of stonework on underside of arch, west arch, camera facing northeast toward center pier



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



9. Detail of ring stones, showing added mortar



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



10. Detail of spandrel stonework and brownstone coping

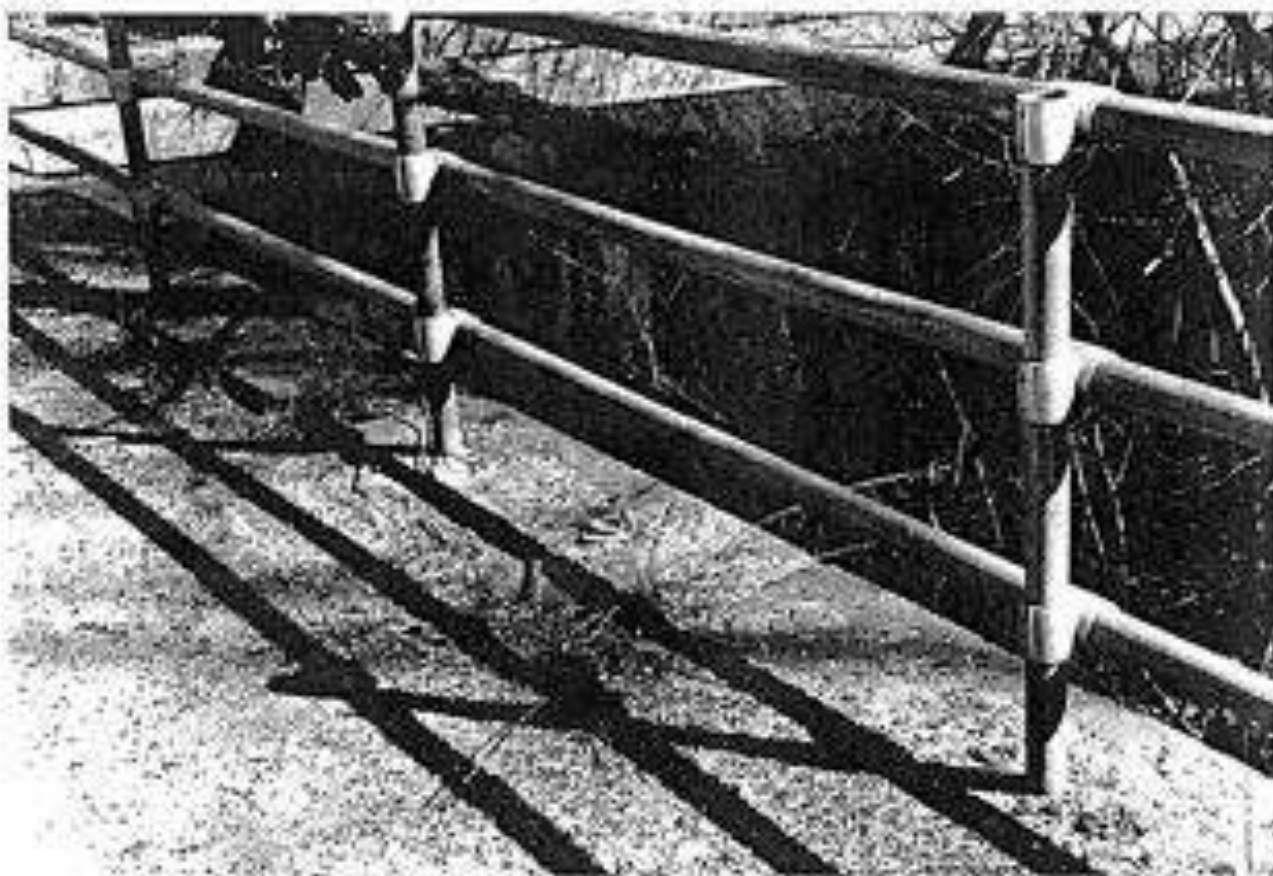


STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



11. Detail of modern pipe rail, with remnants of original pipe rail visible on top surface of coping stones



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut



12. Detail of dedicatory tablet set into coping, center of bridge, south side



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION
HISTORIC BRIDGE INVENTORY FORM



Belden Hill Avenue Bridge
(Bridge No. 4155)

Glover Avenue
Norwalk, Connecticut

List of Original Drawings:

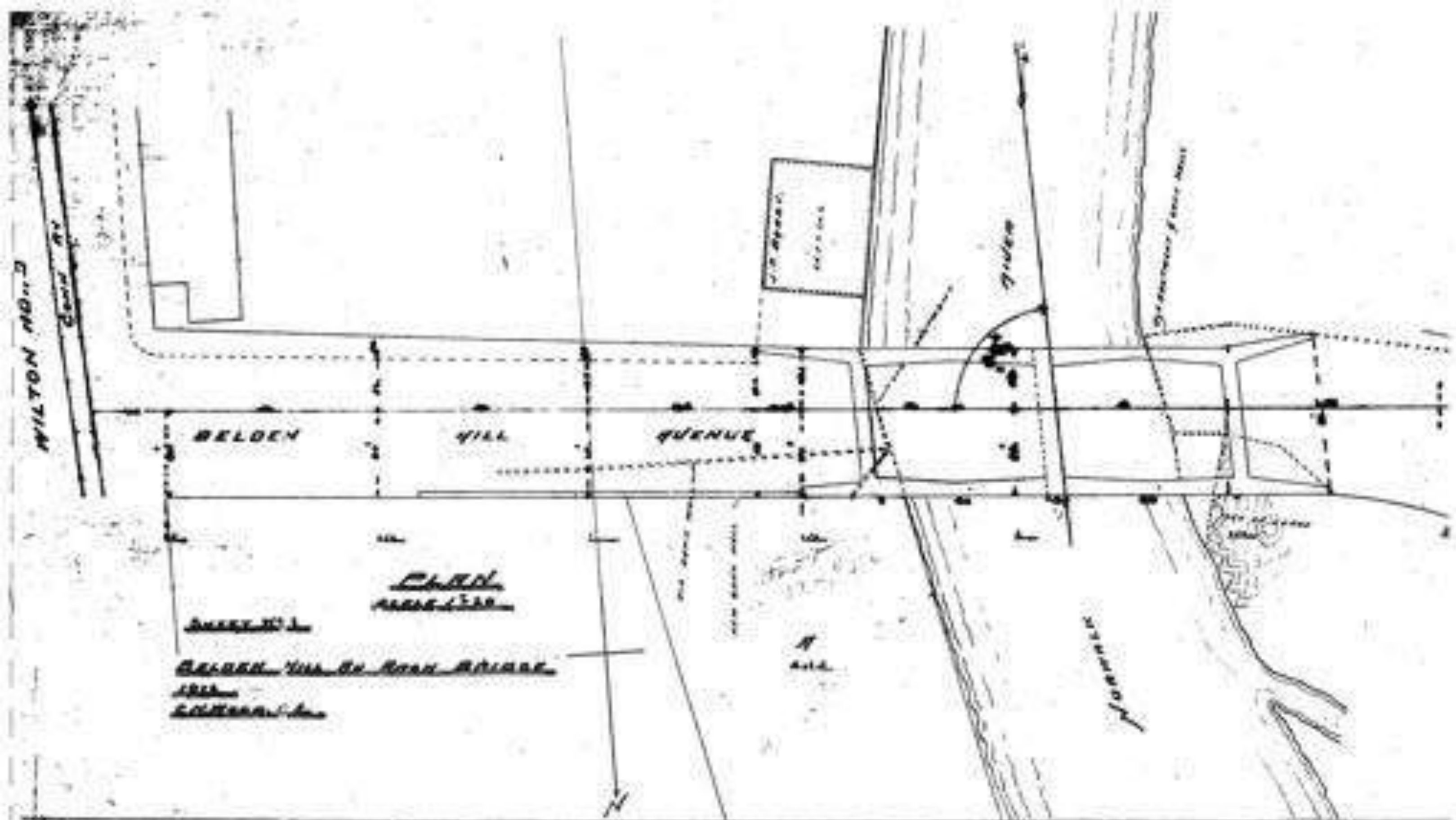
"Plan, Belden Hill, An Arch Bridge, 1912"

"Elevation, Belden Hill Avenue Bridge, 1912"

"Plan for Centers, Belden Hill Avenue Bridge"

"Plan and Section, Belden Hill Avenue Stone Arch Bridge, 1912"

All drawings reproduced from microform, Norwalk Public Works Department.



Correspondence with CT SHPO re: VIAA and
Public Report
August 2020

From: Labadia, Catherine
Sent: Monday, August 24, 2020 10:55 AM
To: McMillan, Mark J.; Kinney, Jonathan; Scofield, Jenny
Cc: Murphy, Lynn D.; Doyle, Thomas H
Subject: RE: Checking in on Route 7/15 Interchange Report

Yes, that was the question and thank you for the answer. I hope your Monday just keeps getting better.
Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Monday, August 24, 2020 10:53 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Cc: Murphy, Lynn D. <Lynn.Murphy@ct.gov>; Doyle, Thomas H <Thomas.Doyle@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Cathy,

Just one clarification on Q/A #2: The VIAA will definitely be in the Appendices of the EA/EIE document.

If I'm reading your question correctly, yes, it will also be an Appendix of the Public Report that will go to the Consulting Parties as part of the §106 evaluation.

Mark

From: Labadia, Catherine <Catherine.Labadia@ct.gov>
Sent: Monday, August 24, 2020 10:39 AM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>
Subject: RE: Checking in on Route 7/15 Interchange Report

Good Morning Mark,

So I do not miss anything, here is a response to each of your questions:

1. SHPO has reviewed the draft report and appreciates the changes, additional images, and text corrections. We have no additional edits or comments at this time.
2. Jenny has not had the opportunity to view the VIAA, but I did a cursory review and the methods are consistent with other visual analysis reports our office receives. We just want to confirm that the VIAA will be included as an appendix for public consideration.
3. Based on the information presented in the VIAA, SHPO concurs with the APE for the undertaking at this early stage of planning.

Let me know if you want any of this in a formal letter or separate communication.

Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Friday, August 21, 2020 5:32 PM
To: Kinney, Jonathan <Jonathan.Kinney@ct.gov>; Scofield, Jenny <Jenny.Scofield@ct.gov>; Labadia,

Catherine <Catherine.Labadia@ct.gov>

Subject: Checking in on Route 7/15 Interchange Report

Good morning Jenny, Cathy, Jonathan,

As I'm winding down my week I have a few items to check in with your office regarding the Cultural Resources Phase I / II report for the Route 7/15 Interchange project (State Project #102-358).

I believe most of these have already been answered, so I'm just looking for a confirmation that we can include in the project files. Specifically:

1. Do you have any formal comments regarding the Cultural Resources Report?
2. Have you had the opportunity to review the Visual Impact Assessment report and do you have any comments?
3. And finally, can I get a written confirmation that SHPO concurs with the APE for this project?

If you haven't had a chance to review these documents or don't concur with the APE boundaries as described, can you let me know?

Thank you,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner

Office of Environmental Planning

Environmental / Historical Documents Unit

Connecticut Department of Transportation

2800 Berlin Turnpike

Newington, CT 06131



(860) 594-2135



(860) 594-3028 - Fax



mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Friday, August 14, 2020 3:25 PM
To: Kinney, Jonathan; Scofield, Jenny
Cc: Labadia, Catherine (Catherine.Labadia@ct.gov)
Subject: Revised Cultural Resources/"Public Report" for State Project 102-358 - Route 7/15 Interchange, Norwalk

Good afternoon, Jenny, Jonathan, Cathy,

Below is a link to the latest (and hopefully FINAL) round of revisions to the Public Report for the Route 7/15 Interchange project in Norwalk. The consultant has made revisions based on SHPO's comments and I'm sending you the latest round to see if the changes meet your office's expectations. I will also send a second link directly from O365, since past experience has shown that embedding a link in an email like this doesn't always work.

https://ctgovexec.sharepoint.com/:b:/s/DOTPPCulturalResourceEnvironmentalDocs/ETuW_RXJxMRGsd_bfKczfNj4BezaTTEHFarFw9ASJ5R1FdA?e=L98Ymc

If you have any questions about the links, the report, or the revisions, please don't hesitate to contact me.

Wishing you a great weekend,

Mark

I am currently teleworking out of the office but am available via email.

If this is an urgent matter, please email me your telephone number and I will contact you.

Stay well!

Mark McMillan

Supervising Transportation Planner
Office of Environmental Planning
Environmental / Historical Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131

☎ (860) 594-2135

☎ (860) 594-3028 - Fax

✉ mark.mcmillan@ct.gov



**Routes 7/15 Interchange
Norwalk, Connecticut
State Project No. 102-358**

**DRAFT
Environmental Assessment and
Environmental Impact Evaluation**

**Appendix I
Visual Impact Study**

June 26, 2020

Prepared for:
Connecticut Department of Transportation
Federal Highway Administration

Table of Contents

1.0	Background and Regulatory Context.....	1.1
2.0	Existing Conditions	2.1
2.1	VISUAL CHARACTER OF THE VIAA.....	2.1
2.2	VISUAL QUALITY OF VIAA.....	2.2
2.3	VIEWER GROUPS AND VIEWER EXPOSURE.....	2.2
2.4	VISUAL ENVIRONMENT OF LANDSCAPE UNITS	2.6
3.0	POTENTIAL VISUAL IMPACTS	3.18
3.1	ALTERNATIVES.....	3.18
3.2	POTENTIAL VISUAL IMPACTS	3.20
4.0	MITIGATION MEASURES.....	4.66

FIGURES

Figure 2.1.1	Visual Impact Assessment Area	1.2
Figure 2.1	Typical Merritt Parkway Visual Character	2.1
Figure 2.2	Typical Route 7 Visual Character	2.1
Figure 2.3	Merritt Parkway East of Main Avenue Interchange	2.3
Figure 2.4	Merritt Parkway Looking North to SB Route 7 Exit and Eversource Power Lines	2.4
Figure 2.5	Route 7 Looking South to Merritt Parkway Overpass	2.3
Figure 2.6	Merritt Parkway Looking North to Exist 39B for Main Avenue	2.7
Figure 2.7	Route 7 Looking South to Exit for Merritt Parkway South	2.7
Figure 2.8	Route 7 Looking South to Bridge over Perry Avenue	2.8
Figure 2.9	Merritt Parkway Looking South; Glover Avenue Apartment Building on Right	2.8
Figure 2.10	Merritt Parkway Mainline Bridge between Ramp Structures over Perry Avenue ...	2.9
Figure 2.11	Route 7 Bridge over Perry Avenue.....	2.10
Figure 2.12	Merritt Parkway - Filtered Views from Rae Lane Residential Backyards.....	2.10
Figure 2.13	West Rocks Road View of Merritt Parkway, looking North	2.11
Figure 2.14	Creeping Hemlock Drive, view south to Merritt Parkway	2.12
Figure 2.15	Lakewood Drive View South to Creeping Hemlock Drive and Merritt Parkway	2.12
Figure 2.16	Main Avenue Looking North to Merritt Parkway Mainline Bridge.....	2.13
Figure 2.17	Main Avenue Looking North to Merritt Parkway Mainline Bridge.....	2.14
Figure 2.18	Main Avenue, Looking North toward Merritt Parkway	2.14
Figure 2.19	Main Avenue North of Merritt Parkway; Looking South	2.15
Figure 2.20	Glover Avenue Looking North toward Metro-North Merritt 7 Train Station.....	2.15
Figure 2.21	Glover Avenue Bridge over the Norwalk River, Looking toward Main Avenue	2.16

Figure 2.22 Merritt Parkway Mainline Bridge over Norwalk River, Viewed from Glover Avenue Bridge	2.16
Figure 2.23 Merritt Parkway Mainline Bridge over Danbury Branch Metro-North Track, Viewed from Glover Avenue.....	2.17
Figure 3.1 Visual Impact Assessment Viewpoint Locations – Alternative 26	3.21
Figure 3.2 Visual Impact Assessment Viewpoint Locations - Alternative 21D	3.21
Figure 3.3 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Existing View	3.23
Figure 3.4 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 21D	3.24
Figure 3.5 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 26.....	3.24
Figure 3.6 Viewpoint #2 – View Looking North on Route 7 – Existing View	3.26
Figure 3.7 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 21D	3.27
Figure 3.8 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 26	3.27
Figure 3.9 Viewpoint #3 – View Looking North on Route 7 – Existing View	3.29
Figure 3.10 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 21D	3.29
Figure 3.11 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 26	3.30
Figure 3.12 Viewpoint #4 – View Looking North on Main Avenue – Existing View	3.32
Figure 3.13 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 21D	3.32
Figure 3.14 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 26	3.33
Figure 3.15 Viewpoint #5 – View Looking South on the Merritt Parkway – Existing View	3.34
Figure 3.16 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D	3.35
Figure 3.17 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26.....	3.35
Figure 3.18 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Existing View ..	3.37
Figure 3.19 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 21D	3.38
Figure 3.20 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 26.....	3.38
Figure 3.21 Viewpoint #7 – View Looking South on the Merritt Parkway – Existing View	3.40
Figure 3.22 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D	3.41
Figure 3.23 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26.....	3.41

Figure 3.24 Viewpoint #8 – View Looking South on Main Avenue – Existing View	3.42
Figure 3.25 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 21D	3.43
Figure 3.26 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 26.....	3.43
Figure 3.27 Viewpoint #9 – View Looking East on Glover Avenue – Existing View.....	3.45
Figure 3.28 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 21D	3.45
Figure 3.29 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 26.....	3.46
Figure 3.30 Viewpoint #10 – View Looking South From Glover Avenue – Existing View	3.48
Figure 3.31 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 21D	3.48
Figure 3.32 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 26.....	3.49
Figure 3.33 View Looking South on Route 7 – Existing View.....	3.51
Figure 3.34 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 21D	3.51
Figure 3.35 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 26	3.52
Figure 3.36 Viewpoint #12 – View Looking South on the Merritt Parkway – Existing View	3.53
Figure 3.37 Viewpoint #12 – View Looking South on the Merritt Parkway –	3.54
Figure 3.38 Viewpoint #12 – View Looking South on the Merritt Parkway –	3.54
Figure 3.39 Viewpoint #13 – View Looking North on Route 7 – Existing View	3.56
Figure 3.40 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 21D	3.57
Figure 3.41 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 26	3.57
Figure 3.42 Viewpoint #14 – View Looking South on Route 7 – Existing View	3.59
Figure 3.43 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 21D	3.59
Figure 3.44 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 26	3.60
Figure 3.45 Viewpoint #15 – View Looking North on Perry Avenue – Existing View	3.62
Figure 3.46 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 21D	3.62
Figure 3.47 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 26.....	3.63
Figure 3.48 Viewpoint #16 – View Looking South on Perry Avenue – Existing View	3.64
Figure 3.49 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 21D	3.65

Figure 3.50 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 26.....	3.65
---	------

1.0 BACKGROUND AND REGULATORY CONTEXT

A Visual Impact Assessment (VIA) was conducted according to the FHWA *Guidelines for the Visual Assessment of Highway Projects (2015)* [1]. Information was collected through desktop review and site visits. The VIA components included:

1. Establishing the existing visual environment by defining and identifying the study area, its visual character, key visual resources, the key viewers and their sensitivities to their context and adjacent areas;
2. Identifying the key views and the range of significant visual resources for each viewer group;
3. Identifying historic sites, buildings and other resources within the visual study area and evaluate the potential for impact by the project alternatives on views;
4. Preparing visual simulations to depict existing conditions and compare them to the design alternatives as seen from key viewpoints at the completion of the project, and;
5. Assessing the visual impacts of each design alternative including changes to significant visual resources and probable viewer response to these changes.

Based on a review of area mapping and project documentation, including prior visual analyses, several primary areas were identified where the existing viewers and viewer groups and their current visual environments could potentially be affected by the proposed project alternatives. These locations include:

1. views of the proposed improvements in both directions of the Merritt Parkway and Route 7;
2. views of the Merritt Parkway along Main Avenue in both directions towards the Project;
3. views of the Merritt Parkway, Route 7 and alterations to the local streets from streets in surrounding residential neighborhoods: Indian Hill Road, Perry Avenue, Rae Lane, April Lane, Linden Lane, Linden Heights, Skyview Lane, West Rocks Road, Creeping Hemlock Drive, Lakewood Drive, Silent Grove Court, Seir Hill Road and North Seir Hill Road.

In addition, significant views of the Project were identified:

1. from commercial areas along Main Avenue south of the Merritt Parkway northward from Linden Street and north of the Merritt Parkway looking south along Glover Avenue near the Metro-North train station; and

2. to and from the Norwalk River near Glover Avenue.

The study area, or Visual Impact Assessment Area (VIAA) consists of the Project Site and immediately adjacent neighborhoods. Affected viewer groups in these areas will primarily include residents, retail and office workers and motorists (Figure 2.1.1).

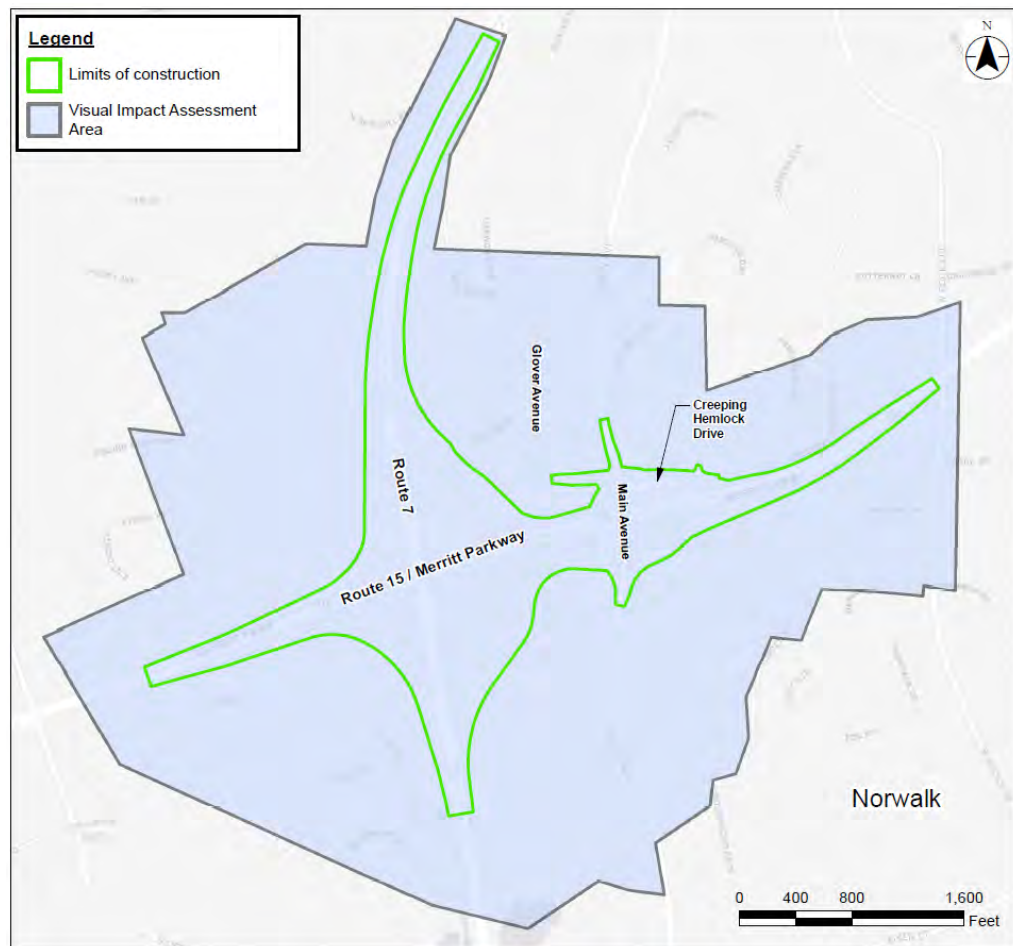


Figure 2.1.1 Visual Impact Assessment Area

Photo locations for the VIA were selected to represent historic, environmental, and neighborhood character resources, including:

- the Merritt Parkway;
- Historic bridges;
- Residential neighborhoods;
- Environmental settings, and;
- Community settings.

Keys to photo locations are provided in Figure 3.1 and Figure 3.2. Additional photos are provided in the Cultural Resources Assessment Appendix.

2.0 EXISTING CONDITIONS

2.1 VISUAL CHARACTER OF THE VIAA

The visual character of the VIAA is of a suburban/semi-rural nature with built-up commercial and retail zones, typical suburban residential neighborhood developments and semi-rural wooded areas that are older and less densely populated. The visual character exhibited by both the Merritt Parkway and Route 7 is of a limited access, multi-lane, high speed roadway located within a rolling, wooded landscape with occasional views to the surrounding context. The visual character specific to the Merritt Parkway, with its unique bridge architecture, horizontal and vertical alignment and programmed landscape views from the roadway, contribute to it being listed on the NRHP (Figure 2.1). Route 7 within the VIAA has the visual character typically associated with a limited access interstate highway (Figure 2.2). Substantial rock outcrops and changes of grade exist along Route 7 and within the cloverleaf ramps of the Merritt Parkway/Route 7 interchange (Figure 2.5).



Figure 2.1 Typical Merritt Parkway Visual Character



Figure 2.2 Typical Route 7 Visual Character

2.2 VISUAL QUALITY OF VIAA

While the Merritt Parkway landscape context has been altered since its high point in the 1950s, the overall visual quality of the VIAA is still reasonably good with many of the noteworthy natural and man-made features that originally comprised the Parkway's character are still observed throughout. In various segments of the roadway, particularly where a program of safety improvement projects including the clearing of vegetation closest to the edge of pavement and other shoulder upgrades is being instituted, the Parkway's visual character is in transition. While these safety improvements have altered the Parkway's current visual quality, the landscape will rebound. Good general upkeep of facilities and properties is evident in certain areas, and maintenance appears to be performed fairly regularly.

2.3 VIEWER GROUPS AND VIEWER EXPOSURE

Four major viewer group types have been identified based on observations of land use and circulation patterns. While some of these viewer groups share similar if not identical views, the groups differ in their degree of sensitivity to the surrounding views due to the viewer's activity, awareness and duration of viewing time. These viewer groups include:

- Motorists on the Merritt Parkway and Route 7;
- Motorists on Local Streets;
- Residents and Pedestrians, and;
- Retail, Commercial and Office Workers and Customers.

Motorists on the Merritt Parkway and Route 7

With an annualized average volume of 85,900 vehicles using the north and southbound Merritt Parkway and 41,500 using the north and southbound Route 7 on a daily basis, motorists traveling through the project site make up the project's largest viewer group and have the greatest viewer exposure to the project's effects.

The area of the intersection of the Merritt Parkway and Route 7 occurs at the bottom of a dip in the Merritt Parkway's alignment (Figure 2.3).

Drivers heading north on the Parkway get their first glimpse of the overall VIAA and of the interchanges just after they crest the hill immediately east of the Exit 39A exit ramp gore area. Similarly, drivers travelling south on the Parkway get their initial view of the overall project and interchanges area as they round the curve in the Parkway west of the West Rocks Road overpass, east of Exit 40B for Route 7 North, Creeping Hemlock Drive and Main Avenue.



Figure 2.3 Merritt Parkway East of Main Avenue Interchange

Drivers travelling northbound on Route 7 first see the overpass that carries the Merritt Parkway over Route 7 from the area near the Exit 3 ramp gore that takes northbound Route 7 motorists to the Merritt Parkway southbound.

Drivers travelling southbound on Route 7 first see the overpass that carries the Merritt Parkway over Route 7 from a location just north of the Exit 3 ramp gore that takes southbound Route 7 motorists to the Merritt Parkway southbound. The duration of views for all motorists varies and depends on their speed of travel (Figure 2.4). A prominent component of the existing visual



Figure 2.4 Route 7 Looking South to Merritt Parkway Overpass

landscape is the existing Eversource overhead high-tension power lines that run parallel to Route 7 north of the Merritt Parkway then cross the Merritt Parkway in the vicinity of the current exit and entrance ramps between the Merritt Parkway northbound to Route 7 southbound and Route 7 southbound to the Merritt Parkway southbound (Figure 2.5).



Figure 2.5 Merritt Parkway Looking North to SB Route 7 Exit and Eversource Power Lines

Summary: Motorists on the Merritt Parkway and Route 7

Sensitivity Low to Medium

Duration of View Duration is a function of travel speeds and proximity of vegetation to the viewer. For example, at 50 MPH, a view $\frac{1}{4}$ mile away would be seen for 18 seconds

Motorists on Local Streets

There are two distinct types of local streets within the VIAA:

- Main Avenue, which is a minor urban arterial road that carries 13,200 vehicles daily north of the Merritt Parkway Interchange and 20,900 vehicles daily south of the Merritt Parkway interchange, and;
- local streets in the surrounding residential neighborhoods immediately adjacent to the project.

In either case, motorists traveling the local streets can view the Merritt Parkway and Route 7 as major visual elements within the landscape depending on their specific location. Again, the duration of views for all motorists varies and depends on their location, speed of travel, the narrowness or openness of the view and whether the viewer is actively engaged with the surrounding landscape or if the landscape is only a passing visual backdrop to other activities.

Summary: Motorists on Local Streets

Sensitivity Medium to High

Duration of View Medium, varies with viewshed limits and travel speeds

Residents and Pedestrians

Residents are the most sensitive to changes in their personal environment. The density of the neighborhood, the amount of space between the buildings, the height of the surrounding buildings, the presence or absence of mature trees on private and public property, the distance as well as the elevation of their property relative to the project site all affect their views to the surrounding landscape. The degree of visual sensitivity to negative changes increases with proximity to the Project and with the transparency of the views of the project's features.

Pedestrians within the VIAA experience essentially similar views as residents. The views exist in the same neighborhoods though they are sometimes experienced while moving as their point-of-view varies.

Summary: Residents

Sensitivity	High
Duration of View	Long

Summary: Pedestrians

Sensitivity	Medium to High
Duration of View	Short to Medium

Commercial and Office Workers and Customers

The view sensitivity for Commercial and Office Workers and Customers varies depending on their specific view location and duration. Sites closer to the project site may have a view of the existing highways while sites farther currently do not. Commercial and office workers generally come to the same location on a daily basis and may use either the Merritt Parkway or Route 7 for a portion of their trip. Once inside their place of work, their awareness of either the Merritt Parkway or Route 7 may be limited to an occasional view out a window or brief moments outside. Retail customers may be aware of either roadway as a component in the background that they may have seen while traveling to the shopping destination on one of the local streets mentioned above. Their attention is usually focused on the task at hand and they may be only marginally aware of the landscape beyond.

Summary: Commercial and Office Workers and Customers

Sensitivity	Medium to Low
Duration of View	Medium to Short

2.4 VISUAL ENVIRONMENT OF LANDSCAPE UNITS

FHWA guidelines [1] defines Landscape Units as, “Defined areas within the [Area of Visual Effect] that have similar visual features and homogeneous visual character and frequently, a single viewshed. An ‘outdoor room.’ Typically, the spatial unit used for assessing visual impacts.” This VIA identifies three landscape units:

- Motorists on the roadways and the immediate spaces flanking the Merritt Parkway or Route 7;
- Neighborhoods and Local Streets Immediately Surrounding the Project site; and
- Commercial and Retail Areas within the Project limits.

This section provides an analysis of each of the three landscape units, including for each unit:

- a general description of the unit;
- the viewer group(s) considered;
- the viewer’s perspectives (viewer position);
- the features viewed by each group, and;
- comments on the quality of the view.

Landscape Unit #1: Motorists on the Merritt Parkway or Route 7

Motorists traveling on either the Merritt Parkway or Route 7 experience mostly a limited-access highway situated within a rolling rural landscape. Vehicles on the Merritt Parkway are limited to passenger cars, noncommercial vehicles with combination plates and motorcycles only. Route 7 permits passenger cars, motorcycles, trucks and busses. Neither facility allows bicycles, tractors or pedestrians.

Perspective: All views are from inside a motor vehicle, either driving or observing as a passenger.

Features: The Merritt Parkway’s horizontal and vertical alignment, overpass structures and its programmed views and integration into its surrounding landscape are all contributing resources towards its listing on the NRHP. The roadway features and context of Route 7 is more typical of that seen on an interstate highway in the New England region.

View Quality: The view quality is mostly high for the Merritt Parkway as it enjoys a semi-rural setting and views from the road relate the facility to its context. Route 7 north of the Merritt Parkway enjoys a similar setting with flanking wooded areas and rock out crops. South of the Parkway, the visual character is more typical of an urban freeway. Whether north or south of the Merritt Parkway, the perceived scale of Route 7 with its larger footprint, is inherently larger than that of the Merritt. Even with many similarly shared roadway elements, Route 7 appears similar to an interstate with its wider lanes, shoulders and curves. The Merritt Parkway, even in the recently “improved” areas, still retains much more of its original cars-only parkway feel. (Figure 2.6, Figure 2.7 and Figure 2.8).



Figure 2.6 Merritt Parkway Looking North to Exist 39B for Main Avenue



Figure 2.7 Route 7 Looking South to Exit for Merritt Parkway South



Figure 2.8 Route 7 Looking South to Bridge over Perry Avenue

Landscape Unit #2: Neighborhoods and Local Streets Immediately Surrounding the Project Site

The neighborhoods and features that immediately surround the project site include the Silvermine neighborhood, which is located on both the north and south sides of the Merritt Parkway west of Route 7. Other local streets in the immediately project surroundings include the following: Indian Hill Road, Perry Avenue, Rae Lane, April Lane, Linden Heights, Skyview Lane, West Rocks Road, Creeping Hemlock Drive, Lakewood Drive, Silent Grove Court and North Seir Hill Road. All are generally in suburban residential neighborhoods with mostly low-scale buildings with the exception of the newly constructed five-story apartment building situated between the southbound Merritt Parkway, the Norwalk River, the Metro-North track and Glover Avenue (see Figure 2.9).



Figure 2.9 Merritt Parkway Looking South; Glover Avenue Apartment Building on Right

Viewer Groups: Residents and Pedestrians, Motorists on Local Streets

Perspective: Residents and pedestrians and motorists on local streets within the areas immediately surrounding the project site have a variety of views of the existing Merritt Parkway and/or Route 7 depending on location, distance to the roadways, neighborhood density, vegetation and topography. Residents on North Seir Hill Road have fleeting glimpses of Route 7 while areas of Perry Avenue south of April Lane have more sustained views of Route 7.

Residents and motorists on Perry Avenue have views of the structure that carries the Merritt Parkway and associated on- and off-ramps over Perry Avenue. The aesthetic treatment of the historic mainline Merritt Parkway bridge over Perry Avenue is typical of the historic structures of the Merritt Parkway while the two flanking ramp structures exhibit none of the distinctive architectural detailing seen on the mainline span.

The mainline structure is a rigid frame concrete bridge and the two flanking ramp structures are stub abutment precast concrete single span girder-type structures from a much more recent period of bridge design. Because the original Merritt Parkway mainline structure is between the two newer bridges and with all three at about the same elevation, viewers can only see the middle structure when they are much closer to it. The parallel ramps obstruct approach views of the entire Merritt Parkway bridge elevation in both directions on Perry Avenue. The two outer ramp structures are much more visible in the landscape from a farther distance and for a longer duration (see Figure 2.10).



Figure 2.10 Merritt Parkway Mainline Bridge between Ramp Structures over Perry Avenue

Residents and motorists on Perry Avenue also have views of the overpass structure that carries Route 7 over Perry Avenue. The mainline Route 7 structure is a stub abutment precast concrete single span girder-type structure similar to the two structures that carry the Merritt Parkway ramps over Perry Avenue that exhibit an aesthetic from a much more recent period of bridge design (see Figure 2.11).



Figure 2.11 Route 7 Bridge over Perry Avenue

Several residential properties on Rae Lane have backyards with views of the northbound mainline and Exit 39A ramp of the Merritt Parkway. A vegetative buffer of 50 to 150 feet exists between the properties and the Parkway's edge of pavement and filtered views of the roadway's light poles and signage are present (Figure 2.12).



Figure 2.12 Merritt Parkway - Filtered Views from Rae Lane Residential Backyards

Residents in the Linden Heights and Skyview Lane neighborhood have very limited views of the Merritt Parkway, for the most part only from the backyards of a limited number of homes on those streets. The homes are at a higher elevation than the Parkway and are separated from

the Parkway by a substantial vegetative buffer. There are no views of the Merritt Parkway from either of the actual streets.

Residents and pedestrians and motorists on West Rocks Road have only a very limited view of the Merritt Parkway until almost on the overpass of West Rocks Road over the Merritt Parkway. The buffering vegetation that exists right up to the overpass filters most views of the Parkway. There is a sidewalk on the west side of the West Rocks Road overpass where pedestrians and bicyclists can observe the Parkway for as long as they wish, although typical overpass chain link bridge fencing on the parapet somewhat obscures the view of the Parkway. A view of the overpass's architectural detailing is not available from this perspective (Figure 2.13).



Figure 2.13 West Rocks Road View of Merritt Parkway, looking North

Residents and pedestrians and motorists on Creeping Hemlock Drive, Lakewood Drive and Silent Grove Court have filtered views of the Merritt Parkway from both their homes and from the streets. Creeping Hemlock Drive in particular is at roughly the same vertical elevation as the Parkway and is in close horizontal proximity to the southbound lanes of the Merritt where the buffering vegetation, primarily deciduous, between the local street and the Parkway at its narrowest is only approximately 50 feet (see Figure 2.14 and Figure 2.15).



Figure 2.14 Creeping Hemlock Drive, view south to Merritt Parkway



Figure 2.15 Lakewood Drive View South to Creeping Hemlock Drive and Merritt Parkway

Several multi-unit residential buildings located off North Seir Hill Road are on an elevated site that can overlook sections of Route 7.

Features: Features in this district include single and multi-family dwellings on tree-lined suburban streets and semi-rural roads that wind through wooded areas.

View Quality: The view quality from the neighborhoods immediately surrounding the project site is generally high. Views of the Merritt Parkway and Route 7, when seen, reduce the visual quality somewhat. Views in wintertime, after deciduous trees drop their leaves, are somewhat more pronounced.

Viewer Group: Motorists on Local Non-Residential Streets

Perspective: Motorists along Main Avenue heading north or south have views of the Merritt Parkway mainline directly in front of them.

Features: On this four-lane local arterial roadway, motorists are surrounded primarily by a commercial shopping strip with businesses on both sides. Motorists on Main Avenue have direct views of the historic Merritt Parkway mainline bridge over Main Avenue which is the primary visual resource in this district (Figure 2.16 and Figure 2.17).

View Quality: Except for the view of the historic Merritt Parkway mainline bridge over Main Avenue, the overall visual quality in this area is unremarkable.



Figure 2.16 Main Avenue Looking North to Merritt Parkway Mainline Bridge



Figure 2.17 Main Avenue Looking North to Merritt Parkway Mainline Bridge

Landscape Unit #3: Commercial and Retail Areas Within the Project Limits

Both Main Avenue and Glover Avenue have major retail and commercial buildings present as well as several larger residential buildings. The retail shopping district along Main Avenue south of the Merritt Parkway is a local and regional destination with food, restaurant, banking, fitness, automotive services and hard goods stores located there. Typically, users arrive by car and park in parking lots in front of the stores. There are several stand-alone single business buildings as well as several groupings of buildings that have multiple stores in each. Several commercial office buildings are also located within this corridor (Figure 2.18).



Figure 2.18 Main Avenue, Looking North toward Merritt Parkway

North of the Merritt Parkway, there are primarily entrances to the commercial buildings that also front Glover Avenue and several hotel properties. With the exception of a gas station, no

retail establishments are present (Figure 2.19). The visual character is less developed.



Figure 2.19 Main Avenue North of Merritt Parkway; Looking South

The commercial corridor along Glover Avenue consists of a series of eight to twelve-story commercial office buildings along the east side of the street and a series of low, one and two-story commercial buildings with higher commercial buildings along the west side of the street. Glover Avenue is also the location where the Metro-North New Haven Line's Danbury Branch railroad track crosses under the Merritt Parkway and Glover Avenue. It is also the location of the Merritt 7 train station parking lot and low-level platform (Figure 2.20).



Figure 2.20 Glover Avenue Looking North toward Metro-North Merritt 7 Train Station

The historic Glover Avenue bridge over the Norwalk River is a visual resource within this district as is the view from Glover Avenue of the Merritt Parkway mainline bridges over the Norwalk River and the Metro-North track (Figure 2.21, Figure 2.17 and Figure 2.23).



Figure 2.21 Glover Avenue Bridge over the Norwalk River, Looking toward Main Avenue



Figure 2.22 Merritt Parkway Mainline Bridge over Norwalk River, Viewed from Glover Avenue Bridge



Figure 2.23 Merritt Parkway Mainline Bridge over Danbury Branch Metro-North Track, Viewed from Glover Avenue

Perspective: Points of view vary by location and distance from and height above the Merritt Parkway or Route 7 and depend on whether the viewer is indoors or outdoors. Views by office workers from upper floors can be sustained and similar to the experience a resident may have from their home. The visual experience of most retail users is mostly fleeting and secondary to other objectives.

Features: Depending on what floor the observer is on, the contextual features in closer proximity to the observer are usually of more interest and importance to the viewer than the project site in the distance.

View Quality: The quality of the views in this district is very mixed due to the commercial and retail nature of the area. The most notable visual resources in this district are the series of similarly styled white, eight to twelve-story office buildings that line the east side of Glover Avenue and the historic Merritt Parkway. Due to the varying building heights and the large footprints of the commercial buildings, views of the neighboring office buildings and rooftops generally detract from the overall visual experience of the district.

3.0 POTENTIAL VISUAL IMPACTS

3.1 ALTERNATIVES

Introduction

Through the Alternatives Selection process, in addition to the No-Build Alternative, two build alternatives, Alternative 21D and Alternative 26, have been identified as sufficiently viable to move forward for further analysis.

Under the No-Build Alternative, the Project would not be constructed and potential Project-related impacts to view quality within the VIAA would not occur. Of note, while the Merritt Parkway landscape context has been altered since its high point in the 1950s, the overall visibility of several of the noteworthy natural and man-made features that originally comprised the Parkway's character are still intact and contributing to the visual character of the Parkway. Good general upkeep of facilities and properties is evident in certain areas, and maintenance appears to be performed fairly regularly. Various segments of the roadway safety improvement projects include the clearing of vegetation closest to the edge of pavement and shoulder upgrades. While these safety improvements have altered the Parkway's current visual quality, the safety improvement program also includes a program of restoring the landscaping to its pre-construction conditions.

However, it is noted that the existing visual environment of the Parkway which constitutes the No-Build Alternative includes views that have been altered since the Parkway was originally conceived and executed. Many important viewsheds that were part of the Parkway's original visual character have changed since the roadway's creation. For example, within the VIAA, the addition of the Merritt View office building and the One Glover Apartments residential building into the immediate landscape of the Parkway have altered and degraded the visual character of the road from its original conception. Under the No-Build Alternative, Project-related mitigation to enhance the landscape and scenic resources would not be necessary.

The two build alternatives are described below.

Alternative 21D

Alternative 21D proposes completing the partial interchange (Interchange 39, 40) with traffic movements between Route 7, the Merritt Parkway, and Main Avenue. The existing Route 7/Merritt Parkway loop ramps would be retained in the easterly quadrants and the direct connections in the westerly quadrants. The four remaining Route 7/Merritt Parkway interchange movements would be achieved with semi-direct connections involving ten new bridges. Several towers of a power line may require relocation.

The location and configuration of the Merritt Parkway interchange with Main Avenue would enable connections between Main Avenue and Route 7 while efficiently accommodating traffic volumes there. The four tight-loop ramps would be eliminated or improved. Elimination of the existing ramps in the southwest quadrant of the Main Avenue interchange would allow for a long eastbound weaving lane between an eastbound Route 7 entry ramp and an improved exit loop ramp in the southeast quadrant of the Route 7 interchange.

In the westbound direction, the tight Merritt Parkway exit loop ramp in the northwest quadrant (to southbound Main Avenue) would be eliminated. Longer Merritt Parkway ramp acceleration and deceleration lanes would also be provided. The westbound entrance ramp would be built between a recently constructed residential apartment building and the Merritt Parkway. As currently conceived, the new ramps would be at or below the level of the Merritt Parkway. The dual historic Merritt Parkway bridges over Main Avenue would be replaced and the roadway widened. A wider Main Avenue would enable left-turn movements and wider sidewalks. Three closely spaced signalized intersections would be provided along Main Avenue. Glover Avenue would be widened, and a replacement bridge provided over the Norwalk River. Creeping Hemlock Drive would be shifted to the north and widened.

Alternative 26

Alternative 26 proposes completing the partial interchange (Interchange 39, 40) with traffic movements between Route 7, the Merritt Parkway, and Main Avenue.

This concept introduces two signalized intersections along Route 7 to complete the partial interchange, and a reclassification of Route 7 from a freeway to a lesser, lower speed classification. A modified diamond interchange with the Merritt Parkway is proposed and retains the existing loop ramp in the northeast quadrant and the existing direct connector ramp in the southwest quadrant to optimize traffic operations at the two signalized intersections.

The loop ramp in the northeast quadrant would be reduced in size from the larger existing one, a change made possible by slower speeds on the reclassified Route 7 from a freeway to a signalized arterial. Three northbound and three southbound lanes would be necessary at the signalized Route 7/ramp intersections, with turn lanes at each Route 7 intersection approach. Unlike Alternative 21D, no powerline tower relocations are required for Alternative 26.

The location and configuration of the Merritt Parkway interchange with Main Avenue would enable connections between Main Avenue and Route 7 while efficiently accommodating traffic volumes there. Three closely spaced signalized intersections would be provided along Main Avenue. The four tight-loop ramps would be eliminated or improved. Elimination of the existing ramps in the southwest quadrant would allow for a long eastbound weaving lane between an eastbound Route 7 entry ramp and an improved exit loop in the southeast quadrant. Except for several specific variations, the conditions at Main Avenue proposed for

both Alternative 21D and Alternative 26 are largely similar.

In the westbound direction, the tight Merritt Parkway exit loop ramp in the northwest quadrant would be eliminated. To avoid further weaving on the westbound Merritt Parkway for the southbound Main Avenue movement, an independent ramp would be located between the westbound weaving lane and the new residential building to the north.

3.2 POTENTIAL VISUAL IMPACTS

3.2.1 Introduction

Once Project Alternatives have been set, an analysis that would identify any potential visual impacts that an alternative may have on any viewer group is necessary. It is assumed that the No-Build will generate no new visual impacts as it is the existing visual condition. An analysis of potential visual impacts for Alternatives 21D and 26 follows:

3.2.2 Potential Visual Impacts of Individual Project Alternatives on Viewer Groups

The potential for a visual impact by the project on a particular viewer group is dependent upon the alternative's location compared to the existing visual condition and the new elements being proposed, the materials and construction type proposed, and any site improvement elements included with the final project. Of particular concern for potential impact is the proximity of any new roadway facilities to any viewer group with a high sensitivity to visual changes from the existing condition (Residents, Pedestrians and Motorists) and any new element introduced that has a direct correlation to an historic resource's contributing characteristic(s).

3.2.3 Potential Impacts of Project on Viewpoints from within the Landscape Units

For each Build Alternative, sixteen viewpoints have been identified (Figure 3.2 through Figure 3.1) as important points-of-view from where potential changes to the existing visual conditions should be evaluated. These viewpoints represent the most critical views for the various viewer groups. The potential impacts of the project upon viewers from within the three Landscape Units and the sixteen selected viewpoints are anticipated to vary with sensitivity to the view and the extent that the view would be modified. Included in this section are illustrations which depict the effects of the project on each viewpoint. These renderings, combined with the technical documentation in the Environmental Assessment, provide the basis for determining the potential visual impact on each viewpoint.

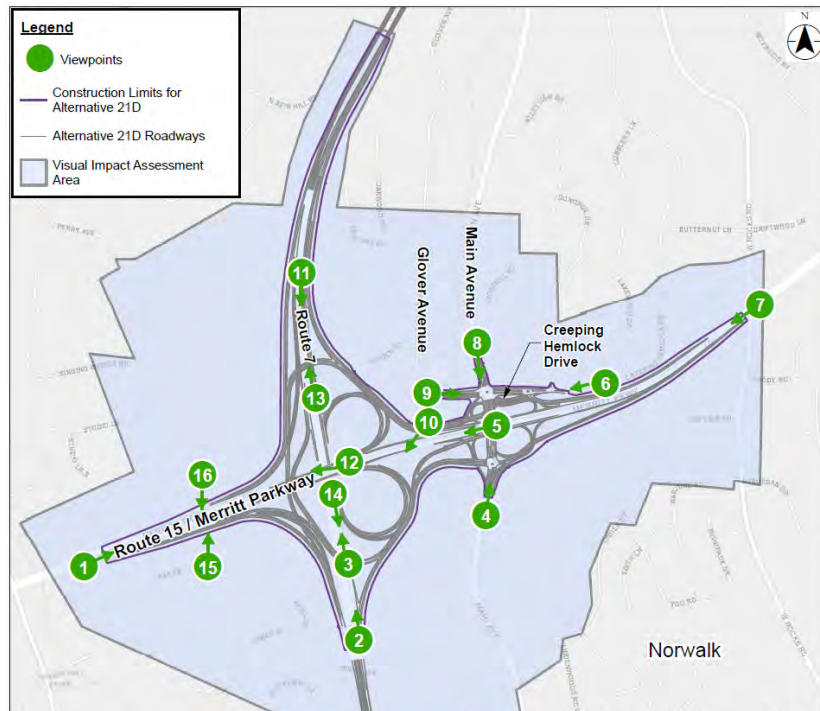


Figure 3.2 Visual Impact Assessment Viewpoint Locations - Alternative 21D

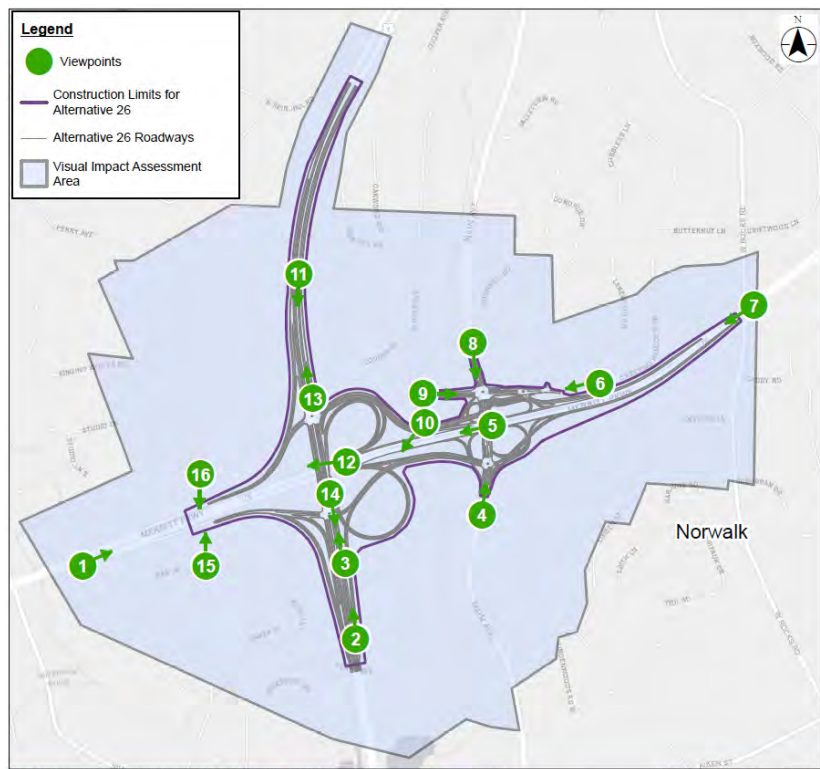


Figure 3.1 Visual Impact Assessment Viewpoint Locations – Alternative 26

Potential Impacts By Viewpoint

The following section first describes the potential view for each of the build alternatives from each viewpoint location. It will then describe any potential visual impact caused by that alternative at that location for each of the view groups previously described above.

Viewpoint #1 – View Looking Northbound on the Merritt Parkway

Alternative 21D

Viewers at Viewpoint #1 will see a widened, two-lane northbound exit ramp that takes motorists to either Route 7 southbound or a new intersection at Main Avenue. The widened ramp will require removal of vegetation along the roadside and will require more pavement than what currently exists. The bridge for the new ramp over Perry Avenue will be wider than the existing bridge so the view of the bridge's parapet will be altered from what's there today.

Alternative 26

Viewers at Viewpoint #1 will see a single-lane exit ramp similar to what in there now that takes motorists to a new intersection of an at-grade Route 7 urban arterial roadway. The ramp will use the same pavement as what currently exists. The bridge for the ramp over Perry Avenue will be not be changed.

Impacts By Viewer Groups

- Motorists on the Merritt Parkway and Route 7 – For travelers on the Merritt Parkway mainline, the visual environment changes caused by the additional pavement for the widened bridge over Perry Avenue for the northbound exit ramp of Alternative 21D will be noticeable when compared to the original visual character of the Parkway. This can be construed as a negative visual impact. In contrast, under Alternative 26 the existing number of lanes and bridges will remain unchanged. As a consequence, this Alternative will not result in visual impacts to this viewer group at this viewpoint.
- Motorists on Local Streets – Motorists on local streets will not have a view from this viewpoint on the Merritt Parkway.
- Residents and Pedestrians – With Alternative 21D, several residential properties on Rae Lane will have a new northbound exit ramp off the Merritt Parkway one lane closer to their property lines. This proposed new exit ramp location however would not impinge on or substantially decrease the existing vegetative buffer that currently exists between the residences and the Merritt Parkway. There would be no change in views with Alternative 26.

- Commercial and Office Workers and Customers – This viewer group will not have a view of the Parkway in this location.



Figure 3.3 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Existing View



Figure 3.4 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.5 Viewpoint #1 – View Looking Northbound on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #2 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #2 will see the additional pavement of a widened exit ramp to Main Avenue on the northbound side of Route 7 accomplished by the cutting back of the existing rock outcrop west of Route 7, and a realigned entrance ramp from the Merritt Parkway to Route 7 southbound. Figuring most prominently in this viewpoint is the new fly-over bridge over Route 7 where there currently is no bridge that connects Route 7 southbound to the Merritt Parkway northbound.

Alternative 26

Viewers at Viewpoint #2 will have views of an at-grade four lane urban arterial roadway in place of the freeway section that currently exists at that location today, and will see the additional pavement of a widened exit ramp to Main Avenue on the northbound side of Route 7. Both the existing southbound entrance ramp from the northbound Merritt Parkway to the southbound

Route 7 and the exit ramp from the northbound Route 7 to the northbound Merritt Parkway have been removed and the area where there was pavement has been landscaped.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – For Alternative 21D, motorists on northbound Route 7 will have a dramatically different view compared with current conditions. The existing rock outcrops will be cut even further back, with more ramp pavement and the new bridge in their view space. Therefore, the visual character of Route 7 will have an increased “interstate highway”-like appearance than what is currently seen. Given that the visual character of Route 7 is currently one of an interstate highway, the proposed changes would not be considered substantially different from existing conditions and therefore it would not result in a negative visual impact.

For completely different reasons, Alternative 26 will afford northbound Route 7 motorists a dramatically different view from what’s existing as well. In place of the current interstate highway-look that’s there today, this Alternative would result in a more modest transportation facility in the form of an at-grade urban arterial roadway. With no change to the rock outcrops at this location and landscaping will be seen. With this alternative, the proposed changes could be considered a positive visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of Route 7 in this location.



Figure 3.6 Viewpoint #2 – View Looking North on Route 7 – Existing View



Figure 3.7 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 21D



Figure 3.8 Viewpoint #2 – View Looking North on Route 7 - Proposed View for Alternative 26

Viewpoint #3 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #3 under this Alternative will be under a new fly-over bridge over Route 7 that connects Route 7 southbound to the Merritt Parkway northbound. A substantial amount of the existing rock outcrop on the western side of Route 7 will be removed to install the new ramp. The existing loop entrance ramp from the northbound Merritt Parkway to northbound Route 7 will be on a slightly new alignment nearly in the same location as is currently

Alternative 26

Viewers at Viewpoint #3 under Alternative 26 will be looking at a new, fully signalized, at-grade intersection on the new Route 7 four-lane urban arterial roadway. A new exit ramp from northbound Merritt Parkway and an entrance ramp to the eastbound Merritt Parkway replace the two freeway-style ramps that make these same connections. A substantial amount of the existing rock outcrop on the western side of Route 7 will be removed to install the new ramp. There will also be a new entrance ramp from northbound Route 7 to the northbound Merritt Parkway. The areas where ramps removed will be landscaped.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 - For Alternative 21D, motorists on northbound Route 7 will have a new bridge in their view space but otherwise, the views and visual character of Route 7 from this point-of-view could not be considered a negative visual impact as the existing visual character of Route 7 is one of an "interstate highway"-like appearance remains essentially unchanged.

Alternative 26 will afford northbound Route 7 motorists a markedly different view from the existing view, but for very different reasons than those described above. In place of the current interstate highway-look that's there today, a much more modestly scaled transportation facility of an at-grade urban arterial roadway would be constructed. To implement this alternative however, substantial alterations to the existing rock crops would be necessary which would then have an overall negative visual impact to the area.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of Route 7 in this location.



Figure 3.9 Viewpoint #3 – View Looking North on Route 7 – Existing View



Figure 3.10 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 21D



Figure 3.11 Viewpoint #3 – View Looking North on Route 7 - Proposed View for Alternative 26

Viewpoint #4 – View Looking North on Main Avenue

Alternative 21D

Viewers at Viewpoint #4 will see at a new, fully signalized, at-grade intersection on Main Avenue that accommodates connections from northbound Route 7 to Main Avenue and the Main Avenue entrance onto northbound Merritt Parkway. The areas where ramps were removed will be landscaped. The biggest visual change from the existing condition is that Main Avenue will be widened in this area to five lanes plus north and southbound bike paths and a sidewalk on each side. To do this, the Merritt Parkway mainline bridge over Main Avenue will be replaced with a new structure. The existing Main Avenue bridge is a single arch, rigid frame structure with a masonry veneer of rounded stones in a random pattern and granite voussoir stones that outline the arch's intrados opening. The Main Avenue bridge is a contributing resource element to the Merritt Parkway's listing on the NRHP.

Alternative 26

Viewers at Viewpoint #4 will have a similar change to the visual environment as Alternative 21D. Viewers here will see a new fully signalized, at-grade intersection on Main Avenue that will accommodate the connections from northbound Route 7 to Main Avenue and the entrance from Main Avenue onto northbound Merritt Parkway. The areas where ramps were removed will be landscaped. The biggest visual change from the existing condition is that Main Avenue will be widened in this area to five lanes plus north and southbound bike paths and a sidewalk on each side. To do this, the Merritt Parkway mainline bridge over Main Avenue will be

replaced with a new structure. The existing Main Avenue bridge is a single arch, rigid frame structure with a masonry veneer of rounded stones in a random pattern and granite voussoir stones that outline the arch's intrados opening. The Main Avenue bridge is a contributing resource element to the Merritt Parkway's listing on the NRHP.

Impacts By Viewer Group

- **Motorists on the Merritt Parkway and Route 7** – For both alternatives, motorists on the Merritt Parkway would have only a fleeting and tangential view of a widened Main Avenue resulting in no significant visual impact. Main Avenue is not visible from Route 7.
- **Motorists on Local Streets** – The proposed changes to both Main Avenue and the Merritt Parkway bridge over Main Avenue for both Alternative 21D and Alternative 26 will be visually dramatic. Main Avenue will be widened with an increased number of travel lanes along with new traffic signals, bike paths and sidewalks that will alter the character of how the street appears and how it functions when compared to today. This will be perceived as a negative visual impact.

For both alternatives, the removal and replacement of the Merritt Parkway bridge over Main Avenue will be a significant negative visual impact as the existing structure is a contributing resource to the Merritt Parkway NRHP historic district. While the existing condition is somewhat cluttered visually, the current landscape is significantly diminished in visual quality with an existing CTDOT staging area flanking the southeast edge of the Main Avenue bridge. Both alternatives will improve this condition.

- **Residents and Pedestrians** – The visual impact of both alternatives as described for motorists (above) would be the same but more pronounced for this viewer group as pedestrians in this area would have a view of the changed visual environment for a longer duration and their sensitivity is greater. The addition of sidewalks and bike lanes will be an overall improvement to the visual and physical character of this area. There are no residents at this point-of-view.
- **Commercial and Office Workers and Customers** – Similar to the visual impacts described for pedestrians (above), Commercial and Office Workers and Customers will experience comparable visual changes but with a lower sensitivity as their primary foci would be elsewhere. When these viewers do observe their exterior visual environment, the changes to landscape would be readily seen and could be construed as a minor positive impact to the existing view.



Figure 3.12 Viewpoint #4 – View Looking North on Main Avenue – Existing View



Figure 3.13 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 21D



Figure 3.14 Viewpoint #4 – View Looking North on Main Avenue - Proposed View for Alternative 26

Viewpoint #5 – View Looking South on the Merritt Parkway

Alternative 21D

Viewers at Viewpoint #5 will see a much wider Merritt Parkway section as it crosses Main Avenue than the four-lane roadway currently there. In addition to the two through lanes in each direction, adding to the width of the Parkway here will be a new on-ramp connection to the northbound Merritt Parkway from Route 7 northbound and the deceleration lane needed for a new ramp that connects southbound Merritt Parkway motorists to either northbound or southbound Route 7. The view of the bridge's parapet will be altered from what's there today. The width of the center median remains unchanged.

Alternative 26

Viewers at Viewpoint #5 will see a wider Parkway section here than existing, but it won't be as wide as proposed for Alternative 21D. While there will be a new deceleration lane necessary for a new ramp that connects southbound Merritt Parkway motorists to an at-grade arterial Route 7, there will be no new on-ramp connection to the northbound Merritt Parkway from Route 7 northbound. The view of the bridge's parapet will be altered from what's there today. As with 21D, the width of the center median remains unchanged.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – The additional pavement necessary for a widened Merritt Parkway mainline and the new bridge over Main Avenue will be a

negative visual impact for motorists on the Merritt Parkway. Any change to the median transforms the original parkway character negatively to more like a modern-day interstate. For both alternatives, the new bridge over Main Avenue may not have parapets like the original bridge thus denigrating the Parkway's historic visual quality.

Alternative 26 would involve construction of shorter ramps than those associated with Alternative 21D, and therefore would result in smaller visual impacts at this location. This area cannot be seen from Route 7.

- Motorists on Local Streets – Motorists on the adjacent local streets will have a sense of a larger Merritt Parkway but the views can only be from a distance and not significantly impactful.
- Residents and Pedestrians - This viewer group has no view of the Merritt Parkway in this location.
- Commercial and Office Workers and Customers – This viewer group can only view the Parkway from a distance and their view of the roadway is peripheral and somewhat limited. When these viewers do observe their exterior visual environment, the changes to landscape could be construed as a minor positive impact to the existing view.



Figure 3.15 Viewpoint #5 – View Looking South on the Merritt Parkway – Existing View



Figure 3.16 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.17 Viewpoint #5 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #6 – View Looking West on Creeping Hemlock Drive

Alternative 21D

Viewers at Viewpoint #6 will see a new alignment of Creeping Hemlock Road that will be straightened and widened from its current 2 lane configuration; one eastbound and one westbound, to a five-lane section with four lanes westbound and one lane eastbound. The new alignment cuts significantly into the rock outcrop on the north side of the street. The newly aligned Creeping Hemlock Road meets at a new, signalized T- intersection with Main Avenue and Glover Avenue. The exit ramp of the southbound Merritt Parkway to Creeping Hemlock Road will be realigned so that it is longer and located closer to Creeping Hemlock Road. Areas that were formerly ramp pavement will be landscaped.

Alternative 26

Viewers at Viewpoint #6 will see the same realignment of Creeping Hemlock Road that is included in Alternative 21D that is straightened and widened from its current 2 lane configuration; one eastbound and one westbound, to a five-lane section with four lanes westbound and one lane eastbound. The new alignment cuts significantly into the rock outcrop on the north side of the street. The newly aligned road meets at a new, signalized T- intersection with Main Avenue and Glover Avenue. The exit ramp of the southbound Merritt Parkway to Creeping Hemlock Road is realigned and will be longer and closer to Creeping Hemlock Road as well. Areas that were formerly ramp pavement will be landscaped along with opportunities for enhancing the buffers between the Parkway and the neighborhood.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – As this point-of view is off the Merritt Parkway's mainline on the periphery and can only be seen momentarily by motorists on the Merritt Parkway, the visual impact is not significant. This point-of-view is not available from Route 7.
- Motorists on Local Streets – The changes to the visual environment from either alternative would be dramatic and substantial. Where the existing road is a local, one-lane-in-each-direction and slightly curved street with the Parkway partially visible off to one side, the new road proposed in both alternatives would be five lanes wide, arrow-straight with significant rock removal required. The existing vegetated buffer between Creeping Hemlock Road and the Parkway would be eliminated thus exposing the neighborhood to unfiltered views of the mainline. These changes would be a negative impact to the visual feel of the neighborhood closest to the Parkway. The reestablishment of the existing buffer is possible.

- Residents and Pedestrians – The changes to the visual environment described for the local motorist (above) would only be intensified for this viewer group due to the longer exposure, closer proximity and heightened sensitivity.
- Commercial and Office Workers and Customers – There are no Commercial and Office Workers and Customers in this area.



Figure 3.18 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Existing View



Figure 3.19 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 21D



Figure 3.20 Viewpoint #6 – View Looking West on Creeping Hemlock Drive – Proposed View for Alternative 26

***Viewpoint #7 – View Looking South on the Merritt Parkway
Alternative 21D***

Viewers at Viewpoint #7 will see minor changes to the current visual character of the Merritt Parkway. Modifications to the righthand shoulder in advance of the realigned and lengthened exit ramp to Creeping Hollow Road and the merging of the northbound on-ramp from Main Avenue will cause the landscape buffers along outer limits of the Parkway to be pushed back along with some additional pavement for the ramps that will be required. The center median however will remain in its current configuration, and the Parkway's visual character will appear mostly but not totally unchanged.

Alternative 26

Viewers at Viewpoint #7 will see the same minor change to the current visual character of the Parkway as is seen with Alternative 21D. The same slight modifications described above will result in the Parkway's character generally remaining unchanged.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – This is the only viewer group with a view from this location. In comparison to the existing condition, the proposed alternatives will not result in views that are inconsistent with other safety improvements already being implemented along the length of the Parkway. As a consequence, impacts on views from this location would not be considered a negative.
- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of the Parkway in this location.

- Commercial and Office Workers and Customers - This viewer group has no view of the Parkway in this location.



Figure 3.21 Viewpoint #7 – View Looking South on the Merritt Parkway – Existing View



Figure 3.22 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 21D



Figure 3.23 Viewpoint #7 – View Looking South on the Merritt Parkway – Proposed View for Alternative 26

Viewpoint #8 – View Looking South on Main Avenue

Alternative 21D

Viewers at Viewpoint #8 will see a similar five-lane roadway section for Main Avenue as what's there currently. The concrete sidewalk on the west side of the street north of Glover Avenue will be carried all the way south to the intersection with Glover Avenue and Creeping Hemlock Road. Farther beyond the intersection, viewers will begin to see in the distance the new wider bridge that carries the Merritt Parkway over Main Avenue.

Alternative 26

Viewers at Viewpoint #8 will have the same view from this viewpoint as what comprises Alternative 21D. It will be a similar five-lane roadway section for Main Avenue as what's there currently. The concrete sidewalk on the west side of the street north of Glover Avenue will be carried all the way south to the intersection with Glover Avenue and Creeping Hemlock Road. Farther beyond the intersection, viewers will begin to see in the distance the new wider bridge that carries the Merritt Parkway over Main Avenue.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – The change to the existing visual environment for this viewer group will be de minimis. as the view is fleeting and peripheral. This view is not available to travelers on Route 7.
- Motorists on Local Streets – While the intersection of Main Avenue, Glover Avenue and Creeping Hemlock Road will be new, the road and its confines will remain largely the same. New elements such as signals and light poles will add a more urban character to the area, but the overall visual impact will not be significant. There is an opportunity to place the existing overhead utility wires underground so as to improve the existing visual character of the area.
- Residents and Pedestrians – Pedestrians and cyclists in this area will experience an improved visual and physical environment with new sidewalks. Their visual impact could be considered be positive.
- Commercial and Office Workers and Customers – Views of the new intersection would only be available to patrons of the gas station and the donation center on the corners. The overall visual impact will be minor. Views from the higher floors of the surrounding office buildings would be considered an overall minor improvement.



Figure 3.24 Viewpoint #8 – View Looking South on Main Avenue – Existing View



Figure 3.25 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 21D



Figure 3.26 Viewpoint #8 – View Looking South on Main Avenue – Proposed View for Alternative 26

Viewpoint #9 – View Looking East on Glover Avenue

Alternative 21D

Viewers at Viewpoint #9 will see a new Glover Avenue bridge over the Norwalk River as Glover Avenue will be realigned towards the new Glover/Main/Creeping Hemlock intersection and will be widened from its current one lane in each direction to three lanes eastbound and one lane westbound. The new alignment will bring Glover Avenue closer to the One Glover Avenue Apartments building on the south side of the road. A new four-lane bridge will replace the existing twin arch masonry structure with a small sidewalk and pipe railing on each side built in 1912. The existing bridge is listed on the NRHP.

Alternative 26

Viewers at Viewpoint #9 will have the same new view along Glover Avenue as proposed in Alternative 21D. There will be a new Glover Avenue bridge over the Norwalk River as the road will be realigned towards the new Glover/Main/Creeping Hemlock intersection and will be widened from its current one lane in each direction to three lanes eastbound and one lane westbound. The new alignment will bring Glover Avenue closer to the One Glover Avenue Apartments building on the south side of the road. A new four-lane bridge will replace the existing twin arch masonry structure with a small sidewalk and pipe railing on each side built in 1912. The existing bridge is listed on the National Register of Historic Places.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Viewers on both of these roads will not be able to see the proposed changes to Glover Avenue in the area.
- Motorists on Local Streets – Where there was once a simple, two-lane, historic masonry arch structure over the Norwalk River, both alternatives propose a new and significantly wider structure. The visual impact of the replacement bridge on a new alignment will be quite noticeable and considered negative.
- Residents and Pedestrians – Located closer to the One Glover Avenue Apartments residential building on Glover Avenue, the new bridge proposed for both alternatives that replaces an historic structure will be a negative visual impact to this viewer group.
- Commercial and Office Workers and Customers – In this location, office workers in the Merritt On The River office building on Glover Avenue have the same visual environment as do residents, only with reduced sensitivity given the property use. Impacts from both proposed build alternatives would be the same for this group.



Figure 3.27 Viewpoint #9 – View Looking East on Glover Avenue – Existing View



Figure 3.28 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 21D



Figure 3.29 Viewpoint #9 – View Looking East on Glover Avenue – Proposed View for Alternative 26

Viewpoint #10 – View Looking South From Glover Avenue

Alternative 21D

At the bend of Glover Avenue by the tracks of the Danbury Branch of Metro-North Railroad, viewers at Viewpoint #10 looking south will see a new bridge that carries Ramps ‘D’ and ‘WS’ over the railroad. This new bridge will be in the same location as the existing historic concrete twin barrel-arch that forms the Merritt Parkway mainline structure, and which will stay in place carrying the parkway over the railroad continuing to obscure the view of the existing mainline structure from this vantage point.

Alternative 26

Viewers at Viewpoint #10 will experience the same view as for Alternative 21D, including the new bridge that carries Ramps ‘D’ and ‘WS’ over the railroad.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 would have a limited views of this area, and only if substantial vegetation removal occurs.
- Motorists on Local Streets – As seen off to the side as one crosses the Metro-North tracks, the existing view of the historic Merritt Parkway mainline bridge over the Metro-North tracks will be completely blocked with the new ramp structure proposed in either

of the alternatives. This change to the visual environment is considered a negative impact.

- Residents and Pedestrians – The residents of units in the One Glover Avenue Apartments building that face the Merritt Parkway and pedestrians along Glover Avenue will be negatively impacted by the presence of the new ramp structure proposed in either of the alternatives.
- Commercial and Office Workers and Customers – Workers in the Merritt On The River office building on Glover Avenue will not be visually impacted by either alternative's new ramp in front of the existing Merritt Parkway bridge.



Figure 3.30 Viewpoint #10 – View Looking South From Glover Avenue – Existing View



Figure 3.31 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 21D



Figure 3.32 Viewpoint #10 – View Looking South From Glover Avenue – Proposed View for Alternative 26

Viewpoint #11 – View Looking South on Route 7

Alternative 21D

Viewers at Viewpoint #11 will still have a view of a freeway-style roadway with two southbound and two northbound lanes plus shoulders. The new elements associated with this alternative include a lengthened exit Ramp 'SW' from southbound Route 7 to southbound Merritt Parkway, a new entrance Ramp 'WN' to northbound Route 7 from southbound Merritt Parkway and a new flyover bridge Ramp 'WS' between the viewer and the existing Merritt Parkway mainline that carries southbound Merritt Parkway traffic to southbound Route 7. The lengthened southbound exit ramp and the new northbound entrance ramp will require large areas of vegetation and rock to be removed. Areas that were once ramp pavement will be landscaped.

Alternative 26

Viewers at Viewpoint #11 will be looking at the at-grade signalized intersection of a five-lane (three southbound, two northbound) principle arterial roadway in place of the existing freeway-style roadway. The four-legged intersection handles movements to and from north and southbound Route, Ramp 'WS' from Main Avenue and the southbound Merritt Parkway and Ramp 'F' which is an on-ramp to the southbound Merritt Parkway.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – For Alternative 21D, viewers on Route 7 will experience a new highway configuration that has the same interstate highway feel as the existing. Extensive swaths of the existing landscape buffer on both sides will be removed and this will result in a negative visual impact. Overall, however, the visual environment will remain one of an interstate highway. Viewers on the Merritt Parkway will experience a momentary side view of Route 7 from the southbound Merritt Parkway mainline and their visual experience will remain essentially unchanged.

With Alternative 26, the change to the existing visual environment will be substantial as it will afford southbound Route 7 motorists a dramatically different view from what's existing. In place of the current interstate highway-look that's there today, a much more modestly scaled transportation facility of an at-grade urban arterial roadway would be constructed. There will be no reduction to the landscape buffers on either side of the corridor. The change to the visual environment with Alternative 26 can be considered a positive impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers – This viewer group has a marginal view of Route 7 and any change to their visual environment is considered negligible.



Figure 3.33 View Looking South on Route 7 – Existing View



Figure 3.34 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 21D



Figure 3.35 Viewpoint #11 – View Looking South on Route 7 – Proposed View for Alternative 26

Viewpoint #12 – View Looking South on the Merritt Parkway

Alternative 21D.

Viewers at Viewpoint #12 will experience several changes to the existing visual environment of the Merritt Parkway mainline. While the Merritt Parkway's alignment will remain basically the same, the cuts to the rock outcroppings on the north side of the Parkway needed to build Ramp 'SE' and Ramp 'WS' from southbound Route 7 will be substantial. The additional amount of pavement and the new parapets of the new and wider bridges that carry the mainline of the Merritt Parkway over these two new ramps will also be visible to Parkway users.

Alternative 26

Viewers at Viewpoint #12 will not see the same changes that motorists would in Alternative 21D. The Merritt Parkway mainline bridges over Route 7 will remain the same and because the ramps from Route 7 southbound to the Merritt Parkway westbound use the same basic alignment as what exists today, the rock removal needed for Alternative 21D will not be necessary for this alternative.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With the new and wider bridges over Main Avenue, the visual character of the Merritt Parkway in this location will be

diminished with Alternative 21D's proposed configuration. It will have less of a park-like feel and the impact to the visual character would be negative.

- Only slightly less wide than the new bridges over Main Avenue needed for Alternative 21D, the impact to the visual environment caused by the new bridges over Main Avenue in Alternative 26 are similar in that they will create a diminished parkway visual experience.
- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of the Merritt Parkway in this location.
- Commercial and Office Workers and Customers – This viewer group has no view of the Merritt Parkway in this location.



Figure 3.36 Viewpoint #12 – View Looking South on the Merritt Parkway – Existing View



Figure 3.37 Viewpoint #12 – View Looking South on the Merritt Parkway –



Figure 3.38 Viewpoint #12 – View Looking South on the Merritt Parkway –

Viewpoint #13 – View Looking North on Route 7

Alternative 21D

Viewers at Viewpoint #13 will still have a view of a freeway-style roadway on Route 7 with two southbound and two northbound lanes plus shoulders and a northbound C-D road for the exit to the southbound Merritt Parkway. The new elements associated with this alternative include a lengthened exit Ramp 'SW' from southbound Route 7 to southbound Merritt Parkway and, most prominently, a new flyover bridge Ramp 'WS' that carries southbound Merritt Parkway traffic to southbound Route 7. A substantial amount of rock outcrop will be removed to construct new Ramp 'SE' that connects the southbound Route 7 to northbound Merritt Parkway.

Alternative 26

Viewers at Viewpoint #13 will be looking at the at-grade signalized intersection of a five-lane (three southbound, two northbound) principle arterial roadway in place of the existing freeway-style roadway. The four-legged intersection handle movements to and from north and southbound Route, Ramp 'WS' from Main Avenue and the westbound Merritt Parkway and Ramp 'F' which is an on-ramp to the westbound Merritt Parkway.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With Alternative 21D, the construction of the new flyover ramp 'WS' will add more highway elements to the overall interstate highway-look of Route 7, neither improving nor diminishing the highway's overall visual character. Since there is no visual resource that the new structure would visually obstruct, there is no visual impact though the view from the Merritt Parkway of a highway with a flyover ramp would further reduce the park-like context that users of the original Merritt enjoyed. The substantial amount of rock outcrop removal would cause a negative visual impact.

Alternative 26 will afford northbound Route 7 motorists a dramatically different view from what's existing. In place of the current interstate highway-look that's there today, the much more modestly scaled transportation facility of an at-grade urban arterial roadway with no change to the rock outcrops and landscaping will be seen. With this alternative, the proposed changes could be considered a positive visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers - This viewer group has no view of Route 7 in this location.



Figure 3.39 Viewpoint #13 – View Looking North on Route 7 – Existing View



Figure 3.40 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 21D



Figure 3.41 Viewpoint #13 – View Looking North on Route 7 – Proposed View for Alternative 26

Viewpoint #14 – View Looking South on Route 7

Alternative 21D

Viewers at Viewpoint #14 will still have a view of a freeway-style roadway with two southbound and two northbound lanes plus shoulders and a northbound C-D road and entrance ramp from the eastbound Merritt Parkway to northbound Route 7. Also, in this view is the new flyover bridge carrying the connecting ramp “SE” from southbound Route 7 to the eastbound Merritt Parkway and the eastbound Merritt Parkway to Main Street. The existing large rock outcrops on the west side of Route 7 will remain in place.

Alternative 26

Viewers at Viewpoint #14 will be looking at an at-grade signalized intersection of a seven-lane (four southbound, three northbound) principle arterial roadway in place of the existing freeway-style roadway. A new four-legged intersection will handle movements to and from north and southbound Route 7, Ramp ‘A’ from the eastbound Merritt Parkway and Ramp ‘H’ which is an on-ramp to the eastbound Merritt Parkway. To construct this intersection at-grade, large amounts of the rock outcrop on the west side of Route 7 will be removed.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – With Alternative 21D, the addition of a new flyover highway ramp only adds to the general interstate highway aesthetic already present on Route 7 and would further reduce the park-like context that users of the original Merritt enjoyed. Therefore, this alternative would result in impacts to the visual experience for viewers on either Route 7 or the Merritt Parkway.

With Alternative 26, the change from an interstate aesthetic to an at-grade urban arterial roadway would be considered a positive impact. However, because the amount of rock removal is large and it can be seen from both Route 7 and the Merritt Parkway, this must be considered a negative visual impact.

- Motorists on Local Streets - Motorists on local streets have no view from this viewpoint.
- Residents and Pedestrians - This viewer group has no view of Route 7 in this location.
- Commercial and Office Workers and Customers - This viewer group has a marginal view of Route 7 and any change to their visual environment must be considered negligible.



Figure 3.42 Viewpoint #14 – View Looking South on Route 7 – Existing View



Figure 3.43 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 21D



Figure 3.44 Viewpoint #14 – View Looking South on Route 7 - Proposed View for Alternative 26

Viewpoint #15 – View Looking North on Perry Avenue

Alternative 21D

Viewers at Viewpoint #15 will see a new bridge structure over Perry Avenue that will carry a widened exit ramp off the northbound Merritt Parkway, replacing an existing ramp structure in essentially the same location. Both the existing ramp and the new ramp are located directly in front of the original Merritt Parkway Perry Avenue overpass and they already have had a significant visual impact on the historic resource's integrity of setting.

Alternative 26

Viewers at Viewpoint #15 will not experience a change in visual character as the existing ramp structure over Perry Avenue will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Avenue overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 will have no view of either of the proposed alternatives from this point-of-view.
- Motorists on Local Streets – For either of the Alternatives, the circa 1990 concrete steel-girder bridge in front of the historic Merritt Parkway bridge over Perry Avenue

(on both sides of Merritt Parkway main line; see View #16) has already had a significant visual impact on the historic bridge's integrity of setting. Alternative 21D's new ramp structure would not directly impact the bridge or further affect the historic bridge's already compromised setting.

- Residents and Pedestrians – The visual impact for this viewer group will be the same as that described for Motorists on Local Streets (above).
- Commercial and Office Workers and Customers - This viewer group has no view of the Merritt Parkway ramp bridge over Perry Avenue.



Figure 3.45 Viewpoint #15 – View Looking North on Perry Avenue – Existing View



Figure 3.46 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 21D



Figure 3.47 Viewpoint #15 – View Looking North on Perry Avenue - Proposed View for Alternative 26

Viewpoint #16 – View Looking South on Perry Avenue

Alternative 21D

Viewers at Viewpoint #16 will not experience a change in visual character as the existing ramp structure over Perry Street will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Avenue overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Alternative 26

Viewers at Viewpoint #16 will not experience a change in visual character as the existing ramp structure over Perry Street will remain in its present location in this alternative. The existing ramp is located directly in front of the original Merritt Parkway Perry Street overpass and it already has had a significant visual impact on the historic resource's integrity of setting.

Impacts By Viewer Group

- Motorists on the Merritt Parkway and Route 7 – Motorists on both the Merritt Parkway and Route 7 will have no view of either of the proposed alternatives from this point-of-view.
- Motorists on Local Streets – For either alternative, there is no change in the visual environment and no visual impact.

- Residents and Pedestrians – For either alternative, there is no change in the visual environment and no visual impact.
- Commercial and Office Workers and Customers - This viewer group has no view of the Merritt Parkway ramp bridge over Perry Avenue.



Figure 3.48 Viewpoint #16 – View Looking South on Perry Avenue – Existing View



Figure 3.49 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 21D



Figure 3.50 Viewpoint #16 – View Looking South on Perry Avenue - Proposed View for Alternative 26

Summary of Alternatives and Visual Impacts

Two build alternatives, 21D and 26, plus a no-build alternative were analyzed for their visual impact to the VIAA. The no-build alternative maintains the existing visual context and is included for baseline comparative purposes only.

Both build alternatives widen Main Avenue to provide turning lanes and improved bicycle and pedestrian facilities on Main Avenue and therefore, both build alternatives include the full replacement of both Merritt Parkway mainline structures over Main Avenue. Both build alternatives also include the replacement of the Glover Avenue bridge over the Norwalk River along with the realignment of Creeping Hemlock Drive thus necessitating substantial rock cut back.

Alternative 21D can be considered the more “built out” of the two alternatives as it includes a new fly-over bridge over Route 7 that requires substantial rock cuts that Alternative 26 does not have along with all new connecting ramps to facilitate all the required movements between the Merritt Parkway, Route 7 and Main Avenue in a traditional highway interchange configuration. Alternatively, Alternative 26 takes a less typical “highway design improvement” approach to making these connections with the conversion of Route 7 from a typical high-speed interstate highway configuration with standard acceleration and deceleration loop ramps to an at-grade urban arterial with intersections and traffic signals.

In the most general terms, Alternative 21D imparts more overall noticeable visual impact on the VIAA than Alternative 26 as it includes more constructed features that add to the overall “highway” feel of the VIAA. While both build alternatives impart various visual impacts in certain areas, some in common with each other, Alternative 26 has fewer ramps and bridges than Alternative 21D so the cumulative visual impact to the VIAA can be considered lower than that of Alternative 21D.

4.0 MITIGATION MEASURES

Section 3.0 identified and described the level of potential visual impacts that may be caused by either of the two proposed project build alternatives. It is the purpose of this section to identify and recommend potential mitigation measures for identified negative visual impacts as identified in Section 3.0.

As prescribed in the FHWA’s Guidelines for Visual Impact Assessments, mitigation measures will be required in instances where negative impacts have been identified for various viewsheds and viewer groups. Mitigation measures will be necessary to address impacts that are determined to occur once one has analyzed a potential proposed view with the finishes and treatments developed as part of and included in the proposed future build condition are included in the evaluation.

As prescribed in the FHWA's *Guidelines for Visual Impact Assessments*, mitigation measures will be required in instances where negative impacts have been identified for various viewsheds and viewer groups. Mitigation measures will be necessary to address impacts that are still determined to occur once one has analyzed a potential proposed view with the finishes and treatments developed as part of and included in the proposed future build condition are included in the evaluation. Finishes and treatments that could be included as a component of the proposed design might include replacement bridges and structures consistent with the overall architectural style of the Merritt Parkway. Additional mitigation measures above what the proposed design will include as a component of the proposed design would be identified through discussions with the interested parties and project stakeholders and confirmed by the State.

Route 7/15 PAC Updated:
Merritt Parkway Landscape
Guidelines
4/23/2020



Melissa Pineda
Senior Planner
mpineda@fhistudio.com | 917-933-7441
fhistudio.com

Fitzgerald & Halliday, Inc. (FHI) is now FHI Studio!
To learn more, view our announcement [video](#).

From: Melissa Pineda
Sent: Thursday, April 23, 2020 2:33 PM
To: Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>
Subject: Route 7/15 PAC Update



Route 7-15 Norwalk

Dear PAC Members,

We hope you are doing well and staying healthy. The 7/15 Norwalk Project Team has continued our work on developing the environmental documentation for the project.

We have also been continuing to work on the Merritt Parkway Landscape Assessment Guidelines ('Guidelines'). The Guidelines have not changed from our earlier discussion with the PAC Landscape Subcommittee and overall PAC. The attached memorandum provides a summary of the process and expanded definitions of guideline categories.

In the coming months, we will be finalizing the Draft Environmental Assessment/Environmental Impact Evaluation (EA/EIE). We will look to schedule a PAC meeting before the public distribution of the EA/EIE, likely this fall.

Thank you for your continued involvement with the project.

Stay well.

The 7/15 Norwalk Project Team

Melissa Pineda / Senior Planner
mpineda@fhiplan.com / (917) 933-7441

FHI | Fitzgerald & Halliday, Inc.
Innovative Planning, Better Communities
11 Hanover Square, 3rd Floor | New York, NY 10005
CT • NY • NJ | www.fhiplan.com

To: 7-15 Norwalk Project Advisory
Committee Section 106/Landscape
Subcommittee

From: John F. Eberle, PE
Stantec Consulting Services Inc.

55 Church Street
New Haven, CT 06510

File: 192310508

Date: April 21, 2020

Reference: Merritt Parkway Landscape Assessment Guidelines

As a follow-up to the Project Advisory Committee (PAC) Section 106/Landscape Subcommittee meeting of November 21, 2019, Stantec provided an update to the draft Merritt Parkway Landscape Assessment Guidelines ('Guidelines') to attendees taking into consideration comments recorded at the meeting. The purpose of the Guidelines is to provide some direction for assessing alternatives as part of the Environmental Assessment (EA) document, and to inform the development of the design of the preferred alternative subsequent to the conclusion of the Environmental Documentation process. The purpose of this memorandum is to summarize the background and key assumptions for development of the Guidelines as well as provide expanded definitions of guideline categories.

I. INTRODUCTION

The Connecticut Department of Transportation (CTDOT) is proposing a series of changes to the intersection of Route 7, Route 15 (the Merritt Parkway), and Main Avenue in Norwalk, Connecticut. Interchange No. 39 currently provides partial connections between Route 7 and the Merritt Parkway including:

- Route 7 northbound to the Merritt Parkway southbound
- Route 7 southbound to the Merritt Parkway southbound
- Merritt Parkway northbound to Route 7 northbound
- Merritt Parkway northbound to Route 7 southbound.

Connections between Route 7 and the Merritt Parkway to and from the north are not provided. The project is intended to remedy this situation by providing full connections between Route 7, the Merritt Parkway, and Main Avenue.

The Merritt Parkway, completed in the early 1940s and extending 37 miles from the Connecticut/New York state line to the Housatonic River in Stratford, has been designated both a Connecticut Scenic Road and a National Scenic Byway. The Parkway is also listed in the National Register of Historic Places as a significant example of an important type of designed landscape (early 20th-century scenic parkways inspired by the City Beautiful Movement).

Because of the Parkway's historic significance, it is imperative that the project be undertaken in a way that is sympathetic to its essential character. Currently, the project is in the planning phase, evaluating alternatives that will meet the project's Purpose and Need. Once a preferred alternative is selected, the design will be further developed to a greater level of detail.

The purpose of the Guidelines is to inform the development of the final design so that the project's improvements can be integrated into the Parkway's historic character and landscape aesthetic.

II. PROCESS

The Guidelines build upon understandings of the Parkway's essential character as articulated in previous documents, including

- "Merritt Parkway Historic District," National Register of Historic Places documentation, prepared by Catherine Lynn and Christopher Wigren (1991).
- *A Landscape Plan for the Merritt Parkway* (1994).
- *Merritt Parkway Guidelines for General Maintenance and Transportation Improvements* (1994).
- *Merritt Parkway Conservation and Restoration Plan: Bridge Restoration Guide* (2002).
- .
- Published studies, including *The Merritt Parkway* by Bruce Radde (1991) and *The Merritt Parkway: The Road that Shaped a Region* by Laurie Heiss and Jill Smyth (2014).

The Guidelines were initially prepared by Stantec, CTDOT's engineering and landscape architecture consultant, and then reviewed, revised, and approved by CTDOT. Public involvement included a landscape workshop held in Norwalk in September 2018 and presentation of the draft Guidelines to the Project Advisory Committee Section 106/Landscape Subcommittee in November 2019. Follow-up included incorporation of stakeholder comments recorded at the meeting and redistribution of the edited Guidelines. The stakeholders who participated included representatives of the Merritt Parkway Conservancy, Preservation Connecticut (formerly the Connecticut Trust for Historic Preservation), the City of Norwalk, neighborhood groups, and local business owners.

III. KEY ASSUMPTIONS FOR IMPLEMENTING THE GUIDELINES IN THE FINAL DESIGN

- The project's Purpose and Need cannot be met without some changes to the Parkway as it currently exists; additional ramps and entrance/exit lanes will be necessary.
- Application of the Guidelines to the existing Parkway within the project limits revealed a mix of positive and negative attributes. Positive attributes include some areas with appropriate plantings, some effective buffers, and a few distinctive rock outcroppings. Negative attributes include invasive species, depleted plantings, encroachment of modern development, lack of buffers in key areas, poor access for maintenance, and inconsistent guiderail and signage standards and aesthetics.
- Implementation of the Guidelines in the design process can both preserve and enhance existing positive attributes and improve existing negative attributes, thereby integrating the project's improvements into the Parkway's historic character and landscape aesthetic.

IV. THE GUIDELINES

The Merritt Parkway Landscape Assessment Guidelines that will be implemented in the course of finalizing the design of the preferred alternative are as presented in tabular form on the next page.

Category	Guidelines
Views within, from, and to Parkway (all user groups)	Parkway road sides exhibit varied spatial organization with focal points and park-like experiences
	Views of ramp roadside landscapes exhibit park-like characteristics
	Bridge structures are featured, yet integrated into planting design, vegetation, and topography
	Distant landscape views beyond the right-of-way are provided (distinctive architecture, scenic vistas)
Vegetation and planting design	Widths of road sides are adequate for planting and creating and/or maintaining naturalized landscape character
	Vegetation and planting frame views, complement bridge structures, and screen unsightly views
	Non-invasive plant species and palette are complementary of the Parkway setting
	Seasonal characteristics and clusters of native and specimen plant species provide contrast and visual interest between ground plane, understory, and canopy
	Existing and advantageous vegetation is preserved to provide aesthetic, buffer and park-like value
Topography	Built road-sides transition into naturalized landscape
	Slight to moderate slopes on roadsides are conducive to planting and landscape maintenance access
Aesthetic Rehabilitation	Remnant, scarred, and cluttered right-of-way areas are rehabilitated to enhance Parkway character
	Engineered components (e.g. stormwater measures) do not detract from Parkway landscape features
Circulation	Roadway footprint does not diminish existing Parkway landscape character
	Fences and barriers do not visually impose upon park-like and naturalized features
Amenities	Design vocabulary is consistent and recognizable as the Parkway
Sustainability	Planting areas provide suitable space and soil volume to allow plant species to achieve potential growth and habit
	Park-like landscape provides ease of access to road sides for sustained maintenance
Natural features	Landscape design and vegetation reveal natural and scenic resources such as watercourses, landform, and rocky ledge
Safety	Vegetation, planted areas, and amenities do not obstruct critical sight lines
	Planting design and vegetated areas conform to CTDOT safety guidelines

Guidelines are grouped according to the following categories:

Views within, from, and to the Parkway

All user groups (motorists, passengers, cyclists, pedestrians, building occupants, other) within, approaching, and leaving the project area should experience the park-like setting of the Merritt Parkway. This experience may be enhanced through landscape design including varied spatial organization created by plantings and vegetation; focal points that highlight natural and cultural features within the landscape; and view corridors that accentuate distant architectural and natural features. In instances where buildings are very close to the Parkway ROW with minimal landscape buffer, landscape enhancement options within the immediate building surrounds within the Parkway ROW may be limited.

Vegetation and planting design

The width of roadside established in the preferred alternative must be adequate for planting. Existing vegetation with aesthetic and functional qualities should be preserved to create and/or maintain naturalized landscape character within the Merritt Parkway right-of-way. Framing views, enhancing bridge structures, screening unsightly views, and buffering between roadway lengths with native and non-invasive species are desired characteristics. Roadsides provide opportunity to enhance seasonal interest of the Parkway surrounds with clusters of native and specimen plant species that provide contrast between ground plane, understory, and canopy.

Topography

Topography and roadway alignment are key features in creating a park-like setting and unique travel experience. To the extent that new ramp lengths are needed, their respective roadsides should transition smoothly into the naturalized landscape. Slight to moderate slopes on roadsides are conducive to preserving desirable stands of existing vegetation and establishing new plantings that accentuate views and that are easily accessible for sustained landscape maintenance.

Amenities

Design vocabulary will be consistent and recognizable as the Parkway. As the CTDOT progresses with phased safety improvements along the entire length of the Parkway, amenities such as guiderail, parapet walls, signage, drainage appurtenances, and roadway edge treatments are being installed consistently, with a common aesthetic. To the extent possible, these same amenities will be incorporated into the design of new and rehabilitated access and egress ramps for the two proposed interchanges in the project area.

Aesthetic Rehabilitation

The project area has experienced decades of intervention, including the construction of Route 7 over 25 years ago, and the start and termination of construction of the Main Avenue interchange in 2006. This project, through landscape design integrated with roadway engineering, will aim to rehabilitate remnant, scarred and cluttered right-of-way areas to enhance the Parkway's character within the project area. Integrated landscape architecture and engineering design for stormwater measures and other critical functions should not detract from existing Parkway features. They should be visual attributes.

Circulation

Through integrated engineering and landscape architecture design, the roadway footprint of the preferred alternative will minimize visual impact on existing Parkway character. Opportunities to enhance roadsides and preserve existing natural features, in conjunction with new ramp alignments, are priorities. Fences and barriers that may be required will not impose upon or detract from the Parkway's existing and/or re-established park-like character.

Sustainability

More today than at any other point in the Parkway's history, sustainability in design and maintenance is paramount. Planting areas should provide suitable spaces and soil volume to allow for adequate plant growth and visual impact. Creating a park-like landscape with ease of access for sustained maintenance, optimum safety conditions for field staff, and minimal traffic disruption during maintenance operations are an important part of these design guidelines.

Natural features

Landscape reveals natural resources (e.g., watercourses, woodlands, rocky ledge). In recognizing the rich landscape history of the Parkway, preserving and exposing/uncovering natural features is essential. New plantings and landform may provide enhancement by accentuating view corridors toward natural features and displacing invasive vegetation.

Safety

Safety goes hand in hand with all landscape guidelines. Landscape architecture and engineering design prioritize safety, mobility and user experience. As such, vegetation, planted areas, and amenities will be located so as not obstruct critical sight lines. Planting design and vegetated areas will conform to CTDOT safety guidelines while aiming for enhancement of the Parkway's park-like character as a foundation of the preferred alternative's design.

Stantec Consulting Services Inc.

John F. Eberle, PE
Principal

Phone: 203 495 1645
Fax: 203 495 1652
john.eberle@stantec.com

Attachment:

c.

FHWA invited to review/comment on
Phase I/II Cultural Resources Report
February 11, 2020

McMillan, Mark J.

From: McMillan, Mark J.
Sent: Tuesday, February 11, 2020 11:10 AM
To: Emilie Holland - FHWA (emilie.holland@dot.gov)
Cc: Eberle, John (John.Eberle@stantec.com); Antoniak, Yolanda M; Fesenmeyer, Andy A.; Lesay, Kimberly C
Subject: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Tracking:	Recipient	Delivery
	Emilie Holland - FHWA (emilie.holland@dot.gov)	
	Eberle, John (John.Eberle@stantec.com)	
	Antoniak, Yolanda M	Delivered: 2/11/2020 11:10 AM
	Fesenmeyer, Andy A.	Delivered: 2/11/2020 11:10 AM
	Lesay, Kimberly C	Delivered: 2/11/2020 11:10 AM

Ms. Holland,

Below is a link to the revised Phase I/II Cultural Resources Report for State Project #102-358 in Norwalk. The file '2020-2-5 FINAL 7_15 Public Phase I_II_.docx' has been reviewed by the cultural resources staff and project consultant. We are forwarding it to FHWA for your office's review. Please let us know if you have any comments. Given the schedule of this project, we would like to receive this input within 30 days (by March 11, 2020). Please note that the link will expire at the end of this week, but the file may be downloaded and reviewed locally. If you encounter any problems with this link or the document, please let me know.

Login Information

FTP link: <https://tmpsftp.stantec.com>

Login name: s0131082553

Password: 6371732

Disk Quota: 2GB

NEW Expiry Date: 2/14/2020

Thank you,

Mark

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131



(860) 594-2135
(860) 594-3028 - Fax
mark.mcmillan@ct.gov

Correspondence with CT SHPO
and Consulting Parties
re: Public Report
February-March 2020

From: Labadia, Catherine <no-reply@sharepointonline.com>
Sent: Tuesday, March 17, 2020 2:07 PM
To: McMillan, Mark J.
Cc: Labadia, Catherine
Subject: Labadia, Catherine shared "2020-2-5 FINAL 7_15 Public Phase I_II_" with you.

Let me know if it works.
Cathy



This link only works for the direct recipients of this message.



2020-2-5 FINAL 7_15 Public Phase I_II_

Open



Sender will be notified when you open this link for the first time.

Microsoft respects your privacy. To learn more, please read our [Privacy Statement](#).
Microsoft Corporation, One Microsoft Way, Redmond, WA 98052

From: Labadia, Catherine
Sent: Tuesday, February 11, 2020 11:05 AM
To: McMillan, Mark J.
Subject: RE: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Got it.
Thanks,
Cathy

From: McMillan, Mark J. <Mark.McMillan@ct.gov>
Sent: Tuesday, February 11, 2020 11:00 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Norwalk 7/15 Interchange Phase I/II Cultural Resources Report

Ms. Labadia,

Below is a link to the revised Phase I/II Cultural Resources Report for State Project #102-358 in Norwalk. The file '2020-2-5 FINAL 7_15 Public Phase I_II_.docx' has been reviewed by the cultural resources staff and project consultant. We are forwarding it to SHPO for your office's review. Please let us know if you have any comments. Given the schedule of this project, we would like to receive this input within 30 days (by March 11, 2020). Please note that the link will expire at the end of this week, but the file may be downloaded and reviewed locally. If you encounter any problems with this link or the document, please let me know.

Login Information

FTP link: <https://tmpsftp.stantec.com>

Login name: s0131082553

Password: 6371732

Disk Quota: 2GB

NEW Expiry Date: 2/14/2020

Thank you,

Mark

Mark McMillan

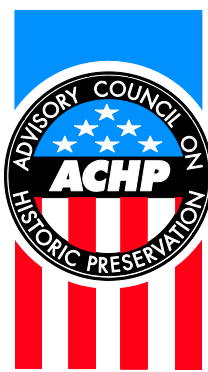
Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
☎ (860) 594-2135

☎ (860) 594-3028 - Fax
✉ mark.mcmillan@ct.gov



ACHP Effects Report Review Letter

June 4, 2019



Preserving America's Heritage

June 4, 2019

Kurt A. Salmoiraghi
Program Development Team Leader
Federal Highway Administration
Connecticut Division
628-2 Hebron Avenue Suite 303
Glastonbury, CT 06033

Ref: Proposed Route 7/Route 15 Interchange Project
Norwalk, Connecticut
ACHP Connect Case #014039

Dear Mr. Salmoiraghi:

On April 16, 2019, the Connecticut Department of Transportation (CT DOT), on behalf of the Federal Highway Administration (FHWA), provided the Advisory Council on Historic Preservation (ACHP) with its *Draft Phase I and II Cultural Resource Survey Route 7/Route 15 Interchange Project State Project No. 102-358* (Effects Report) for the referenced undertaking. The Effects Report is submitted as part of the FHWA's compliance with the Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). Pursuant to the Programmatic Agreement among the Federal Highway Administration, the Connecticut Department of Transportation, the Advisory Council on Historic Preservation, the Connecticut State Historic Preservation Officer Regarding Implementation of Minor Transportation Projects executed on May 4th, 2018, CT DOT may complete certain activities related to FHWA's Section 106 consultation including the inventory research and documentation related to the identification and evaluation of historic properties and assessment of effects. However, FHWA remains responsible for the final findings and determinations in the Section 106 review. As the ACHP is planning to participate in this consultation, we are providing our comments regarding FHWA's preliminary assessment of effects. Our comments are also informed by the May 7th, 2019, consultation meeting regarding this Effects Report.

The Effects Report provides a good overview of the four build alternatives currently under consideration, and appropriately describes the historic properties within or near the Area of Potential Effect (APE)/ Visual Impact Assessment Area (VIAA). In the Effects Report for each alternative, CT DOT analyzed the potential effects to multiple historic properties including the nationally significant Merritt Parkway Historic District. However, the ACHP is concerned that not enough detail is provided to properly characterize the nature and intensity of the adverse effects in a way that will enable informed consideration of alternatives. Additionally, the ACHP has identified a number of issues that will need to be addressed in this Effects Report to help facilitate consideration of the potential effects of this undertaking. We clarify in the following.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street, Suite 308 • Washington, DC 20001-2637

Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov Appendix N6 Page 578

Potential effects to the Merritt Parkway Historic District.

The Effects Report provides a thorough and well-written historic context for the Winnipauk and Silvermine communities (both located in the APE/VIAA), and the Merritt Parkway Historic District. The ACHP understands that the Merritt Parkway Historic District's importance and significance have been recognized by the federal government, the state of Connecticut, and national, state and local preservation groups, with multiple designations and awards. The Merritt Parkway Historic District was listed in the NRHP in 1991 and is significant under Criteria A and C for its association with the pre-World War II City Beautiful Movement; a landscape design that integrates the built road infrastructure with the existing landscape using native vegetation as inspired by the work of Frederick Law Olmsted; and bridges designed by George Dunkelberger. However, the Effects Report does not clearly indicate which landscape-related contributing elements in the Merritt Highway Historic District retain integrity in the context of significant changes to the landscape over time. The ACHP recommends that FHWA include in the Effects Report a more detailed analysis of how the landscape characteristics could potentially be affected by each alternative. Such an analysis should include consideration of natural systems and features, spatial organization, land use, cluster arrangement, circulation, topography, vegetation, views and vistas, constructed water features, small-scale features, and other appropriate components of the district.

Area of Potential Effect and Visual Impact Assessment Area.

As noted in the Effects Report, several historic properties are located outside the APE/VIAA including the Silvermine Center Historic District, the Perry Avenue Bridge, and the Silvermine Avenue Historic District. The ACHP requests that FHWA explain why these historic properties are included in this assessment of effects if they are outside the APE/VIAA. If there are concerns regarding the potential for indirect or cumulative effects to these properties resulting from visual impacts or changes with traffic patterns, FHWA should determine whether the APE/VIAA should be expanded appropriately. Similarly, the ACHP requests that FHWA clarify if the Silvermine Avenue Historic District is considered eligible for the NRHP. If so, FHWA should delete the word "proposed" when describing this historic property and the potential effects to it.

Cumulative Effects

The ACHP requests FHWA include an analysis of cumulative effects, based on traffic studies, and explain if any changes in traffic patterns or increases in traffic could potentially affect the identified historic properties. Additionally, the ACHP requests FHWA notify the consulting parties when it will report on the potential for impacts from noise and vibration. The federal agency should clarify how it will consider these impacts in consultation with the consulting parties based on the information provided in the Effects Report. FHWA should also suggest what types of avoidance and minimization measures could be considered to address potential adverse effects due to noise and/or vibration impacts (page 4).

Integrity of eastern end of Merritt Parkway vs. areas surrounding the eastern portion of the APE/VIAA.

FHWA suggests that the areas surrounding the eastern portion of the APE have significantly changed, in particular near the Main Avenue interchange, due to residential development (page 27). However, it also has concluded that the eastern end of the Merritt Parkway Historic District retains higher integrity than the western end of the historic district (page 32). The ACHP requests that FHWA provide additional photographs and information related to the Merritt Parkway Historic District's integrity to help clarify these potentially contradictory statements.

Summary and Comparison of Current Build Alternatives with Previously Proposed 2008 Alternatives.

The ACHP supports the request made by the National Trust for Historic Preservation during the recent consultation meeting that FHWA and CTDOT compare the four build alternatives currently under consideration with the previous alternatives proposed in 2008. The ACHP understands a law suit and economic constraints thwarted the state's original plan to redesign this same interchange in 2008. The ACHP believes this broader analysis of alternatives will better inform consultation regarding the selection of a preferred alternative and measures to avoid and minimize potential effects to the Merritt Parkway Historic District.

We look forward to receiving a revised Effects Report. Our comments should be considered along with other relevant comments and edits submitted by other consulting parties who are participating in the Section 106 review. If you have questions or concerns, please contact Sarah Stokely at (202) 517-0224, or via e-mail at sstokely@achp.gov.

Sincerely,



Jaime Loichinger
Assistant Director
Federal Permitting, Licensing, and Assistance Section
Office of Federal Agency Programs

FHWA Letter to CTDOT Cultural Resources Unit
re: Conclusion of tribal consultation

May 27, 2019



U.S. Department
of Transportation
**Federal Highway
Administration**

STATE PROJECT NO. 102-358 - Route 7/Route 15 Interchange

DRAFT EA-EIE Appendix N6 - Section 106 Consultation

Connecticut Division

May 27, 2019

6282 Hebron Avenue
Suite 303
Glastonbury, CT 06033
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HDA-CT

Dear CTDOT Cultural Resources Unit:

The Federal Highway Administration (FHWA) has conducted and concluded tribal consultation for transportation undertakings, as requested by your office. On 26 April 2019, FHWA electronically delivered information about applicable undertakings to Federally-recognized Indian tribes who have an identified area of interest in the project area.

We did not receive any comments.

The following undertakings have undergone tribal consultation:

State Project Number	Description	Summary Comments Received from Tribe(s) ¹
0102-0358	<i>Route 7/15 Interchange Improvement Project (Norwalk, Fairfield County)</i>	No comments

With this letter, Tribal consultation is concluded for the undertakings identified herein. Please work with our office to resolve any substantive comments provided by Tribes. FHWA appreciates your continued cooperation in tracking Tribal consultation outcomes and your assistance in ensuring that commitments made to Tribes are met. If you have any questions, please contact me telephone at 860-494-7577 or by email at emilie.holland@dot.gov.

Sincerely,

M. Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

CTDOT Consultation initiation letter
to SHPO, resending on May 7, 2019

From: Speal, Charles S
Sent: Tuesday, May 7, 2019 3:15 PM
To: Labadia, Catherine
Cc: Scofield, Jenny; McMillan, Mark J.
Subject: FW: Initiation of Consultation -- CTDOT Proj No 102-358 in Norwalk
Attachments: [InititLetter toAgencies 17APR2017.pdf](#); [Report_revis Phasela Rte7_15 25JAN2017.pdf](#)

Hi Cathy,

Per our discussion today I just wanted to confirm that we did send the Phase Ia assessment report to your office back in 2017, see below and attached. Granted it was pretty rudimentary at that time, but at least I wasn't completely off-base in my recollections.

Scott

From: Speal, Charles S
Sent: Wednesday, May 03, 2017 9:29 AM
To: Labadia, Catherine <Catherine.Labadia@ct.gov>
Subject: Initiation of Consultation -- CTDOT Proj No 102-358 in Norwalk

Hello Cathy,

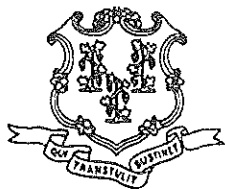
OEP would like to initiate consultation with your office under Section 106 of the NHPA, NEPA and CEPA with regard to Improvements to the Route 7 / Route 15 Interchange in the City of Norwalk. Please find attached an introduction letter including the draft Purpose and Need Statement, which should have already been transmitted to your office separately, and a Phase Ia cultural resource assessment survey of the proposed project area. Invitations to project status and progress meetings will be forthcoming in the near future.

Feel free to contact with any questions.

Best,

C. Scott Speal
National Register Specialist, Archaeology

Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546
April 13, 2017
Phone:

Ms. Susan Lee
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

Dear Ms. Lee,

RE: Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (Department) are initiating the Route 7/Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the city of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA)/Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA/CEPA.

Your agency has been identified as one that may have an interest in this project because of the resources located in the project area. Accordingly, the Department is sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. You are also encouraged to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held according to the requirements of CEPA. The scoping meeting notice will be published in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

If you have any questions or comments regarding the attached project information, the Department encourages you or your designee to either attend the future CEPA project scoping meeting or alternatively contact Andy Fesenmeyer, Department's Project Manager, at Andy.Fesenmeyer@ct.gov or (860) 594-3228.

Very truly yours,

Andy Fesenmeyer
Transportation Supervising Engineer
Bureau of Engineer and Construction

cc: Christopher Hansen, Federal Highway Administration

Jennifer Sweeney/js

bcc: Kevin Carifa

Mark Carlino

Scott Spiel

Richard Armstrong – Andy Fesenmeyer-Jennifer Sweeney

Thomas Doyle

BR

S:\Condes\SR\SWEENEY\102-358\ NEPA_CEPA Coordination Letters_PN_032717_Draft

The above letter was sent to the following:

Ms. Susan Lee

U.S. Army Corps of Engineers

New England District

696 Virginia Road

Concord, MA 01742

Ms. Kristina Newman-Scott

Director of Culture

Connecticut Department of Economic and
Community Development

One Constitution Plaza, Second Floor
Hartford, CT 06103

Mr. Tim Timmermann

Associate Director

U.S. EPA Region 1

John F. Kennedy Bldg.

Boston, MA 02203-0001

Mr. John Warner

Assistant Supervisor, Federal Activities

United States Fish & Wildlife Service New

England Field Office

70 Commercial Street Suite 300

Concord, New Hampshire 03301

Ms. Mary Beth Mello

FTA Region 1 Administrator

Kendall Square

55 Broadway, Suite 920

Cambridge, MA 02142-1093

Mr. Frederick Riese

Senior Environmental Analyst

Connecticut Department of Energy and
Environmental Protection

Office of Environmental Review

79 Elm Street

Hartford, CT 06106-5127

Ms. Lori Mathieu

Public Health Section Chief

CT Department of Public Health

Drinking Water Section

410 Capitol Avenue, MS#12DWS

P.O. Box 340308

Hartford, CT 06134-0308

The Honorable Harry W. Rilling

Mayor

City of Norwalk

125 East Avenue

P.O. Box 5125

Norwalk, CT 06856-5125

Mr. Francis Pickering

Executive Director

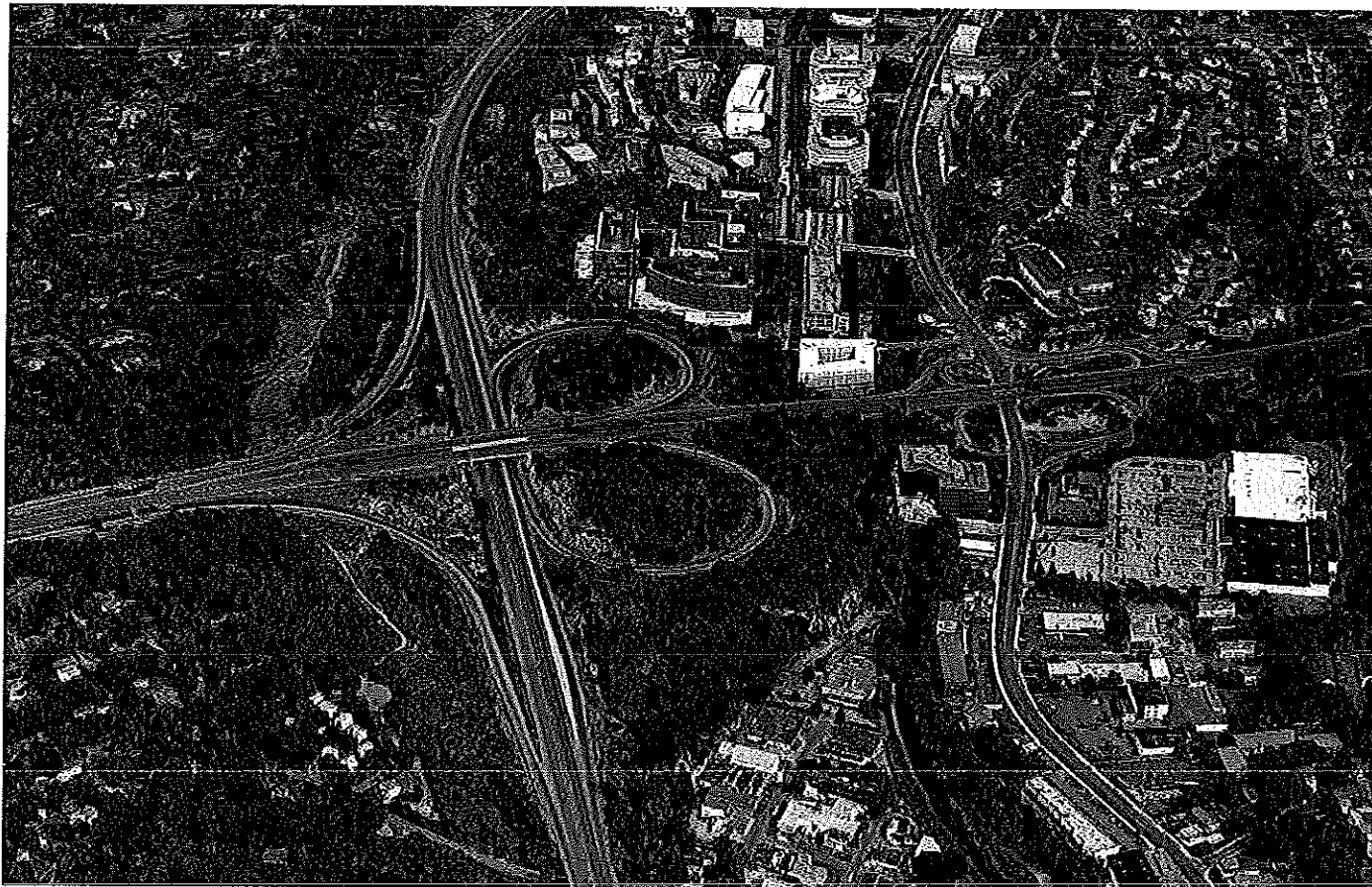
Western Connecticut Council of Governments

1 Riverside Drive

Sandy Hook, CT 06482

ROUTE 7/15 INTERCHANGE PROJECT
NORWALK, CONNECTICUT

DRAFT PURPOSE AND NEED STATEMENT



ROUTE 7/15 NORWALK PROJECT DRAFT PURPOSE AND NEED STATEMENT

PROJECT LOCATION

The proposed project is located in the northern portion of the City of Norwalk and encompasses the interchange of the Route 15 (Merritt Parkway) and Route 7; the interchange of the Merritt Parkway with Main Avenue; Main Avenue (SR 719); and Glover Avenue/Creeping Hemlock Drive in the vicinity of Main Avenue. The project area extends along the Merritt Parkway from approximately 0.5 miles west of Route 7 to approximately 0.5 miles east of Main Avenue and along Route 7 from approximately 0.5 miles south of the Merritt Parkway to approximately 0.5 miles north of the Merritt Parkway.

The project area is illustrated in Figure No. 1.

EXISTING TRANSPORTATION NETWORK

Route 7

Regionally, Route 7 serves as an important north-south transportation corridor in western Connecticut, connecting Interstate 84 (I-84) in Danbury and Interstate 95 (I-95) in Norwalk. Throughout the corridor, Route 7 provides essential service to residential communities and businesses in the towns of Ridgefield, Redding and Wilton as well as the cities of Danbury and Norwalk. Within and abutting the project area, Route 7 is a four lane limited access expressway between I-95 and Grist Mill Road in Norwalk, where it intersects with the Route 7 arterial roadway to the north. The roadway that previously functioned as Route 7 between I-95 and Grist Mill Road prior to the completion of the Route 7 expressway is now called Main Avenue.

Merritt Parkway

The Merritt Parkway is approximately 37 miles long. It connects the Hutchinson River Parkway at the New York State line in Greenwich to the Wilbur Cross Parkway at the Housatonic River in Stratford. The Parkway has two travel lanes in each direction and is restricted to non-commercial use. It was listed in the National Register of Historic Places for its significance in the areas of landscape design, transportation and architecture. It was also designated as a National Scenic Byway and State Scenic Road. Therefore, the overall character of the Merritt Parkway (its form, geometry and appearance) is an intrinsic element to its significance. In the project area, the Merritt Parkway carries traffic over Perry Avenue, Route 7 and Main Avenue as well as the Norwalk River and Metro North Railroad. This portion of the Parkway includes four historic bridges that are contributing resources to the Merritt Parkway National Register listing. They are the Perry Avenue Overpass (CTDOT Bridge No. 00719), the Main Avenue Bridge (Nos. 00530A and 00530B), the Metro North Railroad Overpass (No. 00720) and the Norwalk River Overpass (No. 00721).

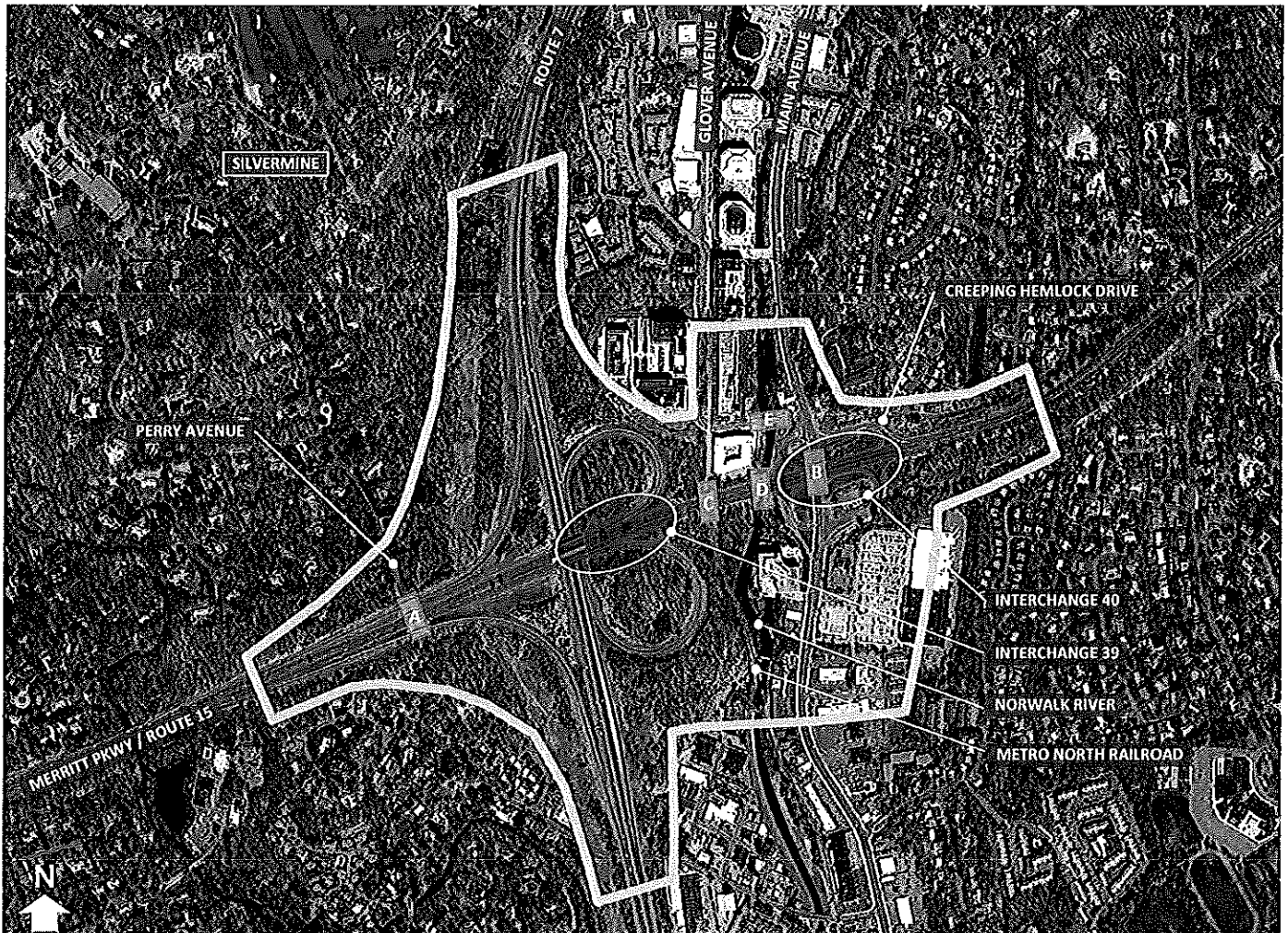







Figure No. 1: Project Area

Historic Bridges

-  Perry Avenue Overpass
-  Main Avenue Bridge
-  MNRR Overpass
-  Norwalk River Overpass
-  Glover Avenue over Norwalk River

Existing Interchanges

Interchange No. 39 provides partial connections between Route 7 and the Merritt Parkway. Connections are provided from Route 7 northbound to the Merritt Parkway southbound, from Route 7 southbound to the Merritt Parkway southbound, from the Merritt Parkway northbound to Route 7 northbound and from the Merritt Parkway northbound to Route 7 southbound. Connections between Route 7 and the Merritt Parkway to and from the north are not provided. Due to the missing connections, the Merritt Parkway southbound motorists must use the Merritt Parkway/Main Avenue interchange (Exit 40B) to access Route 7 northbound, north of Grist Mill Road. Merritt Parkway northbound motorists must use the Merritt Parkway /Main Avenue interchange (Exit 40A) to access Route 7 southbound south of Route 123/New Canaan Avenue. Similarly, motorists on Route 7 have no direct access to the Merritt Parkway northbound and must use Main Avenue to access the Parkway.

Interchange No. 40, a second nearby interchange provides connections in all directions between the Merritt Parkway and Main Avenue. This interchange is located approximately 1,500 feet east of the Route 7 and Merritt Parkway interchange and the Norwalk River.

Main Avenue

Main Avenue is a four lane urban minor arterial which parallels Route 7 and the Norwalk River and extends north and south of the Merritt Parkway/Route 7 interchange. Connections between Route 7 and Main Avenue do not exist in the vicinity of Interchange No. 39 or Interchange No. 40.

Glover Avenue

The Glover Avenue Bridge (No. 04155) which carries Glover Avenue over the Norwalk River is independently eligible for listing in the National Register of Historic Places. Glover Avenue, also connects with Creeping Hemlock Drive at the signalized intersection with Main Avenue. Creeping Hemlock Drive serves the residential community east of Main Avenue.

PROJECT PURPOSE

The purpose of the project is to improve system linkage between Route 7 and the Merritt Parkway at Interchange No. 39; improve the mobility for all users at the Merritt Parkway's Main Avenue and Route 7 Interchanges (No. 39 & No. 40); and improve safety in the vicinity of these interchanges.

PROJECT NEEDS

CTDOT and FHWA are undertaking the project to improve the efficiency and/or reduce the deficiencies of the existing Interchanges and streets in the vicinity of the interchanges.

System Linkage

The existing Merritt Parkway and Route 7 Interchange configuration does not provide all connections between Route 7 and the Merritt Parkway. As a result, approximately 250 and 125 vehicles use the Main Avenue corridor to connect between Route 7 and the Merritt Parkway during the weekday morning and weekday evening peak hours, respectively. This is approximately 5 to 15 percent of the traffic currently using the Main Avenue corridor between CT 123 and CT 15 during either peak hour. These additional vehicles contribute to peak hour

congestion along the Main Avenue corridor (LOS D/E). Providing the missing connections would allow access in all directions, eliminate the need for motorists to use Main Avenue to connect between Route 7 and the Merritt Parkway, and improve the efficiency of motorists connecting between the roadways.

Safety

The existing Main Avenue and Merritt Parkway Interchange ramps have inadequate acceleration and deceleration lanes, steep grades, sharp curves, and limited sight distance that contribute to a high number of crashes. Over a three-year period, (2012-2014) a total of 190 crashes have occurred along Main Avenue or on the Merritt Parkway in the vicinity of Interchange No. 40. Of those, 28 crashes have occurred on Main Avenue and 162 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange. Over a three-year period, (2012-2014) a total of 120 crashes have occurred along Route 7 or on the Merritt Parkway in the vicinity of Interchange No. 39. Of those, 29 crashes have occurred on Route 7 and 91 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange. The segment of the Merritt Parkway in the vicinity of the interchange with Main Avenue has been on CTDOT's Suggested List of Surveillance Study Sites (SLOSSS) for the past decade. Similarly, the segment of the Main Avenue corridor in the vicinity of the interchange with the Merritt Parkway (Glover Avenue) has been on CTDOT's SLOSSS list for the past five years. The SLOSSS list is an annual listing of exceptionally high accident locations.

Mobility

Providing vehicular connections between Main Avenue and Route 7 would improve mobility for some users of Main Avenue and Route 7. Up to approximately 250 peak hour vehicles accessing the roadways from locations north or south of the project area either originate from or are connecting between portions of Route 7 and Main Avenue in the vicinity of the Merritt Parkway interchanges. Providing for pedestrian and/or bicycle access would allow connections between neighborhoods and land uses for pedestrians and bicyclists that currently do not exist.

Congestion

Main Avenue and Glover Avenue in the vicinity of Interchange No. 40, are currently experiencing heavy congestion and delays during peak hours. The intersection of Main Avenue at Glover Avenue / Creeping Hemlock Drive operates at LOS F and LOS E during both the weekday morning and weekday evening peak hours. Furthermore, certain ramps at the Merritt Parkway interchange with Main Avenue operate at LOS E or F. Improvements at the interchange and/or Main Avenue would reduce congestion and reduce delays at those intersections with the existing traffic volumes. With long term traffic growth, it is possible that congestion could continue to occur but the impacts of that congestion would be less with the Interchange/ Main Avenue improvements than it would be if the improvements are not made.

PROJECT GOALS AND OBJECTIVES

Goals and objectives that provide other factors that would be considered in the alternative analyses screening process include:

- A. Long Term Serviceability of the Affected Roadways within the Project Area:
 - 1. Creating opportunities for improved connections to existing and reasonably foreseeable future modes of transportation within the project area. (i.e. surface transit, Metro-North Railroad, bicycles/pedestrians, etc.)
 - 2. Coordinating with the City of Norwalk toward a workable solution that is compatible with city and regional initiatives.
- B. Maximize the Public Investment with the Project:
 - 1. Utilizing cost-effective solutions that maximize capital investment over the lifespan of the project.
 - 2. Reducing short term maintenance costs of the affected bridges and roadways.
 - 3. Minimizing the impact of construction on the traveling public and local communities.
 - 4. Implementing sustainable practices.
- C. Integrate the Project Roadways with the Environment and Neighborhood context:
 - 1. Incorporating design elements that are not only consistent with the *'Merritt Parkway Guidelines for General Maintenance and Transportation Improvements'* for maintaining and improving the Parkway's resource characteristics within the confines of the Merritt Parkway Scenic Byway Corridor, but identify opportunities for design elements that are sensitive to the historic character of the Parkway corridor and integrity, and where feasible, elements of the original design intent
 - 2. Incorporating features and details that would improve the aesthetic qualities of the project roadways as viewed from adjacent areas and sustain a contiguous and recognizable character of the scenic Parkway.
- D. Provide for Reasonably Foreseeable Future Pedestrian and Bicycle Access Through the Project Area:
 - 1. Provide pedestrian and bicycle accommodations for the future extension of the pedestrian access and bike trails through the project area.

**MEMORANDUM REPORT
PRELIMINARY PHASE IA CULTURAL RESOURCE ASSESSMENT
ROUTE 7/ROUTE 15 INTERCHANGE
STATE PROJECT NO. 102-358
NORWALK, CONNECTICUT**

Prepared for

Stantec
55 Church Street, Suite 601
New Haven, CT 06510

By

Archaeological and Historical Services, Inc.
569 Middle Turnpike
P.O. Box 543
Storrs, CT 06268
860-429-2142
www.ahs-inc.biz

Authors:
David E. Leslie
Stacey Vairo

December 28, 2016
Updated January 25, 2017

TABLE OF CONTENTS

LIST OF FIGURES	ii
I. INTRODUCTION	1
A. Background, Scope and Study Area	1
B. National and State Registers of Historic Places Eligibility	2
C. Project Alternatives	3
II. ARCHAEOLOGICAL CONTEXT	5
A. Known Pre-colonial archaeological sites in or near the Route 7/15 APE	5
B. Environmental Assessment of Archaeological Sensitivity	8
III. ARCHAEOLOGICAL SENSITIVITY ASSESSMENT	10
IV. HISTORIC RESOURCES CONTEXT	19
V. ABOVE-GROUND HISTORIC RESOURCE ASSESSMENT	21
VI. REFERENCES	38

LIST OF FIGURES

- Figure 1. Map of APE of the Route 7/15 Interchange project (No. 102-358), shown with a natural color satellite imagery background.
- Figure 2. Map of hand-powered soil probe locations, used to delineate soil integrity and areas of archaeological sensitivity.
- Figure 3. Map of archaeologically sensitive areas identified during Phase Ia walkover survey, shown with a natural color satellite imagery background.
- Figure 4. Map of archaeologically sensitive areas, shown with a street map background.
- Figure 5. Picture of intact soil development from Area 2. A and B soil horizons are shown in this profile.
- Figure 6. Disturbed soil sequence, taken from the area north of the south-bound Route 7 interchange on-ramp to south-bound Route 15. A disturbed A soil horizon is displayed, as well as a C soil horizon.
- Figure 7. Map of historically sensitive areas, shown with a natural color satellite imagery background.
- Figure 8. Map of historically sensitive areas, shown with a street map background.
- Figure 9. The house at 114 Perry Avenue, the main house of the Verneur Pratt Historic District. View east.
- Figure 10. The house at 304 Silvermine Avenue, located within the Silvermine Center Historic District. View north.
- Figure 11. House at 177 Silvermine Avenue in the proposed Silvermine Avenue Historic District. View west.
- Figure 12. Merritt Parkway looking toward the Route 7/15 Interchange from the Perry Avenue Bridge. View east. (Google Street View, September 2016)
- Figure 13. Merritt Parkway looking toward Route 7/15 Interchange. View west. (Google Street View, September 2016)
- Figure 14. Perry Avenue Bridge (Bridge No. 719). View north.
- Figure 15. Metro North Railroad Bridge (Bridge No. 720). View south.
- Figure 16. Norwalk River Bridge (Bridge No. 721). View south.

- Figure 17. Main Avenue Bridge (Bridges 530A and 530B). View north.
- Figure 18. Main Avenue Bridge (Bridges 530A and 530B) prior to the recent repairs (CTDOT Bridge Inspection photo, 12/2014).
- Figure 19. Glover Avenue Bridge (Belden Hill Avenue Bridge, Bridge No. 4155). View northeast.

I. INTRODUCTION

This report provides a summary of the results of documentary research and field assessment survey to define areas of archaeological sensitivity and above-ground historical resources in the Area of Potential Effect (APE) for the two alternatives currently under consideration for improving traffic at the intersection of Routes 7 and 15 in Norwalk, Connecticut: Alternative 21C and Alternative 26 (Figure 1). The survey was conducted in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, Section 4(f) of the Department of Transportation Act of 1966, and the Connecticut Environmental Protection Act (CEPA).

The survey forms the basis for identification of Existing Conditions vis-à-vis archaeological and historical resources, for inclusion in the Environmental Assessment/Environmental Impact Evaluation (EA/EIE) documentation currently in preparation.

A. Background, Scope and Study Area

Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), requires that federally funded or permitted projects take into account the effects of their undertakings on historic and archaeological resources listed in or eligible for listing in the National Register of Historic Places (NR).

Section 4(f) of the Department of Transportation Act of 1966 (49 USC 303) states that the Secretary of USDOT may approve a transportation program or project requiring the use of land from a historic site of national, state or local significance (as determined by the federal, state or local officials having jurisdiction over the site) only if the following exists: 1) there is no feasible and prudent alternative to using that land, and the program or project includes all possible planning to minimize harm to the Section 4(f) property; or 2) the Section 4(f) use is *de minimis*.

CEPA states that actions undertaken by state agencies must be evaluated in regard to their impacts on historic, sacred, and archaeological sites of state or national importance. The State Register of Historic Places (SR) is Connecticut's list of historic properties deemed worthy of preservation by the Connecticut State Historic Preservation Office (CTSHPO).

Windshield surveys were conducted by AHS in September, October and November of 2016 to determine the presence of potential NR-eligible historic resources within the APE for Alternatives 21C and 26. File research was also conducted to determine the presence of resources previously listed in the NR in the APE and vicinity. General statewide and local published histories and inventories of historic resources were consulted, along with previously completed cultural resource studies of the APE vicinity in order to establish an overall historical context and to help identify historic resources in the APE. Historic maps, archives, illustrations, photographs, and NR forms for individual properties and districts were reviewed.

The archaeological assessment included research in the archaeological site files of the CTSHPO and Office of State Archaeology (OSA), cultural resource management reports, and environmental sources. The assessment also included a walkover inspection and small-diameter soil-probe sampling to identify archaeologically sensitive areas (i.e., areas with demonstrated potential for containing intact, potentially NR-eligible buried cultural resources).

Visual effects are not included as that assessment has not been completed, nor has the visual effect APE been refined.

All conclusions regarding potential impacts should be considered preliminary, as specific design and construction parameters for each alternative area are as yet unknown.

A comprehensive technical report, with expanded descriptions of archaeological sensitivity and historic resources within the APE, is forthcoming.

B. National Register of Historic Places and State Register of Historic Places Eligibility

Properties identified by the project historians and archaeologists as potentially eligible were evaluated by applying the NR criteria of significance, which state the following:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- B. That are associated with the lives of persons significant in our past; or*
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
- D. That have yielded or may be likely to yield, information important in history or prehistory.*

Resources may qualify under one or more of the NR eligibility criteria. In addition to meeting at least one of the criteria, NR-eligible resources must also possess “several” of the seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association).

The criteria for listing in the SR closely follow that of the NR. Connecticut’s SR includes districts; sites; buildings; structures and objects of national, state or local significance. These resources possess integrity of location, design, setting, materials, workmanship, feeling and association and:

- 1. are associated with events that have made a significant contribution to our history and the lives of persons significant in our past; or*
- 2. embody the distinctive characteristics of a type, period or method of construction; or that represent the work of a master; or that possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
- 3. have yielded, or may be likely to yield, information important in prehistory or history.*

The SR includes the following:

- All properties that were surveyed in the 1967-68 state inventory and subsequently adopted by the predecessor of the Historic Preservation Council in 1975.
- Properties that have been listed in the NR are automatically listed on the SR.
- Properties included in local historic district or historic property study reports that have received favorable recommendation by CTSHPD pursuant to CGS Section 7-147b are listed

on the SR.

- Properties that have been approved or deemed formally eligible for inclusion in the NR by the State Historic Preservation Review Board.

C. Project Alternatives

Alternative 21C is proposed as a full interchange, with traffic movements between Route 7, the Merritt Parkway (MP) and Main Avenue. The existing Route 7/MP loop ramps would be retained in the easterly quadrants and the direct connections in the westerly quadrants. The four remaining Route 7/MP interchange movements would be achieved with semi-direct connections involving nine new bridges. The number of and makeup of lanes would be maintained. Several towers of a power line may require relocation.

The MP interchange with Main Avenue would be improved, with the elimination of the four non-standard geometric loop ramps. The resulting modified diamond interchange ramps would require four new bridges (two over the Metro North Railroad and two over the Norwalk River) to enable all connections with Route 7 and the MP. Very long MP ramp acceleration and deceleration lanes would also be provided. The westbound entrance ramp would be built between a recently constructed residential apartment building and the MP.

The dual historic MP bridges over Main Avenue would be replaced and widened. A wider Main Avenue would enable left-turn movements and wider sidewalks. Three closely spaced signalized intersections would be provided along Main Avenue. Glover Avenue would be widened and a replacement bridge provided over the Norwalk River. Creeping Hemlock Drive would be shifted to the north and widened.

Alternative 26 is a boulevard concept with signalized intersections along Route 7. A modified diamond interchange with the MP is proposed, and includes a loop ramp in the northeast quadrant to avoid a heavy dual left-turn Route 7 northbound-to-westbound MP movement.

The loop ramp would be reduced in size from the larger existing one, made possible by slower speeds on the reclassified Route 7 from a freeway to a boulevard. Two signalized Route 7/ramp intersections would be provided, and three northbound and three southbound lanes would be necessary, with turn lanes at each Route 7 intersection approach. Unlike Alternative 21C, no bridges or power line tower relocations are required for Alternative 26.

The location and configuration of the MP interchange with Main Avenue would enable connections between Main Avenue and Route 7 while efficiently accommodating traffic volumes there. The four tight-loop ramps would be eliminated or improved. Elimination of the existing ramps in the southwest quadrant would allow for a long eastbound weaving lane between an eastbound Route 7 entry ramp and an improved exit loop in the southeast quadrant.

In the westbound direction, the tight MP exit loop ramp in the northwest quadrant would be eliminated. A westbound entry ramp from Creeping Hemlock Drive and northbound Main Avenue would avoid a heavy northbound left-turn movement on Main Avenue at the Parkway Bridge. To avoid further weaving on the westbound MP for the southbound Main Avenue movement, an independent ramp would be located between the westbound weaving lane and the new residential building to the north. Connection to the westbound MP and Route 7 would be made via a Route 7 signalized intersection.

The configuration for Glover Avenue and Creeping Hemlock Drive and the Main Avenue and Glover Avenue bridges are similar to Alternative 21C, but only two Main Avenue signalized

intersections would be required, rather than three. New ramp bridges would be needed over the Norwalk River and Metro North Railroad track.

II. ARCHAEOLOGICAL CONTEXT

The APE of Alternatives 21C and 26 is characterized primarily by industrial development, which includes roads, embankments, tracks, culverts, machine dug drainages, as well as industrial and residential urban settings.

A. Known Pre-colonial archaeological sites in or near the Route 7/15 APE

Forty-five pre-colonial sites in Norwalk have been formally reported to the SHPO and OSA. Nearly all of these are located within a short distance of the modern shoreline and represent large artifact scatters, shell middens, and burials, most of which have been destroyed by development. Unfortunately, most of the site forms contain little or no specific information regarding the age, setting, or content of the sites. Most are generally classified as Archaic/Woodland Period in age. Many were documented by avocational archaeologists in the 1960s and some are summarized in briefs published in the Newsletter of the Bridgeport Chapter of the Archaeological Society of Connecticut. Powell also published a number of site summaries in local and regional journals (Powell 1964, 1965a, 1965b, 1965c, 1967, 1970, 1971a, 1971b). Additional sites were documented by Fred Warner of Connecticut Archaeological Survey (CAS, Inc. 1974, 1985). In 1989 Professor Ernest Wiegand completed an archaeological reconnaissance survey of the Comstock Brook and Norwalk River watershed, documenting many of the archaeological sites in the project area as part of the Norwalk Community College excavations and survey (Wiegand 1989). AHS completed Phase I, II, and III investigations near and within the project area as part of a previous Route 7/15 improvement project for the CTDOT (Jones et al. 2005; Forrest and Clouette 2007; Harper 2007). Table 1 summarizes known sites within the immediate vicinity of the APE.

The site file data indicate that undisturbed portions of the APE, especially those near perennially active streams and rivers, represent areas of moderate to high archaeological sensitivity for pre-Colonial and Historic period peoples. However, undisturbed sediments represent a small proportion of the overall APE, or approximately 22%, based on National Resource Conservation Soils Service (NRCS) estimates for this area. Extensive land-making and soil displacement associated with the construction, modification, and demolition of Routes 7 and 15 has likely destroyed or deeply buried many of the pre-colonial and historic-period archaeological deposits within the APE.

Table 1: Locally Known Archaeological Sites

Site Number	Site Name	Cultural Period	Site Type	Reference
103-10	Bitter Rockshelter (Jostrand #13)	Archaic/ Woodland	Small rockshelter	OSA Site Files, Powell, B. W. 1965 BMAS 26(3&4): 53-63; ASCNL 83:5; 1971 Penn Arch Bull 41(1-2); Jostrand T. 1961, Newsletter Bridgeport Chap, Arch. Soc. of Conn. No. 7 (Dec.)
103-11	N/A	Historic	Unknown	OSA Site Files
103-37	West Rocks School	N/A	N/A	OSA Site Files

Site Number	Site Name	Cultural Period	Site Type	Reference
103-38	Jostrand #14	Pre-Colonial	N/A	OSA Site Files
103-39	Jostrand #12	Pre-Colonial	N/A	OSA Site Files
103-40	Jostrand #11	N/A	N/A	OSA Site Files
103-41	Jostrand #8	N/A	A small campsite & shell midden	OSA Site Files
103-49	N/A	Paleoindian, Late Archaic, Early and Late Woodland, 19 th Century	Short term encampments, 19 th century dwelling/store	Phase I, II, and III survey of previous Route 15 improvements (Forrest and Clouette 2007; Jones et al. 2005)
103-51	Norwalk Silvermine	18 th Century	Industrial - Mining	OSA Site Files
161-02	Perkin-Elmer Rockshelter	Middle Archaic, Late Archaic, Late Woodland	Rockshelter	OSA Files, Wiegand 1983
161-07	Wolfpit Rockshelter	Pre-Colonial	Rockshelter	OSA Files, Wiegand 1983
161-09	Perkin-Elmer Site	Pre-Colonial	N/A	OSA Files
161-10	Company Saw Mill	18 th -19 th century saw mill	Industrial-Saw mill	OSA Files
161-11	Comstock Brook #1	Terminal Archaic	Small campsite	OSA Files, Wiegand 1989
161-12	Comstock Brook #2	Late Archaic, Late Woodland, Contact	Campsite	OSA Files, Wiegand 1989
161-13	Comstock Brook #3	Woodland Period	Upland Camp	OSA Files, Wiegand 1989
161-14	Comstock Brook #4	Late Archaic	Seasonal Camp	OSA Files, Wiegand 1989
161-15	Comstock Brook #5	Late Archaic	Small Campsite	OSA Files, Wiegand 1989
161-16	Comstock Brook #6	N/A	Small Campsite	OSA Files, Wiegand 1989
161-17	N/A	N/A	N/A	OSA Files
161-22	N/A	18 th – 19 th century	House	Phase I and II survey of previous Route 15 improvements (Forrest and Clouette 2007)
161-23	N/A	18 th century	House	Phase I, II, and III survey of previous Route 15 improvements (Forrest and Clouette 2007; Harper 2007)
161-24	N/A	Pre-Colonial, 18 th – 19 th century	Unknown, House	Phase I and II survey of previous Route 15 improvements (Forrest and Clouette 2007)

Three of these sites were located and tested by avocational archaeologist Ted Jostrand in the 1950s or early 1960s. Site 103-10, the Bitter Rockshelter, was the object of more attention

and was discussed in a number of publications including local archaeological bulletins and newsletters in the 1960s (Powell 1965b, 1971b). A 1976 Central Connecticut State University/Connecticut Archaeological Survey (CAS) site form describes the material recovered from this site as numerous projectile points, pottery, various animal bones, axe celts, knife, a pendant, scrapers, a polishing stone, kaolin pipe fragments, etc.; shell, hearths, and human bones in midden trash. Further documentation submitted by Professor Fred Warner of CAS to the OSA in April of 1979 suggested that the site was destroyed. Wiegand conducted additional excavations at the rockshelter in 1980 and determined that intact sections of the site had been preserved and summarized the finds in a 1983 monograph. Wiegand indicated the presence of Vosburg, Sylvan stemmed and side-notched, Orient fishtail, and Levanna points, in addition to 600 pottery sherds (Wiegand 1983). These artifacts indicate the rockshelter retained evidence of several temporally distinct occupations and the projectile point data suggested that much of the site assemblage was associated with the Late Archaic and Late Woodland periods. Important faunal data was recovered as well, documenting the use of marine resources including oyster, quahog, soft shell clam and mussel, as well as ray and fish. Terrestrial animal remains included possible turkey and bald eagle, wolf, possible bobcat, raccoon, deer and historic-period domestic animal remains.

The Perkin-Elmer Rockshelter (161-02) and Wolf Pit Rockshelter (161-07) lie within 0.25 miles of the APE, in the town of Wilton. Both are described in detail by Wiegand (1983). Perkin-Elmer was largely destroyed during construction of a parking lot, but excavations at the remaining sections of the site suggested short-term use during the Middle Archaic, Late Archaic, and Late Woodland periods and possibly the Late Paleoindian and Early Woodland periods. The recovery of three Neville projectile points is notable, as reported Middle Archaic sites are far less common in western Connecticut than eastern Connecticut. Lithic materials recovered from the Perkins-Elmer rockshelter included quartz, green-gray chert, black chert, quartzite and slate/shale. Faunal materials included small quantities of shellfish such as quahog, oyster, soft shell clam and scallop, as well as possible deer bone. Wolf Pit Rockshelter contained a small Pre-Colonial artifact assemblage, including quartz and chert utilized flakes, calcined bone fragments and a blue mussel shell fragment. Although the assemblage lacked temporally diagnostic artifacts, Wiegand suggested that the material dated to the Late Woodland period based primarily on its shallow depth.

Another important cluster of archaeological sites was identified by Wiegand in a 1989 survey (Wiegand 1989). The Comstock Brook sites (Sites 161-10 through 161-21) are located in Wilton about 5.5 km (3.4 miles) northwest of the Route 7 and Route 33 junction in Wilton. The sites lie between about 3.5 and 4.5 km (2-3 miles) upstream of the confluence of Comstock Brook and the Norwalk River, and appear to reflect short-term use of the Comstock Brook drainage between about 5,000 years ago and the period of European contact. This upland drainage appears to have been used primarily as a hunting and food-gathering area by relatively small groups intermittently throughout prehistory. Based on regional settlement patterns, sites like those found along Comstock Brook likely supported larger encampments located near more substantial bodies of water. The Norwalk River and Long Island Sound likely supported the majority of large residential encampments within the local area.

Site 103-49 is a multi-component site that was found within an existing interchange between Route 15 and Main Avenue, as part of Phase I, II, and II investigations for CTDOT (Jones et al. 2005; Forrest and Clouette 2007). The archaeological evidence from this site by pre-colonial and historic-period peoples spans the entire occupational history of Connecticut and

underscores the importance of this region to pre-colonial and historic peoples. Occupations during the Paleoindian, Terminal Archaic, and Early and Late Woodland periods appear to have been focused on short-term resource extraction; the proximity of this site to the Norwalk River afforded access to a variety of valuable resources. The attraction of the Norwalk River continued during the historic period. Finally, and most importantly, the location of this site, within the cloverleaf of the Main Avenue and Route 15 interchange, speaks to the overall sensitivity of this area, particularly considering the large percentage of industrially modified landscapes. The presence of this site is highly suggestive that numerous other sites lie in the immediate area on comparable landforms, where soil integrity can be established.

In sum, relatively little professional archaeological work has been conducted in the towns of Norwalk and Wilton, though the understanding of the Native American use of both towns has benefited from the efforts of the Norwalk Community College excavations and survey. There exists limited documentation for known sites, many of which have been destroyed by development. Important research questions remain unanswered for the Pre-colonial period of the region. Any sites in undisturbed contexts thus represent potentially valuable cultural resources.

B. Environmental Assessment of Archaeological Sensitivity

The archaeological information gathered during the archaeological survey of the improvements to the Route 7/15 interchange must be interpreted in the broader context of the culture history and environment of southern New England. The subsistence and settlement patterns of pre-colonial peoples were closely tied to the natural environment. Their lifeways were based on the types, abundance, and location of edible and otherwise useful natural resources. The settlement and subsistence patterns of pre-colonial Native people are therefore best understood in an environmental and ecological context. It is also necessary to understand environmental changes through time. Habitats exploited by plant, animal, and human communities developed through complex interactions between climate and landscape. The type and distribution of resources changed over the millennia; unsurprisingly, human exploitation of resources has changed in concert with landscape and biotic resource changes through time.

The quaternary (glacial and recent Holocene-era) geology of southwestern Connecticut represents a complex and dynamic process that produced much of the local landforms and ecosystems, in concert with the locally occurring bedrock geology components, such as major hills, valleys, uplands, and lowlands. Although the specific chronology of deglaciation in the Norwalk River Valley has not been determined, a state-wide quaternary geological mapping project suggests the earliest of these deposits postdate 18,000 BP and all likely predate 15,000 BP (Stone et al 2005). As glaciers began to recede and proximal (then distal) meltwater streams gouged pre-glacial sedimentary deposits and exposed bedrock, river channels became fixed across the landscape; some of these river systems were developed by 12 thousand years ago (O'Leary 1975; Stone and Randall 1978; Stone et al. 2005). This portion of the Norwalk River represents an area where the channel probably remained fixed post glacial retreat, although this has not been extensively tested. An expansive valley bottom would have provided suitable habitats for both foraging and horticultural Native groups living along the north shore of Long Island Sound. More importantly, predictable glacial meltwater and successive river systems would have provided Native peoples with a consistent set of valuable ecologic resources (water, travel routes, animals, shellfish, fish, etc.) from early colonization of this landscape to the pre- and post-contact period. Although not as broad as interior sections of the Housatonic River Valley, the level terrain surrounding the Norwalk River (a small coastal watercourse that drains a

watershed of approximately 33 square miles) would have provided ample ground and resources for seasonal aggregations of people throughout the pre-colonial period.

The Norwalk River near the project area is characterized by relatively low sinuosity and a coarse bed composed of large pebbles and gravel. Pools within the river channel are abundant, and are frequently associated with bedrock exposures (Garday et al. 2001). Although the present-day river may look considerably different than the one encountered by the earliest pre-Colonial people to settle within the area, the presence of shallow bedrock within the channel suggests the river is constrained by the glacially scoured valley bottom. Because the watercourse cannot cut through the hard bedrock, the pools within the channel of this section of river have likely been an enduring characteristic of the river. Such pools may have been the focus of fishing by pre-colonial peoples, especially in the summer months, when water levels were at their lowest. These pools would have also served as primary sources of water for people and animals during summer months, another attractive feature of this site location.

The primary constituents of the local bedrock materials are poorly suited for the manufacture of stone tools, however, relatively rare veins of quartz or finer-grained hard stone may have been exploited by pre-colonial populations in the area. Secondary deposits of gravel, such as within the Norwalk River channel and along the river banks may have presented opportunities for the collection of these materials. In fact, the notably hard and mechanically-strong qualities of quartz cobbles may have resulted in a relative abundance of this material in gravel beds, as softer cobbles were rapidly worn away by glaciers.

Wetlands themselves may also have influenced the type and redundancy of Native American use of southern New England's lands. The variation within the composition of wetland resources and their distribution on the landscape likely played an important role in pre-colonial Native American settlement patterns (Nicholas 1988; Patton 2014). Areas with a particular concentration of large marshes or swamps appear to have been preferred locations for large residential sites (e.g., Nicholas 1988; McBride and Soulsby 1989), while favorable fishing locations along rivers and large streams were often host to seasonal aggregations of people during the spring and fall fish runs (e.g., McBride 1984).

The overall distribution and general character of wetland resources within the APE vicinity suggest that larger pre-Colonial sites associated with seasonal population aggregation or redundant short-term occupations are most likely to be encountered near the Norwalk River, while smaller sites resulting from temporally isolated short-term activities such as hunting and nut-collecting are expected to reach their highest density in the upland areas surrounding the river valley. The smaller drainage and well constrained channel (see above) of the Norwalk River would have made it attractive to pre-Colonial peoples, given the predictable availability of resources. Larger river systems, such as the Housatonic River, may have offered more resources and better avenues for water travel but may have been less favorable to pre-Colonial peoples seeking long term encampments for several reasons. Large rivers are less predictable, given their increased sinuosity and discharge (leading to increased aggradation and degradation of sediment and overbank flooding), and may have represented increased competition from other pre-Colonial peoples based on the abundant resources associated with large rivers. Smaller river systems such as the Norwalk River could have provided an added draw for pre-Colonial peoples, given the predictable resources associated with these rivers during the spring floods and summer droughts. The presence of Site 103-49 and the occupation of this site from Paleoindian to Historic periods (Jones et al. 2005) is a testament to the high archaeological sensitivity of this area based on pre-colonial and historic-period resource needs.

III. ARCHAEOLOGICAL SENSITIVITY ASSESSMENT

The walkover visual assessment and soil testing of the project areas for Alternatives 21C and 26 indicated that the development of Routes 15 and 7 and the surrounding area during historic and modern periods has resulted in a highly modified and disturbed landscape overall. The area surrounding the proposed road improvements is characterized by industrial, commercial, and residential construction. The majority of the combined Area of Potential Effect (APE) for both alternatives has been previously graded using large-scale construction equipment, and has low potential for containing intact archaeological deposits (Figure 1). Visually, the disturbed landscapes are apparent and can be characterized by large push piles and blasting zones from roadway construction, machine-dug channels for river and stream courses, wetland zones created through the construction of power line corridors, abrupt topographic features between roads and adjacent landscapes, and a high density of modern buildings, roads, parking lots, and driveways. The most recent Natural Resource Conservation Soil Service (NRCS) soil survey for this area of Connecticut indicates that approximately 78% of the APE has been recently modified and can be classified as either Urban Land or Udorthents. A series of hand-powered soil probes was taken throughout the APE to confirm subsoil soil integrity (Figure 2).

Despite the presence of disturbance related to the construction of roads and buildings in the APE, seven discrete areas of potentially intact soils were identified during the walkover and subsurface soil probe survey. Several archaeologically sensitive landforms, such as intact river terraces and rockshelters, are present in these discrete areas, as are unaltered landscapes, which are all indicative of archaeologically sensitive areas. Disturbed areas are not considered archaeologically sensitive because any buried sites in these contexts have compromised integrity and thus cannot qualify for listing in the NRHP. These areas, shown on Figures 3 and 4, are assessed as having moderate to high archaeological potential for both pre-colonial Native American and historic-period sites. They are summarized below, with regard to the APE of Alternatives 21C and 26 (Table 1). All seven will be directly impacted by the construction of Alternative 21C based on the APE parameters, and four will be directly impacted by Alternative 26. Three areas (Areas 3, 6 and 7) may be far enough east of Alternative 26 that they will not be directly impacted by Alternative 26, but they may be impacted by construction-related activities such as staging areas.

Table 1: Archaeologically sensitive areas identified during Phase IA survey, and the direct impacts predicted from Alternative 21C and 2 construction

Archaeologically Sensitive Areas	Alternative 21C	Alternative 26
Area 1	Impact	Impact
Area 2	Impact	Impact
Area 3	Impact	Possible Impact
Area 4	Impact	Impact
Area 5	Impact	Impact
Area 6	Impact	Possible Impact
Area 7	Impact	Possible Impact

Area 1: Area 1 is delineated at the western edge of the project, the land on the southern side of Route 15 and the western side of Route 7, just to the west of the existing interchange system. There were access issues to this area, however, a visual inspection from Perry Avenue indicated land features that appeared undisturbed. Project maps indicate a wetland in Area 1, however, this was not visible from Perry Avenue. Both Alternative 21C and 26 will impact Area 1, which encompasses 2.42 acres.

Area 2: Area 2 is defined by the interior land of the existing northbound Route 15 off-ramp Exit 39B. Although the edges of this 4.2-acre area are marked by blasting, drilling, and landscape modification from the construction of Routes 15 and 7, the interior remains undisturbed. Intact soil sequences have developed in this area and a relict, perennial stream bed is preserved, which formed a small tributary of the Norwalk River. The topography associated with this stream bed is shown on the 1890 topographic survey for Norwich (U.S. Geological Survey 1893). Both Alternatives 21C and 26 will impact Area 2.

Area 3: Area 3 is defined by the land directly to the southeast of the existing northbound Route 15 Exit 39B and to the west of the Danbury Branch of Metro North and the Norwalk River. This area, which is part of the same landform comprising Area 2 and partially interrupted by the existing interchange loop of Route 7, is noteworthy for its intact soil development and contains a more distal section of the relict perennial stream bed described above. Area 3, which measures 2.15 acres, will be impacted by Alternative 21C, and may be impacted by Alternative 26.

Area 4: Area 4 is defined by the interior land of the existing northbound Route 7 on-ramp Exit 3 to Route 15 south-bound. Like Area 2, intact soils and landscape features are preserved in this area, including a more proximal segment of the relict perennial stream bed noted in Areas 2 and 3. Stone walls from the historic period, as well as a vestigial road, were also noted in this area. This area will be impacted by Alternatives 21C and 26. Area 4 encompasses 2.78 acres.

Area 5: Area 5 is defined by a small patch of land to the north the existing northbound Route 7 on-ramp Exit 3 to Route 15 south bound and bracketed by a highly disturbed landscape from the Route 7 construction to the west and a commercial building and parking lot complex to the east. This area preserves intact soil development and topographic continuity with Area 4. This area, which measures .55 acre, will be impacted by both Alternatives 21C and 26.

Area 6: Area 6 is defined by a small parcel of land lying immediately to the east of the Norwalk River, south of the Route 15 north-bound Exit 40A interchange, and north of a commercial building. This area preserves intact floodplain soil development, and is bracketed by an existing wetland to the east. Area 6, which measures .37 acre, will be impacted by Alternative 21C, and may be impacted by Alternative 26.

Area 7: Area 7 is defined by the land lying to the east of the existing Main Avenue on-ramp to Route 15 north-bound. This area preserves intact soil development sequences and is very close to Site 103-49, a NRHP-eligible multi-component pre-colonial Native American and historic-period archaeological site that was identified and removed as part of a previous plan for transportation improvements (Forrest and Clouette 2007). Area 7, which encompasses .82 acre, will be impacted by Alternative 21C and may be impacted by Alternative 26.

All of these areas are characterized by unaltered landscapes, topographic continuity with unaltered landscapes, or close spatial association with natural and cultural features that are archaeologically sensitive. Each of these areas also preserved intact soil development sequences. A sample of intact soils from Area 2 and disturbed soils from the APE are shown below in Figures 5 and 6.

Based on the results of the background research and Phase IA Survey, Phase IB subsurface testing is recommended for the seven discrete areas of archaeological sensitivity described above.



Figure 1: Map of APE of the Route 7/15 Interchange project (No. 102-358), shown with a natural color satellite imagery background.

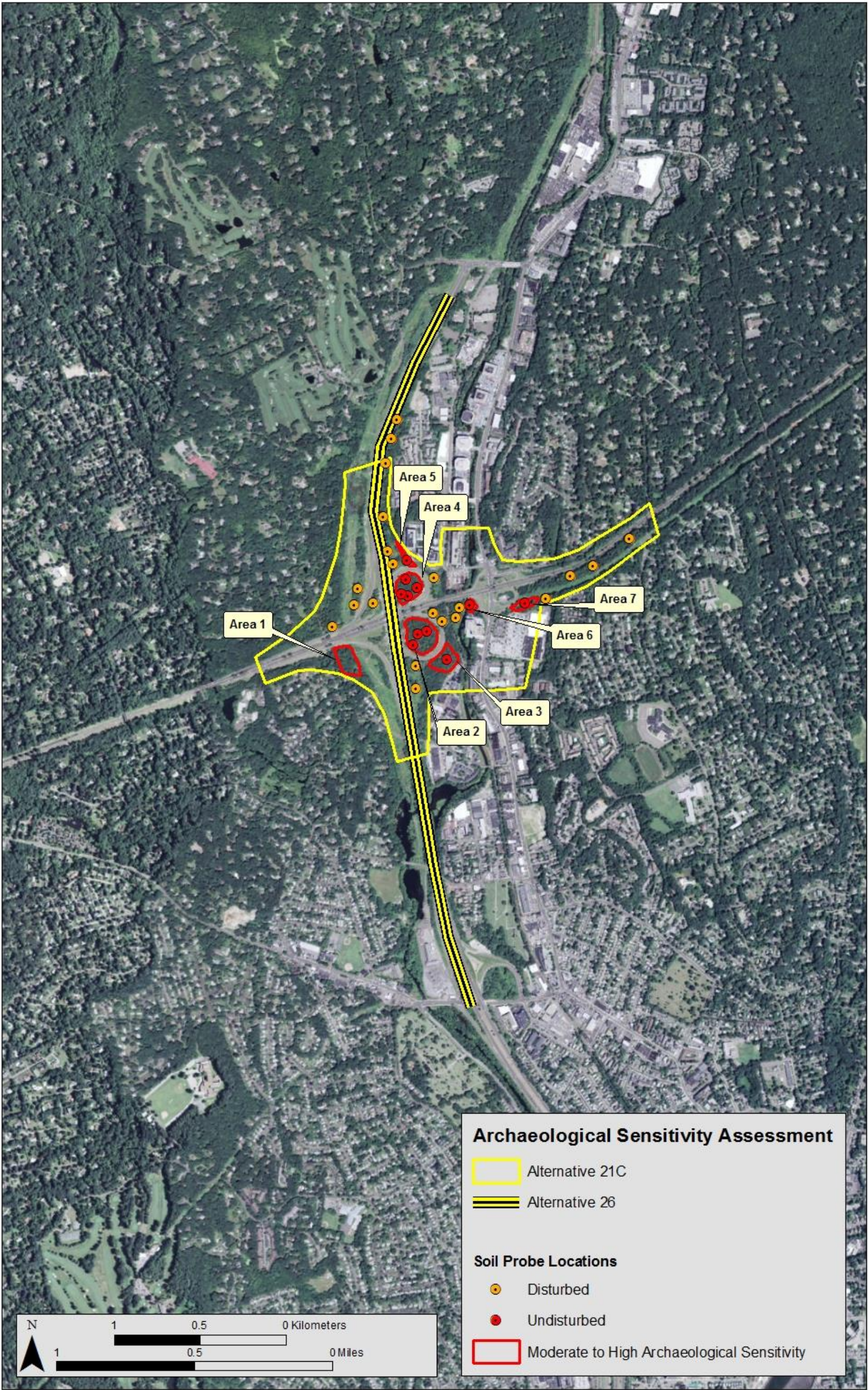


Figure 2: Map of hand-powered soil probe locations, used to delineate soil integrity and areas of archaeological sensitivity.

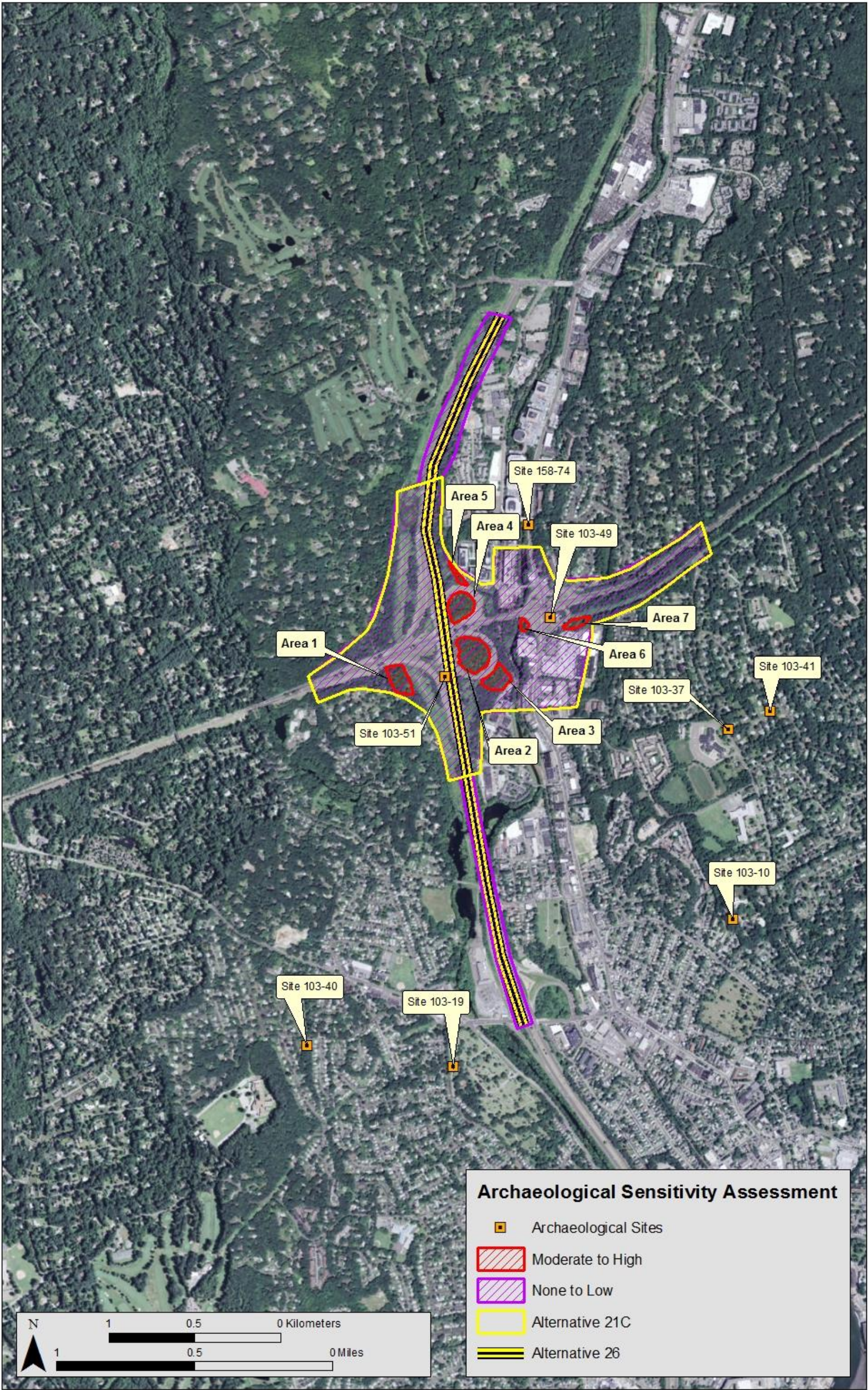


Figure 3: Map of archaeologically sensitive areas identified during Phase Ia walkover survey, shown with a natural color satellite imagery background.

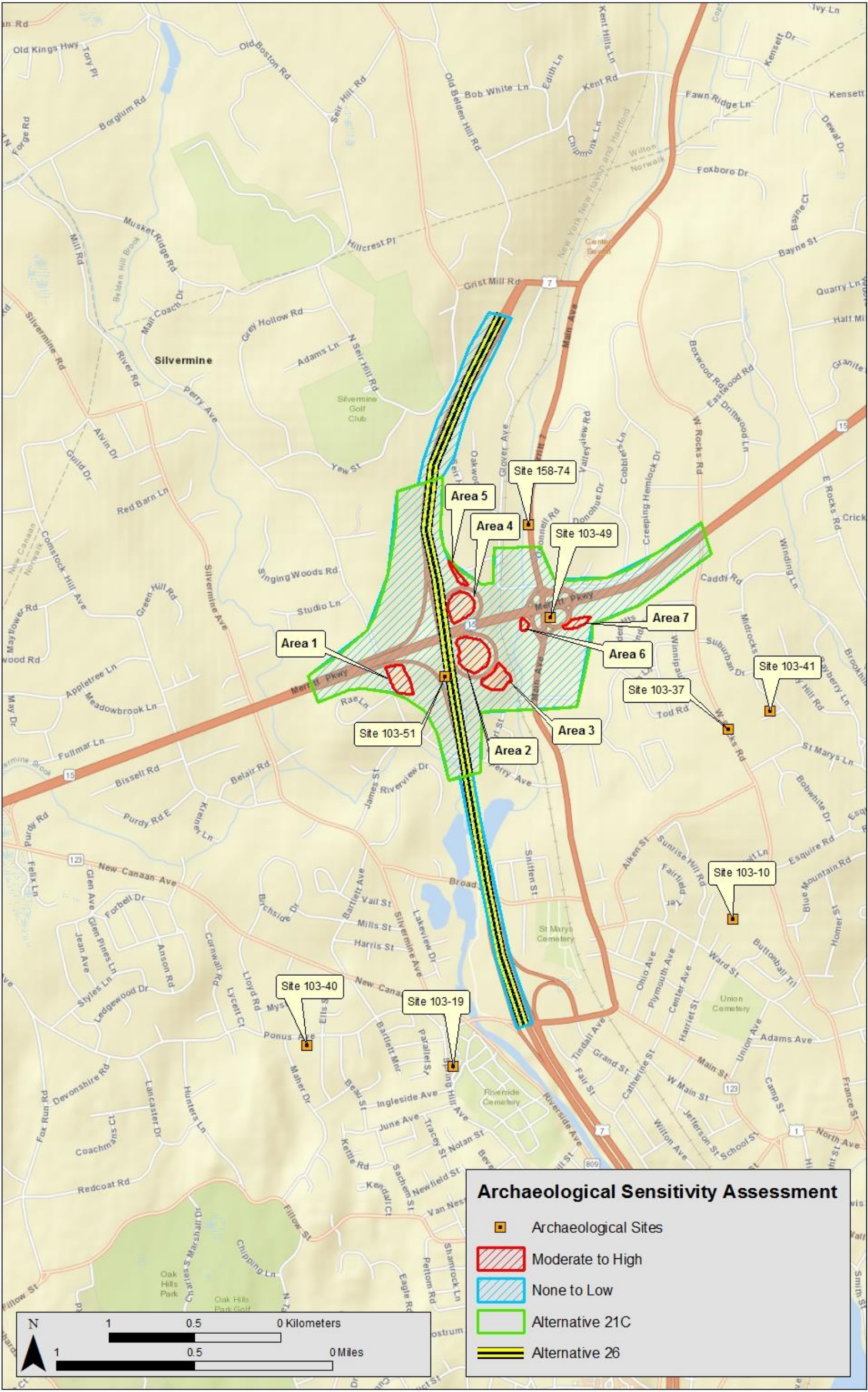


Figure 4: Map of archaeologically sensitive areas, shown with a street map background.



Figure 5: Picture of intact soil development from Area 2. A and B soil horizons are shown in this profile.



Figure 6: Disturbed soil sequence, taken from the area north of the south-bound Route 7 interchange on-ramp to south-bound Route 15. A disturbed A soil horizon is displayed, as well as a C soil horizon.

IV. HISTORIC RESOURCES CONTEXT

Norwalk was purchased from local Native Americans in 1640 and was incorporated as a town in 1651. The earliest European settlers concentrated in East Norwalk and it was here that the town was first established. The APE, located approximately three miles north of the town center, includes the areas of Silvermine and Winnipauk. Winnipauk was defined as the area on either side of Main Avenue, reaching roughly from the intersection of Linden Street north to the Wilton town line. The APE also encompasses a portion of the Silvermine neighborhood, which includes most of the northwest corner of Norwalk west of ¹.

Among the earliest settlers in Silvermine and Winnipauk were the St. John, Fitch, Whitney, BATTERY and Comstock families who arrived shortly after the town was established (Schmitt 2016: 7). The Silvermine and Norwalk rivers provided power to drive mills along their banks, while abundant forests provided building material and fuel for dwellings. The BATTERY Sawmill was one of the first mills built along the Silvermine River in 1688 (it was rebuilt in 1714 following a fire) (Library of Congress 1939).

Approximately a dozen grist, fulling, timber and oil mills lined the Silvermine River by the middle of the 19th century. Winnipauk also had several smaller mill operations along the Norwalk River, such as the Jennings Slitting Mill (now the site of the Merritt 7 office complex), built in 1794 (Grant 2014: 122). While the areas of South and East Norwalk developed quickly throughout the first half of the 19th century, Silvermine and Winnipauk remained largely agrarian in nature with a number of small thriving industries lining its waterways.

The Danbury and Norwalk Railroad was completed through Winnipauk in 1852. The line paralleled the Norwalk River providing access from Danbury to South Norwalk. The Danbury and Norwalk Railroad was leased by the Housatonic Railroad in 1886 and absorbed (as part of the Housatonic) by the New York, New Haven and Hartford Railroad in 1892. The new rail line provided direct transfer of goods, to and from Winnipauk. Soon larger mills focused on the production of wool, cotton and felt replaced the smaller concerns (Weed 1902: 170). The Lounsbury, Bissell & Company, incorporated in 1869, produced feltings and felt linings (Weed 1902: 370). Norwalk Mills, located along Glover Avenue, was started in 1863 and produced twill overcoatings.

By 1900, many of the mills in Silvermine had closed (the BATTERY Mill was the last to close in the 1950s). Silvermine reverted to a quiet farming community with an agrarian landscape dotted by falls and mill ponds. Sculptor Solon Borglum, was drawn to the area by its natural beauty and became one of the first artists to purchase a house in the area in 1906. Painters, writers, singers and inventors followed Borglum in renovating the former farmhouses and mills into homes and studios. Veurner Pratt was one such inventor who purchased the Isaac Camp house on Perry Avenue. Pratt developed one of the earliest microfilm readers in the carriage barn behind his home (Esser 2011). Exhibits were held in Borglum's barn until his death in 1922. By 1924 the Silvermine Guild of Artists was formed and in 1929 the Silvermine Tavern, a restaurant and inn began operation at the site a former mill and became the center of the community for many years.

The Sanborn map from 1912 shows that the Lounsbury and Bissell Co. (then also known as Winnipauk Mills) was still in operation producing felt. During that same period the Norwalk

¹ The boundaries of Silvermine as defined by the Silvermine Community Association extend from the Wilton and New Canaan town lines in the north, Seir Hill Road at the east, James Street at the south and BATTERY Road at the west.

Mills plant was taken over by the Norwalk Rubber & Tire Company in the early part of the 20th century. A portion of the mill still stands, albeit significantly altered at 20 Glover Avenue. Main Avenue served as the central connector north during this time.

The construction of the Merritt Parkway, which began in 1938, had a major impact on the project area, transforming it from open farmland to suburban residential area. When planning for the Parkway began in 1934, this part of northwest Norwalk consisted mainly of cleared farmland interspersed with large areas of forested land (Lynn and Wigren 1991).

Landscape designer W. Thayer Chase designed the Parkway's 300-foot right-of-way (ROW) to include two concrete paving strips, each 26 feet wide and carrying two lanes of traffic divided by a landscaped, park-like median. The ROW also incorporated 200 feet of unused space (Lynn and Wigren 1991). Chase took the existing vegetation and topography into account when creating his Parkway plan. Native trees such as scotch pines, birches, pin oaks, maples and mountain laurels were added to existing stands to create attractive vistas, while others were placed to frame brief glimpses into the surrounding countryside (Lynn and Wigren 1991).

Seventy-two original bridges (36 overpasses and 36 underpasses) were designed by George Dunkelberger to both complement and blend into the surrounding landscape. The bridges incorporated naturalistic motifs with the Art Deco, Moderne and styles, both of which evoked a sense of speed, movement, and innovation. Classical Revival (such as Perry Avenue) and rustic styles (such as the Main Avenue Bridge) are also found throughout. Dunkelberger used cast-concrete forms, colored concrete and sgraffitto were used to transform practical structures into architecturally significant works of art.

A 1934 aerial survey photograph of the APE and vicinity shows that it was mostly cleared agricultural land with some tree cover in the southwest quadrant. The area on the east side of Main Avenue consisted of long, open farm lots while the west side was more forested. Many of the smaller side streets in the area were not yet in place.

Construction of the Parkway resulted in a sharp increase in residential construction in and around the APE. This followed a trend throughout lower Fairfield County which saw farming communities transformed into New York suburbs. Silvermine remained fairly rural in character even if aerial photos show that forest had taken over much of the open land by this time. The 1954 topographic map of the area shows that the areas northeast and southeast of the Project Area remained sparsely developed while a series of smaller residential side streets appeared near the south end of Perry Avenue and west of Main Avenue.

The APE was dramatically changed in the latter half of the 20th century with the development of the multi-story Merritt 7 office complex. Construction began on the first building in 1980 and continued for the next two decades, necessitating construction of a Merritt 7 Metro North passenger station in 1985. A partial interchange at Route 7 and 15 was completed in 1992. After 2000, commercial plazas and housing complexes have continued to be built in the eastern half of the Project Area, most notably along Glover and Main Avenues.

V. ABOVE-GROUND HISTORIC RESOURCE ASSESSMENT

A windshield survey was conducted by AHS to determine the presence of potential standing historic resources within the APE for Alternatives 21C and 26. File research was also conducted to determine the presence of resources previously listed in the NR in the APE and vicinity. The areas surrounding the eastern portion of the APE, near the Main Avenue interchange, have been extensively developed since that time and now include several high-rise office towers, as well as large-scale commercial and residential properties. The areas abutting the western portion of the APE, from Main Avenue westward, are more suburban/rural in nature and include several older residential neighborhoods. Most notable of these is the Silvermine neighborhood in the northwest quadrant.

Several historic resources, listed in or eligible for listing in the NR, are within or nearby the project area and are described below and depicted on Figures 7 and 8.

Table 2: Above-ground historic resources identified during windshield survey, and the potential impacts of Alternatives 21C and 26 as currently planned

Historic Resource	Alternative 21C	Alternative 26
Verneur Pratt Historic District	Impact (Indirect)	No Impact
Silvermine Center Historic District	No Impact	No Impact
Silvermine Avenue Historic District (potential)	No Impact	No Impact
Merritt Parkway	Impact	Impact
Perry Avenue Bridge (Bridge No. 719)	Impact	No Impact
Metro North Bridge (Bridge No. 720)	Impact (Indirect)	Impact (Indirect)
Norwalk River Bridge (Bridge No. 721)	Impact (Indirect)	Impact (Indirect)
Main Avenue Bridge (Bridge No. 530 A and B)	Impact	Impact
Glover Avenue Bridge (Bridge No. 4155) (determined eligible)	Impact	Impact

Verneur Pratt Historic District (114-116 Perry Avenue)

The Verneur Pratt Historic District was listed in the NRHP in 2011 under Criteria B and C (Esser 2011). It includes a Georgian-style residence at 114 Perry Avenue, built ca. 1788 for Isaac Camp (Figure 9) and a converted barn built ca. 1800 at 116 Perry Avenue. The property was purchased in the early 20th century by Verneur E. Pratt (1891-1966), a pioneer in the development of microfilm. Pratt was specifically involved in the proliferation of the medium as a means of document storage. He added several Colonial Revival-style additions to the house and converted the barn into his laboratory. This small district is located just northwest of the project area; it may be indirectly impacted by Alternative 21C (visual effect on the district's setting). Alternative 26 will end east of the Perry Avenue Bridge and is not likely to have any direct or indirect impact on the area.

Silvermine Center Historic District

The Silvermine Center Historic District is centered around the Silvermine Tavern (194 Perry Avenue) and includes approximately 85 historic buildings in Norwalk, New Canaan and Wilton. It was listed in the NRHP in 2009 under Criteria A and C (Esser and Graziano 2009). The area first developed in the late 18th and early 19th centuries around several small mills. As the community grew the Tavern and other enterprises were established to serve the small community. The area declined after the mills failed during the latter half of the 19th century, but it was revived by a group of artists and writers in the early 20th century. It soon became a thriving artists' colony represented by the Silvermine Guild. The architecture of the area is characterized by small-scale vernacular buildings with Colonial, Greek Revival and Colonial Revival influences (Figure 10). The district is located quite some distance northwest of the project area and no direct or indirect impacts are anticipated by either of the proposed project alternatives.

Silvermine Avenue Historic District (Proposed)

The Silvermine Avenue Historic District was formally approved for National Register study by the SHPO in 2009 and listed in the State Register at that same time (Esser 2009). It includes a collection of approximately 60 residences and ancillary structures (148-285 Silvermine Avenue, 1-2 Silver River Court and 1-10 Red Barn Lane) significant under Criteria A and C. Development of the area began due to a small, agrarian-based mill industry along the banks of the adjacent Silvermine River in the 18th century. Silvermine Avenue served as the main market road between Norwalk and Silvermine during the 19th century. The area continued to develop at a steady pace in the beginning of the 20th century, with the construction of major roadways such as Route 7 and the Merritt Parkway making it an attractive bedroom community. The architecture reflects this pattern of development and includes Colonial, Victorian, Greek Revival and Colonial Revival-style houses (Figure 11). The district is located quite some distance west of the project APE; therefore, neither alternative is expected to have a direct or indirect impact on this resource.

Merritt Parkway

The Merritt Parkway was listed in the NRHP in 1991 as a district under Criteria A and C in the areas of transportation, landscape design and architecture (Lynn and Wigren 1991). It was named a State Scenic Road in 1993 and a National Scenic Byway in 1996. The district includes the entire Right-of-Way (ROW) and includes 72 original bridges constructed in the Art Deco, Art Modern and Classical Revival styles. The western portion of the Parkway within the APE resembles a modern highway rather than a scenic road (Figure 12). It features typical modern entrances, exits, and signage and lacks the landscape elements found throughout the rest of the Parkway, such as a wide, divided median with plantings. The eastern-most portion of the APE, east of the Main Avenue interchange, retains more of the Parkway's historic character, derived from the planted median strip, narrow verges and close-to-road naturalistic landscaping (Figure 13). It is anticipated that both Alternatives 21C and 26 will result in a direct impact on the Parkway because of demolition of one or more historic bridges (see below). In addition, both Alternatives 21C and 26 have the potential to impact the character of the portion of the Parkway at the eastern end of the project area if the final design includes widening of the roadways, extra lanes, or removal of existing plantings.

Perry Avenue Bridge (Bridge No. 719)

The Perry Avenue Bridge was constructed in 1936 and is a single-span, rigid-frame concrete bridge with an arched opening for the roadway (Figure 14). It is a contributing resource to the Merritt Parkway National Register district (Lynn and Wigren 1991). Architect George Dunkelberger used a mix of Art Modern and Classicism in the design, which is in keeping with many others found throughout the Parkway. It features a prominent keystone, a bas-relief of the Connecticut State Seal on the inner face of the pylons and a simple concrete balustrade. Two concrete steel-girder bridges constructed as part of the 1992 interchange project flank the structure and have a significant visual impact on the resource. Alternative 21C may result in a direct or indirect impact, while Alternative 26 will end east of the bridge and therefore will result in no impact.

Metro North Bridge (Bridge No. 720)

The Metro North Bridge was constructed in 1937 to carry the Merritt Parkway over the Metro North Railroad line (at the time of construction it was the New York, New Haven & Hartford Railroad). It is a contributing resource to the Merritt Parkway district (Lynn and Wigren 1991). The utilitarian, rigid-frame concrete skew span has a segmental-arched opening (Figure 15) and is located south of the Merritt 7 Metro North station. As currently planned, both Alternate 21C and Alternative 26 will retain the bridge. However, under either alternative, the construction of new ramps may obscure the bridge from view; currently, the public has a clear view of the bridge's north elevation from Glover Avenue. Alternatives 21C and 26 may result in indirect impacts on the bridge.

Norwalk River Bridge (Bridge No. 721)

The Norwalk River Bridge was constructed in 1938 and rehabilitated in 1988 (Figure 16). It is listed as a contributing resource to the Merritt Parkway (Lynn and Wigren 1991). It is a utilitarian, 3-span, concrete-arch bridge. A wide, raised concrete band lines each arch and the parapet wall above. Triangular pylons are found on the piers between each arch. As currently planned, both Alternate 21C and Alternative 26 will retain the bridge. However, under either alternative, the construction of new ramps may obscure the bridge from view; currently, the public has a clear view of the bridge's north elevation from Glover Avenue. Both alternatives, thus, may result in an indirect impact on the bridge.

Main Avenue Bridge (Bridge Nos. 530A and 530B)

The Main Avenue Bridge is a Classical Revival/Rustic-style concrete structure consisting of twin spans, each carrying one direction of traffic on the Merritt Parkway over Main Avenue (Route 123). Main Avenue Bridge is a contributing resource within the Merritt Parkway National Register District (Lynn and Wigren 1991). Structurally, the bridges are rigid concrete frames with shallow segmental arched openings for the roadway (Figure 17). The spans are clad in random rubble facing with rock-faced granite voussoirs, quoins and coping. The parapets and stone facing were replaced in kind as part of an extensive repair project in 2015 and 2016. Because the repairs had little effect on the structure's historic appearance (compare Figure 18 with Figure 17), it is recommended that it continue to be regarded as a contributing element. As currently planned, Alternatives 21C and 26 both anticipate replacing this set of bridges, resulting in a direct impact.

Glover Avenue Bridge (Bridge No. 4155)

The Glover Avenue Bridge (also known as the Belden Hill Avenue Bridge) is a two-span, stone-arch bridge that carries Glover Avenue over the Norwalk River (Figure 19). It has been determined individually eligible for inclusion in the NR (Clouette and Roth 1991). The bridge is rubble stone with brownstone coping and trim at the arches. It was built by the City of Norwalk in 1912. A brownstone dedication plaque on the south side of the bridge deck lists the date along with the names of city officials and engineers. Alternatives 21C and 26 both anticipate the replacement of the bridge, resulting in a direct impact. State-level documentation of this bridge has been completed.

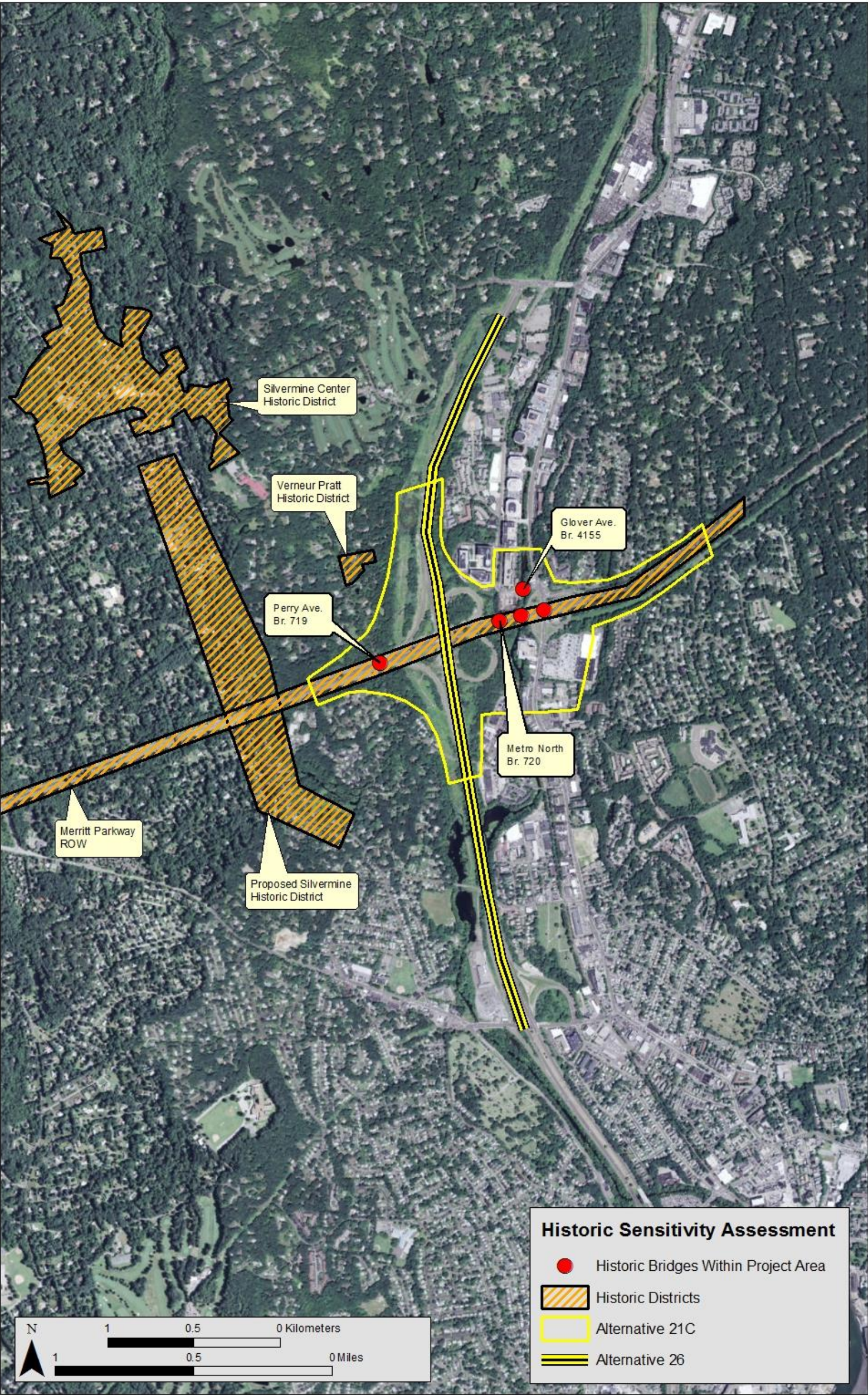


Figure 7: Map of historically sensitive areas, shown with a natural color satellite imagery background.

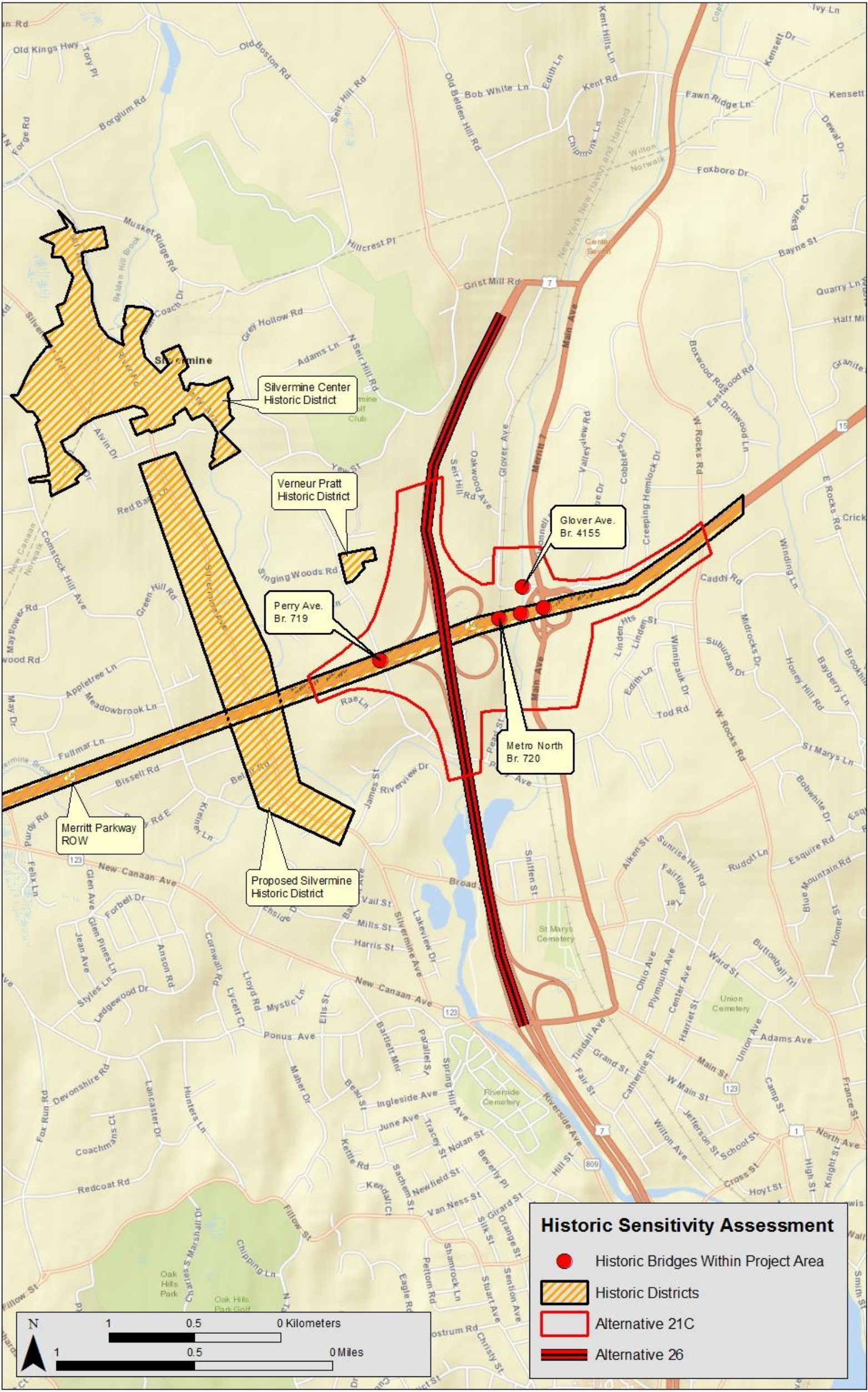


Figure 8: Map of historically sensitive areas, shown with a street map background.



Figure 9: The house at 114 Perry Avenue, the main house of the Verneur Pratt Historic District. View east.



Figure 10: The house at 304 Silvermine Avenue, located within the Silvermine Center Historic District. View north.



Figure 11: House at 177 Silvermine Avenue in the proposed Silvermine Avenue Historic District. View west.



Figure 12: Merritt Parkway looking toward the Route 7/15 Interchange from the Perry Avenue Bridge. View east. (Google Street View, September 2016)



Figure 13. Merritt Parkway looking toward Route 7/15 Interchange. View west. (Google Street View, September 2016)



Figure 14: Perry Avenue Bridge (Bridge No. 719). View north.



Figure 15: Metro North Railroad Bridge (Bridge No. 720). View south.



Figure 16: Norwalk River Bridge (Bridge No. 721). View south.



Figure 17: Main Avenue Bridge (Bridges 530A and 530B). View north.



Figure 18: Main Avenue Bridge (Bridges 530A and 530B) prior to the recent repairs (CTDOT Bridge Inspection photo, 12/2014).



Figure 19: Glover Avenue Bridge (Belden Hill Avenue Bridge, Bridge No. 4155). View northeast.

VI. REFERENCES

- Bailey, James Montgomery
1896 *History of Danbury Connecticut 1684-1896*. New York, NY: 1896 Burr Printing House.
- Beers, F. W.
1867 *Atlas of New York and Vicinity*. New York: Beers, Ellis & Soule.
- CAS, Inc.
1974 *An Archaeological Survey of the Norwalk Watershed*. UCONN CHPC #45.

1985 *An Archaeological Survey of Route 7 in the Towns of Norwalk and Danbury, Connecticut*. UCONN CHPC #282 (NPS NADB #CT-286).
- Chace, J. Jr., W.J. Barker and N. Hector
1856 *Clark's Map of Fairfield County, Connecticut*. Philadelphia, PA: Richard Clark.
- Clouette, Bruce and Matthew Roth
1991 *Connecticut's Historic Highway Bridges*. Newington, CT: Connecticut Department of Transportation.
- Esser, Philip
2009 *Silvermine Avenue Historic District*. Approval for Study document. Hartford, CT: State Historic Preservation Office.

2011 *Verneur Pratt Historic District*. National Register of Historic Places nomination form. Washington, D.C: National Park Service.
- Esser, Philip and Paul Graziano
2009 *Silvermine Center Historic District*. National Register of Historic Places nomination form. Washington, D.C.: National Park Service.
- Fairchild Aerial Survey
1934 Aerial photographs of Connecticut. Connecticut State Library, Hartford.
- Forrest, Daniel and Bruce Clouette
2007 *Phase I & II Archaeological Surveys Route 7/15 Interchange Improvements and Route 7 Corridor Improvements, Norwalk and Wilton, Connecticut, State Project Nos. 102-269 and 102-305*. Storrs, CT: Archaeological and Historical Services, Inc.
- Garday, Thom, Aaron Pugh, Charles Galgowski, Todd Bobowick
2001 *Norwalk River at South Wilton, Connecticut: United States Geological Survey Gage 01209700*. <http://wmc.ar.nrcs.usda.gov/technical/HHSWR/Geomorphic/nrwksumm.html>

- Grant, Lisa Wilson
2014 *Norwalk*. Mount Pleasant, SC: Arcadia Publishing.
- Harper, Ross
2007 *Report: Phase III Data Recovery Excavations at Site 161-23, Route 7, Wilton, Connecticut, State Project No. 102-305*. Storrs, CT: AHS, Inc.
- Jones, Brian, Ross Harper, Mary G. Harper, and Bruce Clouette
2005 *Report: Phase III Data Recovery at Site 103-49, Route 7/15 Interchange, Norwalk, Connecticut*. Storrs, CT: AHS, Inc.
- Library of Congress
1939 Buttery Mill, Silvermine Connecticut HABS CT-68.
<http://cdn.loc.gov/master/pnp/habshaer/ct/ct0100/ct0117/data/ct0117data.pdf>.
Accessed online on 1/20/17.
- Lynn, Catherine and Christopher Wigren
1991 *Merritt Parkway*. National Register of Historic Places nomination form. Washington, D.C.: National Park Service.
- McBride, Kevin A.
1984 *Prehistory of the Lower Connecticut River Valley*. Unpublished Doctoral Dissertation, University of Connecticut. University Microfilms, Ann Arbor.
- McBride, Kevin A. and Mary Soulsby
1989 *Prehistory of Eastern Connecticut: Phase I, II and III Archaeological Surveys. Relocation of Route 6/I-84*. Storrs, CT: Public Archaeology Survey Team, Inc.
- Nicholas, George
1988 Ecological Leveling: The Archaeology and Environmental Dynamics of Early Postglacial Land Use. In *Holocene Human Ecology in Northeastern North America*. George Nicholas, ed., pp. 257-296, New York: Plenum Press.
- O'Leary, D.M.
1975 Surficial geologic map of the Moodus quadrangle, Connecticut: U.S. Geological Survey Geologic Quadrangle Map G-Q-1205, scale 1:24,000.
- Patton, Jonathan K.
2014 Considering the Wet Homelands of Indigenous Massachusetts. *Journal of Social Archaeology* 14: 87-111.
- Powell, Bernard W.
1964 A Curious Scratched Design on a Connecticut Paint Stone. *American Antiquity* 30(1): 98-100.

- 1965a Spruce Swamp: A Partially Drowned Coastal Midden in Connecticut. *American Antiquity* 30(4): 460-469.
- 1965b Bitter Rock Shelter: A Stratified Connecticut Site. *Bulletin of the Massachusetts Archaeological Society* 26(3&4): 53-63.
- 1965c An Aboriginal Quartz Quarry at Samp Mortar Reservoir, Fairfield, Connecticut. *Bulletin of the Archaeological Society of New Jersey* 22: 5-11.
- 1967 Curvilinear Designs on Northeast Paintstones: A Second Find. *The Chesopiean* 5(5-6): 131-134.
- 1970 Aboriginal Trephening: Case from Southern New England? *Science* 170: 732-734.
- 1971a Note on Salwen's Comment on Archaeological potential of the Atlantic Continental Shelf. *American Antiquity* 36(2): 212-213.
- 1971b First Site Synthesis and Proposed Chronology for the Aborigines of Southwestern Connecticut. *Pennsylvania Archaeologist* 41(1-2): 30-37.
- Sanborn Map and Publishing Company
- 1912 Insurance Maps of Norwalk. New York, NY.
- 1922 Insurance Maps of Norwalk. New York, NY.
- 1950 Insurance Maps of Norwalk. New York, NY.
- Schmitt, Samuel A.
- 2016 *Silvermine*. Charleston, SC: Arcadia Publishing.
- Stone, B.D. and Randall, A.D.
- 1978 Surficial geologic map of the Plainfield quadrangle, Windham and new London Counties, Connecticut: U.S. Geological Survey Geologic Quadrangle Map GQ-122, scale 1:24,000.
- Stone, J.R., Schafer, J.P., London E.H., DiGiacomo-Cohen, M.L., Lewis, R.S., and Thompson, W.B.
- 2005 *Quaternary Geologic Map of Connecticut and Long Island Sound Basin*. Scientific Investigations MAP 2784 with explanations.
- U.S. Geological Survey
- 1893 *Topographical Maps of Connecticut*. Norwalk Quadrangle (surveyed in 1890). Hartford, CT: Connecticut Historical Society.

- 1947 Topographical Maps of Connecticut. Norwalk North Quadrangle (surveyed in 1943). UNH Dimond Library, Documents Department and Data Center. Accessed online 1/19/2017. <http://docs.unh.edu/CT/nwkn47se.jpg>
- 1951 Topographical Maps of Connecticut. Norwalk North Quadrangle (surveyed in 1949). UNH Dimond Library, Documents Department and Data Center. Accessed online on 1/19/2017. <http://docs.unh.edu/CT/nwkn51se.jpg>

Weed, Samuel Richards

- 1902 *Norwalk After 250 Years*. South Norwalk, CT: C. A Freeman Publishers.

Wiegand, Ernest A.

- 1983 *Rockshelters of Southwestern Connecticut: Their Prehistoric Occupation and Use*. Norwalk, CT: Norwalk Community College Press.
- 1989 *Archaeological Intensive Survey and Site Evaluation of the Comstock Brook Prehistoric Archaeological Sites of Structure 7A, Norwalk River Watershed*, Norwalk Community-Technical College, CHPC no. 390.

CTDOT Response to ACHP
information requests
5/2019 – 1/2020

McMillan, Mark J.

From: McMillan, Mark J.
Sent: Thursday, January 9, 2020 11:37 AM
To: 'Sarah Stokely'; Elizabeth Merritt
Cc: Fesenmeyer, Andy A.; Antoniak, Yolanda M; Eberle, John (John.Eberle@stantec.com)
Subject: FW: Follow Up: Route 7/15 Interchange Project in Norwalk

Sarah,

There is an error (doubled entry) in the link to the September §106 meeting presentation. The correct link is:

7-15norwalk.com/documents/2017-09-15_Section_106_and_4F_subcommittee.pdf

Mark

From: McMillan, Mark J.
Sent: Thursday, January 9, 2020 10:17 AM
To:
Cc: Subject: RE: Follow Up: Route 7/15 Interchange Project in Norwalk

Hi Sarah,

My apologies about the broken links. Yes, the .pdf files attached in the 10/31/2019 email are the same documents that you would have accessed via the links. With the exception of the 5/7/2019 §106 consulting party meeting presentation, these files can also be access on the project website:

<http://7-15norwalk.com/materials.php>

Yes, I did receive your email of 11/6/2019, and thank you. In response to your previous email today, I believe that we will be having a follow up meeting with the §106 consulting parties after they have had a chance to review the revised Phase I/II Cultural Resources report, though that meeting has not yet been scheduled.

If you're receiving regular updates from the project team, you probably know that there was a PAC subcommittee meeting with in September that discussed §106 and 4(f), with a focus on the landscape aspects of the Merritt Parkway. The presentation for this meeting is posted on the project website:

http://7-15norwalk.com/documents/2017-09-15_Section_106_and_4F_subcommittee.pdfhttp://7-15norwalk.com/documents/2017-09-15_Section_106_and_4F_subcommittee.pdf

Wishing you a happy and healthy 2020!

Mark

From: Sarah Stokely <sstokely@achp.gov>
Sent: Thursday, January 9, 2020 9:00 AM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>; Elizabeth Merritt <emerritt@savingplaces.org>
Cc: Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Antoniak, Yolanda M <Yolanda.Antoniak@ct.gov>; Eberle, John

(John.Eberle@stantec.com) <John.Eberle@stantec.com>

Subject: RE: Follow Up: Route 7/15 Interchange Project in Norwalk

Hi Mark,

Thank you for emailing and forwarding these materials to the ACHP.

I was not able to open the links to the pdfs. However, I believe some of the pdfs you emailed yesterday are the same pdfs you sent to us on October 31st. And, I responded to that email on November 6th. Please see attached email.

Can you confirm that you received my November 6th email? Also, let us know the best way to view the pdf links. Is that same information available on the project website? If not, we can try to use the ACHP shared drive (One drive) which allows other agencies to easily share larger files with the ACHP and other people/agencies. Let me know what works best for CDOT.

We really appreciate your thoroughness with this project and following up with the ACHP and the Nation Trust for Historic Preservation.

Sarah

From: McMillan, Mark J. [<mailto:Mark.McMillan@ct.gov>]

Sent: Wednesday, January 08, 2020 3:17 PM

To: Sarah Stokely; Elizabeth Merritt

Cc: Fesenmeyer, Andy A.; Antoniak, Yolanda M; Eberle, John (John.Eberle@stantec.com)

Subject: FW: Follow Up: Route 7/15 Interchange Project in Norwalk

Hi Sarah, Betsy,

Wishing you both a happy new year and also following up on your request for information regarding the Route 7 / Route 15 (Merritt Parkway) Interchange project in Norwalk, Connecticut. Below are links to the following documents / 3D models that were requested following a consulting party meeting held in May, 2019:

- [PDF of Section 106 Consulting Parties Meeting](#)
- Link to Purpose and Need: http://7-15norwalk.com/documents/09-18-18%20Updated%20Purpose%20and%20Need%20Statement_ACCEPTED.pdf
- [PDF of Original Design and 12 A Cross-Sections](#)
- [PDF of original design and four current alternatives](#)
- <http://vtour.123bim.com/AAHU/>

Can you let me know if you've received this email and are able to access these documents? I will follow up with a phone call to confirm in case there is some issue with the email.

Mark

Mark McMillan

Supervising Transportation Planner
Cultural Resources & Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike



Newington, CT 06131

☎ (860) 594-2135

☎ (860) 594-3028 - Fax

✉ mark.mcmillan@ct.gov

From: McMillan, Mark J.
Sent: Thursday, October 31, 2019 4:20 PM
To: 'Sarah Stokely' <sstokely@achp.gov>; 'Betsy Merritt' <emerritt@savingplaces.org>
Subject: RE: Follow Up: Route 7/15 Interchange Project in Norwalk

Hi Sarah, Betsy,

Just following up on some of ACHP's previous requests regard the models that were presented in in PAC meeting in June. I wanted to check that you'd gotten access to the models because we hadn't heard from ACHP or Betsy Merritt at the National Trust. In case you haven't received the files, I've attached them in this email.

- 1) [2019-05-07-106Consultation 7-15Norwalk.pdf](#): A copy of the presentation made on 5/7/2019
- 2) [7-15Norwalk AlternativesandOriginal.pdf](#): Plans of the interchange as proposed in the previous project compared to the alternatives (12A, 20B, 21D, & 26) currently under consideration
- 3) [OriginalDesign-CrossSection-715Norwalk.pdf](#): Cross section of the existing Parkway and the proposed original design and current Alternative 12A

We're anticipated releasing a revised draft of the Historic Resources Technical Report in the coming weeks. If either the National Trust or ACHP has additional questions or concerns that we can try to address before that draft released, please let me know.

Mark

From: Sarah Stokely <sstokely@achp.gov>
Sent: Thursday, May 09, 2019 3:35 PM
To: McMillan, Mark J. <Mark.McMillan@ct.gov>
Subject: Follow Up: Route 7/15 Interchange Project in Norwalk

Hi Mark,

I talked to Betsy Merritt this morning and she said that she would like to see the models of the alternatives.

I have an account with OneDrive (<https://onedrive.live.com/about/en-us/>) that allows me to set up a shared folder and you could upload the files to that site. I am not sure if this is feasible from your offices. But, I have done this in the past for other projects with other federal agencies and it seemed to work as a way to share larges files that cannot be emailed easily.

Let me know if you think this is a good solution and I can email you and anyone else in your office a link to the folder.

Thanks,

Sarah

Sarah C. Stokely
Program Analyst
Advisory Council on Historic Preservation
Telephone: 202-517-0224
Fax: 202-517-6381
Email: sstokely@achp.gov

[Register now](#) for the ACHP's all-new Section 106 classroom training courses in 2019!

Tribal Consultation Correspondence

April 2019

McMillan, Mark J.

From: Erik.Shortell@dot.gov
Sent: Friday, April 26, 2019 10:17 AM
To: jquinn [REDACTED]; acholewa@[REDACTED]; mturnbull@mptn-nsn.gov; mejohnson@mptn-nsn.gov; maxbrowngarcia [REDACTED]; dhnithpo [REDACTED]; brwnjbb123 [REDACTED]; temple@delewaretribe.org; bonney.hartley@mohican-nsn.gov; dkelly [REDACTED]
Cc: Speal, Charles S; Lesay, Kimberly C; McMillan, Mark J.; kurt.salmoiraghi@dot.gov; Emilie.holland@dot.gov
Subject: April 2019 Tribal Consultation

You have received 3 secure files from erik.shortell@dot.gov.

Use the secure links below to download.

Dear Tribal Representatives,

Please see consultation documents attached.

Thank you,

Erik Shortell
Transportation Specialist
Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033
860-494-7578

Secure File Downloads:

Available until: **26 May 2019**

Click links to download:

[Report draft Philarcheo AHS2019 Route7 15 Norwalk102-358.pdf](#)

26.29 MB, Fingerprint: 34049835918f6a9c1b9c39269cab9ccd ([What is this?](#))

[TransLetter PhilReptToTribes Norwalk102-358 24APR2019.pdf](#)

153.83 KB, Fingerprint: 29f27f96638bf5e5120f4cb8b07e0298 ([What is this?](#))

[April 2019 Tribal Letter to Initiate Monthly Consultation .pdf](#)

203.65 KB, Fingerprint: f4977b5d0055fb2c6cdedfc7a6e3eea5 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

CTDOT sends Phase I/II
Archaeological/Historic
Resources Report for
SHPO review
4/24/2019

McMillan, Mark J.

From: Speal, Charles S
Sent: Wednesday, April 24, 2019 1:47 PM
To: Labadia, Catherine
Cc: McMillan, Mark J.; Lesay, Kimberly C; Antoniak, Yolanda M; Fesenmeyer, Andy A.
Subject: Draft Phase II Archaeo Intensive Survey -- Route 7/15 Interchange, Norwalk 102-358

Good afternoon Cathy,

The Connecticut Department of Transportation (CTDOT), with financial assistance from the Federal Highway Administration (FHWA), proposes improvements to the interchange between Route 7 and Route 15 in the City of Norwalk. The project would involve reconfiguration of both the Main Avenue interchange (Interchange 40) and the Route 7 interchange (Interchange 39) along with addition of access ramps and alternative routing of traffic between the Merritt Parkway, Route 7, and Main Avenue. CTDOT has tasked Archaeological and Historical Services, Inc. (AHS) to investigate the full impact of the undertaking on historic properties within the project area of potential effect (APE). The results of a Phase II Archaeological Intensive Survey are in, which the Department hereby submits for your review as a supplement to the Public Report that was transmitted to all consulting parties last week. The report document can be retrieved from our Projectwise ftp site at the link at the end of this message. Please let me know if you have any problems accessing.

Description of Activity:

The Route 7/15 Interchange Improvement Project has been studied extensively since the 1950's as part of proposed improvements to the Route 7 corridor. In the early 1990's, a strategic financial analysis recommended that the existing Route 7 interchange with the Merritt Parkway be completed to provide full freeway to parkway service.

Regionally, Route 7 serves as an important north-south transportation corridor connecting Interstate I-84 in Danbury with many residential communities, Norwalk, I-95 and the Merritt Parkway. The current interchange of Route 7 and Route 15 provides connections only to and from the west, with no connection to and from the east. Travelers going to Norwalk from the east or vice versa must use the Main Avenue interchange. This places a heavy demand on Main Avenue, a four lane arterial which carries high traffic volumes to and from extensive roadside commercial and office development. During peak hours there is extensive queuing due to the combined high traffic volumes, poor roadway geometry at the interchange and inadequate traffic controls at the intersection of Main Avenue and Glover Avenue/Creeping Hemlock Drive. The overall result has been congestion, time delay and accidents along Main Avenue. The proposed interchange improvement project would reconfigure the Main Avenue intersection, add much needed access ramps and provide alternative routing of traffic between the Merritt Parkway, Grist Mill Road and Route 7. By increasing intersection capacity and reducing through-traffic volumes at Creeping Hemlock Drive, the project would result in substantial improvements to the safety and smooth flow of traffic in the area.

In the interest of compliance with Section 106 of the National Historic Preservation Act, the National Environmental Policy Act, and other relevant State and Federal cultural resource laws and directives, the CTDOT Office of Environmental Planning (OEP) and FHWA request your review and commentary on this project with regard to archaeological concerns in immediate proximity to the project area.

Potentially Affected Resources:

The potential effects of this undertaking on historic properties have been under study since the 1990's, with a memorandum of agreement (MOA) for anticipated adverse effects having been initially developed in 1999 and then amended in 2004. The historic properties understood to be adversely affected by the project at that time included the Merritt Parkway—listed both upon the National Register of Historic Places (NRHP) and as a National Scenic Byway—and the Glover Avenue Bridge, which is considered NRHP eligible according to the 1991 CTDOT Historic Bridge Inventory. It was also recognized in the MOA that archaeological resources may be present, but their nature had not been fully investigated at that time.

Archaeological surveys conducted by the Public Archaeological Survey Team, Inc. (PAST) in 2000 identified four archaeological sites that appeared to be eligible for the NRHP. In the subsequent Phase II testing, two of these sites 161-23, a post-European contact homestead and midden, and 103-49, a prehistoric multi-component encampment, were determined to be NRHP-eligible. Phase III data recovery work was undertaken at Site 103-49 when it was determined that there was no prudent and feasible means to avoid it in project construction.

Given the time that has transpired since the previous environmental studies, the project proponents hired AHS to perform a comprehensive cultural resources re-evaluation of the project. At this point, AHS has completed supplementary Phase Ib Reconnaissance Survey for the project area, identifying eight (8) pre-Colonial and two (2) post-European Contact archaeological sites, as well as Phase II Intensive Survey intended to determine eligibility for the NRHP for these potentially affected resources. The two post-Contact sites were deemed not NRHP-eligible at the Phase I level. The Phase II work suggested that four of the sites can be more effectively combined as two resources for management purposes. Thus, the project now appears to have potential impacts to a total of six (6) pre-Colonial archaeological resources.

Recommendations:

In light of the Phase II Intensive Survey work, AHS has recommended that three of the newly recognized resources (Sites 103-57, 103-58/60, and 103-61/62) could be considered eligible for the NRHP under Criterion D—potential to contribute important information about the past. The other three resources—Sites 103-54, 103-55, and 103-59—were found unlikely to contribute meaningful new data and therefore not considered eligible for the NRHP. OEP agrees with these recommendations and submits the draft field report for your review. We request that any comments you may have be returned within 30 days of receipt of this message, in accord with standard Section 106 consultation protocol.

It is our continuing pleasure to work with you regarding the protection of Connecticut's cultural heritage. We thank you for your time and input.

Link to documents:

[Report_draft PhIarcheo AHS2019 Route7_15 Norwalk102-358.pdf](#)

Accessible at:

<https://ctdot.projectwiseonline.com>

Location: CTDOT

Username: PWONLINE\Temp.One

Password: Jg69LnTr

Best Regards,

C. Scott Speal
National Register Specialist, Archaeology
Environmental Documents / Cultural Resources Unit
Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov

Correspondence with Consulting Parties

April 2019

From: Speal, Charles S
Sent: Tuesday, April 16, 2019 12:00 PM
To: Labadia, Catherine; Wisniewski, Marena; Scofield, Jenny;
'jquinn[REDACTED]'; 'acholewa[REDACTED]';
'mturnbull@mptn-nsn.gov'; 'dhnithpc[REDACTED]';
'maxbrowngarcia[REDACTED]'; 'temple[REDACTED]';
'kpenrod[REDACTED]'; 'skleppin@norwalkct.org';
'CWigren@cttrust.org'; 'jmontanaro@cttrust.org'; 'circuitrider@cttrust.org';
'director@norwalkhistoricalsociety.org'; 'tbryant23[REDACTED]';
'llevey.architect[REDACTED]'; 'dgwestmoreland[REDACTED]';
'viteretto@heritagelandscapes.com'; 'akibbe[REDACTED]';
'connecticut.chapter@sierraclub.org'; 'p.fraboni@earthplace.org';
'emerritt@savingplaces.org'; 'sworden@savingplaces.org';
'sstokely@achp.gov'; Riese, Frederick
Cc: 'kurt.salmoiraghi@dot.gov'; 'emilie.holland@dot.gov'; McMillan, Mark J.;
Lesay, Kimberly C; Doyle, Thomas H; Murphy, Lynn D.; Cherpak, Michael S;
Fiedler, Susan L; 'Melissa Pineda'; Fesenmeyer, Andy A.; Antoniak, Yolanda M;
'Eberle, John'; 'Ken Livingston'
Subject: Section 106 Subcommittee Meeting -- CTDOT Proj No 102-358, Route 7/15
Interchange, Norwalk
Attachments: CRPublicReport Route 7_15Norwalk.pdf

Greetings from the Connecticut Department of Transportation (CTDOT),

As an identified Section 106 consulting party to State Project Number 102-358 involving reconstruction of the Route 7 / Route 15 interchange in the City of Norwalk, CTDOT and the Federal Highway Administration wish to invite you to a face-to-face meeting to discuss potential project-related historic property impacts under the terms of the National Historic Preservation Act. This meeting is to be held in Room 101 of the Norwalk City Hall on May 7th from 10:00am until noon. Norwalk City Hall is located at:

125 East Avenue
Norwalk, CT 06851

There is ample free parking adjacent to the City Hall building, accessible via City Hall Drive.

You should find the Phase I/II cultural resources assessment and archaeological reconnaissance survey summary report attached to this message. This report presents anticipated impacts to the various National Register of Historic Places-listed or eligible properties within the project area of potential effect associated with the design alternatives still under consideration. The findings and recommendations presented in the report will be discussed at the upcoming meeting.

If, after the meeting, you still have questions, comments, or concerns—or feel that an important historic resource has been omitted—we invite you to respond within 30 calendar days to the email address below:

dot.environmentalplanning@ct.gov

We encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn more about the Section 106 process and your role as a consulting party. If you do **not** wish to review these documents in the future or continue as a consulting party under Section 106, please respond to us to that effect in written correspondence at the above email address.

We thank you for your time and input and look forward to seeing you at the upcoming meeting.

Sincere Regards,

C. Scott Speal
National Register Specialist, Archaeology
Environmental Documents / Cultural Resources Unit
Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov

CTSHPO concurs with project's
purpose and need statement
May 23, 2018

From: Labadia, Catherine
Sent: Wednesday, May 23, 2018 12:58 PM
To: Antoniak, Yolanda M; Thompson, Brian; Caiola, Jeff; Jacobson, Rick; Riese, Frederick; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'David_Simmons@fws.gov'; 'tom_chapman@fws.gov'; Morley, Dan D.; Wittchen, Bruce; 'Christopher.Hansen@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; Iozzo, Richard; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'; Doyle, Thomas H; Lesay, Kimberly C; Speal, Charles S; Wisniewski, Marena
Cc: 'mary.mello@dot.gov'; 'leah.sirmin@dot.gov'; 'Coronado, Sergio (FTA)'; 'margason.nathan@epa.gov'; 'timmermann.timothy@epa.gov'; Eberle, John; Fesenmeyer, Andy A.; Livingston, Kenneth; Mojica, Christopher; 'pstanton@fhiplan.com'; Rozanski, Becky
Subject: RE: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Categories: Follow up

Thank you Yolanda and Andy,
SHPO also prefers the updated text and has no additional comments.
Cathy

From: Antoniak, Yolanda M
Sent: Monday, May 07, 2018 1:54 PM
To: Thompson, Brian <Brian.Thompson@ct.gov>; Caiola, Jeff <Jeff.Caiola@ct.gov>; Jacobson, Rick <Rick.Jacobson@ct.gov>; Riese, Frederick <Frederick.Riese@ct.gov>; Aarrestad, Peter <Peter.Aarrestad@ct.gov>; 'susan.k.lee@usace.army.mil' <susan.k.lee@usace.army.mil>; 'David_Simmons@fws.gov' <David_Simmons@fws.gov>; 'tom_chapman@fws.gov' <tom_chapman@fws.gov>; Morley, Dan D. <Daniel.Morley@ct.gov>; Wittchen, Bruce <Bruce.Wittchen@ct.gov>; 'Christopher.Hansen@dot.gov' <Christopher.Hansen@dot.gov>; 'Timothy.Snyder@dot.gov' <Timothy.Snyder@dot.gov>; Newman-Scott, Kristina <Kristina.NewmanScott@ct.gov>; Mathieu, Lori <Lori.Mathieu@ct.gov>; Iozzo, Richard <Richard.Iozzo@ct.gov>; 'HRilling@norwalkct.org' <HRilling@norwalkct.org>; 'fpickering@westcog.org' <fpickering@westcog.org>; Doyle, Thomas H <Thomas.Doyle@ct.gov>; Lesay, Kimberly C <Kimberly.Lesay@ct.gov>; Speal, Charles S <Charles.Speal@ct.gov>; Labadia, Catherine <Catherine.Labadia@ct.gov>; Wisniewski, Marena <Marena.Wisniewski@ct.gov>
Cc: 'mary.mello@dot.gov' <mary.mello@dot.gov>; 'leah.sirmin@dot.gov' <leah.sirmin@dot.gov>; 'Coronado, Sergio (FTA)' <sergio.coronado@dot.gov>; 'margason.nathan@epa.gov' <margason.nathan@epa.gov>; 'timmermann.timothy@epa.gov' <timmermann.timothy@epa.gov>; Eberle, John <John.Eberle@stantec.com>; Fesenmeyer, Andy A. <Andy.Fesenmeyer@ct.gov>; Livingston, Kenneth <Kenneth.Livingston@ct.gov>; Mojica, Christopher <Christopher.Mojica@stantec.com>; 'pstanton@fhiplan.com' <pstanton@fhiplan.com>; Rozanski, Becky <Becky.Rozanski@ct.gov>
Subject: FW: 102-385 Route 7/15 Norwalk- Agency Coordination-Draft Purpose and Need Statement (Follow up)

Hello Everyone,

I'm the ConnDOT Project Engineer for the Route 7/15 Interchange and am working with Andy Fesenmeyer on this project.

As a follow up to Andy's e-mail (below) concerning the review of the updated Draft Purpose and Need Statement (rev. March 21, 2018), I am resending the attachments listed in our earlier e-mail for all to review, requesting comments/ concurrence from all Agencies, **including Agency representatives that were not able to attend our February meeting.**

To date, we have heard back from the FTA Region 1 Office and from the US Environmental Protection Agency. Both Agencies concur with our assessment to eliminate the new section "Existing Infrastructure Conditions" and have no other comments at this time.

Please take a look at the attached Draft Purpose and Need Statement (same as the one sent to you previously) and provide your feedback by **Friday, May 25th** if possible. A version with the tracked changes and Report of Meeting with the edited presentation slides is also attached for reference.

Thank you for your help and feel free to contact me or Andy should you have any questions or need additional information.

Yolanda

Yolanda Antoniak, P.E.
Project Engineer
Conn. Dept. of Transportation
Highway Design Division
Tel.(860) 594-3197

2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

Yolanda.Antoniak@ct.gov

From: Rozanski, Becky
Sent: Wednesday, April 04, 2018 2:26 PM
To: Antoniak, Yolanda M; 'sergio.coronado@ct.gov'; Doyle, Thomas H; 'Eberle, John'; Fesenmeyer, Andy A.; 'Hansen, Christopher (FHWA)'; Iozzo, Richard; Lesay, Kimberly C; 'Ken Livingston'; 'margason.nathan@epa.gov'; 'christopher.mojica@stantec.com'; Riese, Frederick; 'leah.sirmin@dot.gov'; Speal, Charles S; 'pstanton@fhiplan.com'; Wisniewski, Marena; 'bruce.witchen@ct.gov'
Cc: Thompson, Brian; Caiola, Jeff; Aarrestad, Peter; 'susan.k.lee@usace.army.mil'; 'mary.mello@dot.gov'; 'david.simmons@fws.gov'; 'john_warner@fws.gov'; 'timmermann.timothy@epa.gov'; Labadia, Catherine; Morley, Dan D.; 'eloise.powell@dot.gov'; 'Timothy.Snyder@dot.gov'; Newman-Scott, Kristina; Mathieu, Lori; 'HRilling@norwalkct.org'; 'fpickering@westcog.org'
Subject: 102-385 Route 7/15 Norwalk- Agency Coordination - Follow up

Being sent on behalf of Andy Fesenmeyer.

Thank you for attending our Agency Coordination Meeting held on Feb 28, 2018. As a follow-up, please find the following documents for your review and concurrence:

- Report of Meeting (includes edited presentation slides and notations from meeting)
- Updated Draft Purpose and Need Statement (Revised March 21, 2018)
- Updated Draft Purpose and Need Statement (with tracked changes)

The updated Draft Purpose and Need Statement (P&N) incorporates comments that we heard at the meeting.

Page 4 of the revised P&N now includes a section entitled "Existing Infrastructure Conditions" which is a general summary of the various conditions of roadways, bridges and signals suggested by some participants at the meeting. In looking at this newly added section within the context of the entire P&N document, it seems that it distracts from the intent of the P&N. As mentioned at the meeting, the infrastructure is not the driving force for the project (the linkages and traffic deficiencies are). We believe that adding this section begins to divert the focus to the infrastructure condition as a 'secondary purpose'. Also, the condition of the existing infrastructure is being addressed in the Needs and Deficiencies Report and will be included as an appendix to the EA document.

We recommend that as a group, we should consider eliminating this new section from the P&N Statement.

Please review this new section (and the other revisions) and let me know if you concur with our assessment and/ or have additional comments to the attached documents. I can be reached at (860) 594-3228 or Andy.Fesenmeyer@ct.gov.

Thanks again for your input,

Andy

Becky Rozanski
Secretary
Division of Highway Design &
Bureau Chief Office
Connecticut Department of Transportation
860-594-3158
Becky.Rozanski@ct.gov

Minutes of 2/28/2018 Agency Coordination Meeting with SHPO



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Agency Coordination Meeting

Date: February 28, 2018

Location: CTDOT Room 3130

Prepared By: Eberle, John

The Followings Meeting Minutes have been reviewed and approved by:

Reviewed by:

Yolanda Antoniak March 23, 2018

Approved by:

Andy Fesenmeyer March 23, 2018



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Agency Scoping Meeting 3

Date/Time: February 28, 2018 01:00 PM

Location: CTDOT Rm 3130

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Richard	Armstrong	Richard.Armstrong@ct.gov	CTDOT	Yes
Sergio	Coronado	sergio.coronado@dot.gov	FTA Region 1	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Chris	Hansen	christopher.hansen@dot.gov	FHWA	Yes
Rich	Iozzo	richard.iozzo@ct.gov	CT DPH	Yes
Kim	Lesay	Kimberly.Lesay@ct.gov	CTDOT	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Nathan	Margason	margason.nathan@epa.gov	US EPA	Yes
Chris	Mojica	Christopher.Mojica@stantec.com	Stantec	Yes
Frederick	Riese	frederick.riese@ct.gov	CTDEEP	Yes
Leah	Sirmin	leah.sirmin@dot.gov	FTA Region 1	Yes
Scott	Speal	Charles.Speal@ct.gov	CTDOT	Yes

Paul	Stanton	pstanton@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Marena	Wisniewski	marena.wisniewski@ct.gov	CT SHPO	Yes
Bruce	Witchen	bruce.witchen@ct.gov	CT OPM	Yes

Meeting Items

3.1

Topic: GENERAL

Status: Open

Discussion:

Andy Fesenmeyer (AF) welcomed all attendees to the meeting and gave some brief introductory remarks as to the intent of the meeting being to provide all represented agencies project background and status while specifically focusing on the Purpose and Need for the 7-15 Norwalk Interchange project.

Copies of the Draft Purpose and Need (distributed to all in early February) and the presentation were available as hand outs.

AF presented a brief recent history of the project dating back to the 2005 lawsuit through the current restarting of the project.

John Eberle (JE) gave a presentation covering the following topics:

- Project Location/Overview
- Brief Purpose of Project
- Preliminary Project Schedule
- Environmental Assessments and Data Collection to date (wetlands, floodplains, natural resources)
- Critical Project Elements
- Public Outreach completed to date

3.2

Topic: GENERAL

Status: Open

Discussion:

Paul Stanton (PS) then began the work session on Purpose and Need by reading each element in the draft for group discussion/comment. A summary of consensus edits is highlighted in the attached presentations slides.

Discussion:

Project Purpose: Minor edit on street names (Creeping Hemlock Drive).

Project Needs (Intro): No Change

-Roadway Systems Linkage: Request to spell out LOS for readers as well as specifically define the missing connections.

-Safety: Minor grammar corrections

Sergio Coronado (SC) questioned why the accident data utilized is 2012-2014 and not more recent. Chris Mojica (CM) responded that STN had been directed by CTDOT to utilize this period as there were concerns by the CTDOT that more recent period data logged was not complete and may not be a good representation of crashes. Kim Lesay (KL) was to follow-up with Traffic unit on this and advise if 2015-2017 is deemed acceptable for use.

Bruce Witchen (BW) questioned the meaning of 'vicinity' in this section. CM responded it was 1/4 mile. Fred Riese (FR) suggested perhaps the use of footnote to define would be helpful. Consensus was to add a footnote to provide definition.

-Mobility: Request to add 'transit users' to listing of users and wording change for 'access' to "accommodations"

Project Goals and Objectives

A.1.: Street name correction (Creeping Hemlock Drive)

B.: Word change.

C.: Word changes.

D.: Reformatting of paragraphs and deleting/editing repetitive phrasing on designing to scenic character.

There was a consensus by attendees that this section was unnecessarily wordy and could be streamlined. JE suggested that the crafting of the Purpose and Need with stakeholders stressed the need to identify documents and guidance. However, he suggested that the Merritt Parkway Conservancy and others were beginning to stress the 'philosophy' of the intent and rather than just rely on manuals. All agreed to maintain reference to the documents, stress philosophy but add a footnote so all of the info could be extracted from the paragraph.

There was brief discussion on the possibility of merging all paragraphs into one overall paragraph addressing designing into context as it was felt there were repetitive phrasing regarding designing to historic context for both overall design and also for bridges and landscape. JE suggested that while the topics addressing overall design and bridges could be merged, it was important given outreach and sensitivity, that the paragraph (3rd) addressing preservation and enhancing landscape where practical remain, as this was specifically crafted by PAC subcommittee and the topic has a high sensitivity.

Scott Speal (SS) suggested we need to be very careful in what is being promised as regards restorations, preservation of landscape.

3.3

Topic: GENERAL

Status: Open

Discussion:

BW commented in general that he was aware that there have been a number of projects in the area recently on the Bond Commission agenda, including Grist Mill improvements and understood there was also the Merritt 7 Rail Station work in the area. He further stated that it seemed to him that these projects might somehow be combined and that CEPA would

need to rationalize why projects in the same vicinity are not combined. He specifically suggested that the project area shown in presentation seemed to overlap with Grist Mill and there was a proposed \$7 million bonding for that work.

Rich Armstrong (RA) responded that this has been discussed within CTDOT and there was a conscious decision to separate the projects as the 7-15 project relating to linkages between major freeways had a clear and independent utility. Beginning to expand the focus of the Purpose and Need to include different projects (Grist Mill, Rail Station) would complicate the Purpose and Need.

JE added that the dashed line that BW referenced as 'project area' was a 'study area' line so that Grist Mill traffic review and analysis would be captured and incorporated into the assessment of the interchanges.

AF also suggested that different funding sources for the various projects in the area made combining difficult.

3.4

Topic: GENERAL

Status: Open

Discussion:

Chris Hansen (CH) suggested that Purpose and Need Statement was a 'game plan' for moving forward and identify what the problems are to be resolved. FR suggested that the Purpose and Need Statement might be missing an assessment of infrastructure condition that could be part of the needs. CH asked whether we needed to identify the various conditions to inform the purpose of the project.

JE stated that the infrastructure condition was not the driving force of the project so was not incorporated. A brief discussion ensued and it was suggested that next draft make an attempt to summarize infrastructure condition to provide background information. Rather than editing the various text areas speaking to transportation facilities, JE suggested adding a summary paragraph at the end of existing conditions and before the Purpose and Need section. All agreed.

3.5

Topic: GENERAL

Status: Open

Discussion:

Meeting closed with a request to all agencies to provide any additional comments they might have in the coming 3 weeks.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
109	STN to revise Draft Purpose and Need Statement based on consensus comments.	Eberle, John	03.21.2018	0.4d late	03.21.2018 11:27AM

110	Kim Lesay to check with CTDOT Traffic to assess whether use of 2015-2017 crash data was acceptable	Antoniak, Yolanda	03.28.2018	4.5d early	
-----	--	-------------------	------------	------------	--

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Agency Scoping Meeting 3

Date/Time: February 28, 2018 01:00 PM

Location: CTDOT Rm 3130

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Richard	Armstrong	Richard.Armstrong@ct.gov	CTDOT	Yes
Sergio	Coronado	sergio.coronado@dot.gov	FTA Region 1	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Chris	Hansen	christopher.hansen@dot.gov	FHWA	Yes
Rich	Iozzo	richard.iozzo@ct.gov	CT DPH	Yes
Kim	Lesay	Kimberly.Lesay@ct.gov	CTDOT	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Nathan	Margason	margason.nathan@epa.gov	US EPA	Yes
Chris	Mojica	Christopher.Mojica@stantec.com	Stantec	Yes
Frederick	Riese	frederick.riese@ct.gov	CTDEEP	Yes
Leah	Sirmin	leah.sirmin@dot.gov	FTA Region 1	Yes
Scott	Speal	Charles.Speal@ct.gov	CTDOT	Yes

Paul	Stanton	pstanton@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Marena	Wisniewski	marena.wisniewski@ct.gov	CT SHPO	Yes
Bruce	Witchen	bruce.witchen@ct.gov	CT OPM	Yes

Meeting Items

3.1

Topic: GENERAL

Status: Open

Discussion:

Andy Fesenmeyer (AF) welcomed all attendees to the meeting and gave some brief introductory remarks as to the intent of the meeting being to provide all represented agencies project background and status while specifically focusing on the Purpose and Need for the 7-15 Norwalk Interchange project.

Copies of the Draft Purpose and Need (distributed to all in early February) and the presentation were available as hand outs.

AF presented a brief recent history of the project dating back to the 2005 lawsuit through the current restarting of the project.

John Eberle (JE) gave a presentation covering the following topics:

- Project Location/Overview
- Brief Purpose of Project
- Preliminary Project Schedule
- Environmental Assessments and Data Collection to date (wetlands, floodplains, natural resources)
- Critical Project Elements
- Public Outreach completed to date

3.2

Topic: GENERAL

Status: Open

Discussion:

Paul Stanton (PS) then began the work session on Purpose and Need by reading each element in the draft for group discussion/comment. A summary of consensus edits is highlighted in the attached presentations slides.

Discussion:

Project Purpose: Minor edit on street names (Creeping Hemlock Drive).

Project Needs (Intro): No Change

-Roadway Systems Linkage: Request to spell out LOS for readers as well as specifically define the missing connections.

-Safety: Minor grammar corrections

Sergio Coronado (SC) questioned why the accident data utilized is 2012-2014 and not more recent. Chris Mojica (CM) responded that STN had been directed by CTDOT to utilize this period as there were concerns by the CTDOT that more recent period data logged was not complete and may not be a good representation of crashes.

Bruce Witchen (BW) questioned the meaning of 'vicinity' in this section. CM responded it was 1/4 mile. Fred Riese (FR) suggested perhaps the use of footnote to define would be helpful. Consensus was to add a footnote to provide definition or clarify 'vicinity'.

-Mobility: Request to add 'transit users' to listing of users and wording change for 'access' to "accommodations"

Project Goals and Objectives

A.1.: Street name correction (Creeping Hemlock Drive)

B.: Word change.

C.: Word changes.

D.: Reformatting of paragraphs and deleting/editing repetitive phrasing on designing to scenic character.

There was a consensus by attendees that this section was unnecessarily wordy and could be streamlined. JE suggested that the crafting of the Purpose and Need with stakeholders stressed the need to identify documents and guidance. However, he suggested that the Merritt Parkway Conservancy and others were beginning to stress the 'philosophy' of the intent and rather than just rely on manuals. All agreed to maintain reference to the documents, stress philosophy but add a footnote so all of the info could be extracted from the paragraph.

There was brief discussion on the possibility of merging all paragraphs into one overall paragraph addressing designing into context as it was felt there were repetitive phrasing regarding designing to historic context for both overall design and also for bridges and landscape. JE suggested that while the topics addressing overall design and bridges could be merged, it was important given outreach and sensitivity, that the paragraph (3rd) addressing preservation and enhancing landscape where practical remain, as this was specifically crafted by PAC subcommittee and the topic has a high sensitivity.

Scott Speal (SS) suggested we need to be very careful in what is being promised as regards restorations, preservation of landscape.

3.3

Topic: GENERAL

Status: Open

Discussion:

BW commented in general that he was aware that there have been a number of projects in the area recently on the Bond Commission agenda, including Grist Mill improvements and understood there was also the Merritt 7 Rail Station work in the area. He further stated that it seemed to him that these projects might somehow be combined and that CEPA would

need to rationalize why projects in the same vicinity are not combined. He specifically suggested that the project area shown in presentation seemed to overlap with Grist Mill and there was a proposed \$7 million bonding for that work.

Rich Armstrong (RA) responded that this has been discussed within CTDOT and there was a conscious decision to separate the projects as the 7-15 project relating to linkages between major freeways had a clear and independent utility. Expanding the focus of the Purpose and Need to include different projects (Grist Mill, Rail Station) would complicate the Purpose and Need.

JE added that the dashed line that BW referenced as 'project area' was a 'study area' line so that Grist Mill traffic review and analysis would be captured and incorporated into the assessment of the interchanges.

AF also suggested that different funding sources for the various projects in the area made combining difficult.

3.4

Topic: GENERAL

Status: Open

Discussion:

Chris Hansen (CH) suggested that Purpose and Need Statement was a 'game plan' for moving forward and identify what the problems are to be resolved. FR suggested that the Purpose and Need Statement might be missing an assessment of infrastructure condition that could be part of the needs. CH asked whether we needed to identify the various conditions to inform the purpose of the project.

JE stated that the infrastructure condition was not the driving force of the project so was not incorporated. A brief discussion ensued and it was suggested that next draft make an attempt to summarize infrastructure condition to provide background information. Rather than editing the various text areas speaking to transportation facilities, JE suggested adding a summary paragraph at the end of existing conditions and before the Purpose and Need section. All agreed.

3.5

Topic: GENERAL

Status: Open

Discussion:

Meeting closed with a request to all agencies to provide any additional comments they might have in the coming 3 weeks.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
109	STN to revise Draft Purpose and Need Statement based on consensus comments.	Eberle, John	03.21.2018	0.4d late	03.21.2018 11:27AM

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.



Route 7-15 Norwalk

Route 7 - 15 Interchange

State Proj. No. 102-358

Subject: Agency Scoping Meeting 3

Date/Time: February 28, 2018 01:00 PM

Location: CTDOT Rm 3130

Attendees:

First Name	Last Name	Email	Company	Attended
Yolanda	Antoniak	yolanda.antoniak@ct.gov	CTDOT	Yes
Richard	Armstrong	Richard.Armstrong@ct.gov	CTDOT	Yes
Sergio	Coronado	sergio.coronado@dot.gov	FTA Region 1	Yes
Tom	Doyle	Thomas.Doyle@ct.gov	CTDOT	Yes
John	Eberle	John.Eberle@stantec.com	Stantec	Yes
Andy	Fesenmeyer	andy.fesenmeyer@ct.gov	CTDOT	Yes
Chris	Hansen	christopher.hansen@dot.gov	FHWA	Yes
Rich	Iozzo	richard.iozzo@ct.gov	CT DPH	Yes
Kim	Lesay	Kimberly.Lesay@ct.gov	CTDOT	Yes
Ken	Livingston	klivingston@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Nathan	Margason	margason.nathan@epa.gov	US EPA	Yes
Chris	Mojica	Christopher.Mojica@stantec.com	Stantec	Yes
Frederick	Riese	frederick.riese@ct.gov	CTDEEP	Yes
Leah	Sirmin	leah.sirmin@dot.gov	FTA Region 1	Yes
Scott	Speal	Charles.Speal@ct.gov	CTDOT	Yes

Paul	Stanton	pstanton@fhiplan.com	Fitzgerald & Halliday, Inc.	Yes
Marena	Wisniewski	marena.wisniewski@ct.gov	CT SHPO	Yes
Bruce	Witchen	bruce.witchen@ct.gov	CT OPM	Yes

Meeting Items

3.1

Topic: GENERAL

Status: Open

Discussion:

Andy Fesenmeyer (AF) welcomed all attendees to the meeting and gave some brief introductory remarks as to the intent of the meeting being to provide all represented agencies project background and status while specifically focusing on the Purpose and Need for the 7-15 Norwalk Interchange project.

Copies of the Draft Purpose and Need (distributed to all in early February) and the presentation were available as hand outs.

AF presented a brief recent history of the project dating back to the 2005 lawsuit through the current restarting of the project.

John Eberle (JE) gave a presentation covering the following topics:

- Project Location/Overview
- Brief Purpose of Project
- Preliminary Project Schedule
- Environmental Assessments and Data Collection to date (wetlands, floodplains, natural resources)
- Critical Project Elements
- Public Outreach completed to date

3.2

Topic: GENERAL

Status: Open

Discussion:

Paul Stanton (PS) then began the work session on Purpose and Need by reading each element in the draft for group discussion/comment. A summary of consensus edits is highlighted in the attached presentations slides.

Discussion:

Project Purpose: Minor edit on street names (Creeping Hemlock Drive).

Project Needs (Intro): No Change

-Roadway Systems Linkage: Request to spell out LOS for readers as well as specifically define the missing connections.

-Safety: Minor grammar corrections

Sergio Coronado (SC) questioned why the accident data utilized is 2012-2014 and not more recent. Chris Mojica (CM) responded that STN had been directed by CTDOT to utilize this period as there were concerns by the CTDOT that more recent period data logged was not complete and may not be a good representation of crashes. Kim Lesay (KL) was to follow-up with Traffic unit on this and advise if 2015-2017 is deemed acceptable for use.

Bruce Witchen (BW) questioned the meaning of 'vicinity' in this section. CM responded it was 1/4 mile. Fred Riese (FR) suggested perhaps the use of footnote to define would be helpful. Consensus was to add a footnote to provide definition.

-Mobility: Request to add 'transit users' to listing of users and wording change for 'access' to "accommodations"

Project Goals and Objectives

A.1.: Street name correction (Creeping Hemlock Drive)

B.: Word change.

C.: Word changes.

D.: Reformatting of paragraphs and deleting/editing repetitive phrasing on designing to scenic character.

There was a consensus by attendees that this section was unnecessarily wordy and could be streamlined. JE suggested that the crafting of the Purpose and Need with stakeholders stressed the need to identify documents and guidance. However, he suggested that the Merritt Parkway Conservancy and others were beginning to stress the 'philosophy' of the intent and rather than just rely on manuals. All agreed to maintain reference to the documents, stress philosophy but add a footnote so all of the info could be extracted from the paragraph.

There was brief discussion on the possibility of merging all paragraphs into one overall paragraph addressing designing into context as it was felt there were repetitive phrasing regarding designing to historic context for both overall design and also for bridges and landscape. JE suggested that while the topics addressing overall design and bridges could be merged, it was important given outreach and sensitivity, that the paragraph (3rd) addressing preservation and enhancing landscape where practical remain, as this was specifically crafted by PAC subcommittee and the topic has a high sensitivity.

Scott Speal (SS) suggested we need to be very careful in what is being promised as regards restorations, preservation of landscape.

3.3

Topic: GENERAL

Status: Open

Discussion:

BW commented in general that he was aware that there have been a number of projects in the area recently on the Bond Commission agenda, including Grist Mill improvements and understood there was also the Merritt 7 Rail Station work in the area. He further stated that it seemed to him that these projects might somehow be combined and that CEPA would

need to rationalize why projects in the same vicinity are not combined. He specifically suggested that the project area shown in presentation seemed to overlap with Grist Mill and there was a proposed \$7 million bonding for that work.

Rich Armstrong (RA) responded that this has been discussed within CTDOT and there was a conscious decision to separate the projects as the 7-15 project relating to linkages between major freeways had a clear and independent utility. Beginning to expand the focus of the Purpose and Need to include different projects (Grist Mill, Rail Station) would complicate the Purpose and Need.

JE added that the dashed line that BW referenced as 'project area' was a 'study area' line so that Grist Mill traffic review and analysis would be captured and incorporated into the assessment of the interchanges.

AF also suggested that different funding sources for the various projects in the area made combining difficult.

3.4

Topic: GENERAL

Status: Open

Discussion:

Chris Hansen (CH) suggested that Purpose and Need Statement was a 'game plan' for moving forward and identify what the problems are to be resolved. FR suggested that the Purpose and Need Statement might be missing an assessment of infrastructure condition that could be part of the needs. CH asked whether we needed to identify the various conditions to inform the purpose of the project.

JE stated that the infrastructure condition was not the driving force of the project so was not incorporated. A brief discussion ensued and it was suggested that next draft make an attempt to summarize infrastructure condition to provide background information. Rather than editing the various text areas speaking to transportation facilities, JE suggested adding a summary paragraph at the end of existing conditions and before the Purpose and Need section. All agreed.

3.5

Topic: GENERAL

Status: Open

Discussion:

Meeting closed with a request to all agencies to provide any additional comments they might have in the coming 3 weeks.

Follow up Action Item(s)

Item	Description	Held By	Date Due	Status	Date Closed
109	STN to revise Draft Purpose and Need Statement based on consensus comments.	Eberle, John	03.21.2018	0.4d late	03.21.2018 11:27AM

110	Kim Lesay to check with CTDOT Traffic to assess whether use of 2015-2017 crash data was acceptable	Antoniak, Yolanda	03.28.2018	4.5d early	
-----	--	-------------------	------------	------------	--

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.



Route 7/15 Norwalk - PROJECT PURPOSE

PROJECT PURPOSE

The purpose of the project is to improve roadway system linkage between Route 7 and the Merritt Parkway at Interchange No. 39; improve the mobility for vehicles at both the Merritt Parkway's Route 7 and Main Avenue Interchanges (No. 39 & No. 40) and improve the mobility for all users (motorists, pedestrians, and cyclists) along the immediate adjacent local roadway network (Main Avenue, Glover Avenue, and Creeping Hemlock Drive); and improve safety in the vicinity of these interchanges.



Route 7/15 Norwalk - PROJECT NEED

PROJECT NEEDS

CTDOT and FHWA are undertaking the project to address deficiencies of the existing interchanges and streets in the vicinity of the interchanges.



Route 7/15 Norwalk - Roadway System Linkage

The existing Merritt Parkway and Route 7 Interchange configuration does not provide all connections ^{AV1} between Route 7 and the Merritt Parkway. As a result, approximately 250 and 125 vehicles use the Main Avenue corridor to connect between Route 7 and the Merritt Parkway during the weekday morning and weekday evening peak hours, respectively. This is approximately 5 to 15 percent of the traffic currently using the Main Avenue corridor between CT 123 and CT 15 during either peak hour. These additional vehicles contribute to peak hour congestion along the Main Avenue corridor (**Level of Service (LOS D/E)**). Providing the missing connections would allow access in all directions, eliminate the need for motorists to use Main Avenue to connect between Route 7 and the Merritt Parkway, and improve the efficiency of motorists connecting between the roadways.

Slide 25

AY1 **Define missing connections**
Antoniak, Yolanda, 2/28/2018



Route 7/15 Norwalk - Safety

The existing Main Avenue and Merritt Parkway Interchange ramps have inadequate acceleration and deceleration lanes, steep grades, sharp curves, and limited sight distance that contribute to a high number of crashes. Over a three-year **period (2012-2014)**, a total of 190 crashes have occurred along Main Avenue or on the Merritt Parkway in the vicinity of Interchange No. 40. Of those, 28 crashes have occurred on Main Avenue and 162 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange. Over a three-year **period (2012-2014)**, a total of 120 crashes have occurred along Route 7 or on the Merritt Parkway in the vicinity of Interchange No. 39. Of those, 29 crashes have occurred on Route 7 and 91 crashes have occurred on the Merritt Parkway in the vicinity of the Interchange.

Slide 27

- AY2** **Crash data update? Differences in logging of data post 2014.** Kim L. to follow up.
 Antoniuk, Yolanda, 2/28/2018
- AY3** **Clarify in the vicinity of interchange.** Chris M. 1/4 mile is area, maybe add to footnotes.
 Antoniuk, Yolanda, 2/28/2018



Route 7/15 Norwalk - Mobility

Providing vehicular connections between Main Avenue and Route 7 would improve mobility for vehicles in the interchange areas. In addition, providing local road network improvements to Main Avenue, Glover Avenue, and Creeping Hemlock Drive would improve mobility for all users (motorists, **transit users** pedestrians, and cyclists) along Main Avenue and connecting roadways. Up to approximately 250 peak hour vehicles accessing the roadways from locations north or south of the project area either originate from or are connecting between portions of Route 7 and Main Avenue in the vicinity of the Merritt Parkway interchanges. Providing for pedestrian and ~~for~~ bicycle **accommodations** would allow connections between neighborhoods, land uses, and transit facilities (e.g., Merritt 7 Railroad Station, bus stops) for pedestrians and bicyclists that currently do not exist.



Route 7/15 Norwalk - Project Goals and Objectives

Goals and objectives that provide other factors that would be considered in the alternative analyses screening process include:

A. Reduce Congestion

1. Minimize vehicular congestion at the Main Avenue/ Glover Avenue/Creeping Hemlock **Drive** intersection and the ramps connecting to/from the Merritt Parkway at Main Avenue.

B. Provide Long Term Serviceability of the Affected Roadways within the Project Area:

1. Creating opportunities for improved connections to existing and reasonably foreseeable future **alternative** modes of transportation within the project area. (i.e. surface transit, Metro-North Railroad, bicycles/pedestrians, etc.)
2. Coordinating with the City of Norwalk toward a workable solution that is compatible with city and regional initiatives.



Route 7/15 Norwalk - Project Goals and Objectives

~~C. Maximize~~ Optimize the **value gained from** Public Investment ~~with~~ **in** the

Project:

1. Utilizing cost-effective solutions that maximize capital investment over the lifespan of the project.
2. Reducing ~~short-term~~ maintenance costs of the affected bridges and roadways.
3. Minimizing the impact of construction on the traveling public and local communities **to the extent practicable**.
4. Implementing sustainable practices.



Route 7/15 Norwalk - Project Goals and Objectives

D. Integrate the Project Roadways with the Environment and Neighborhood context:

1. Creating a design that is consistent with the Merritt Parkway's historic and scenic character as documented in the National Register of Historic Places nomination and State Scenic Road design^{AY4} AY5 on, following guidelines in the Merritt Parkway Guidelines for General Maintenance and Transportation Improvements, Merritt Parkway Landscape Master Plan, and Merritt Parkway Bridge Restoration Guide.
2. Preserving and restoring existing historic bridges and structures to the extent practical; designing new bridges, structures, and roadways that are consistent with the original design intent of the Parkway in character, scale, and relation to the landscape: ^{AY6}
3. Preserving, enhancing, and/or restoring surviving historic landscape where practical or, where the landscape has been significantly altered, creating a new landscape design that is consistent with the Parkway's original design intent; in all cases to maintain the continuous and consistent historic and scenic character of the Parkway.

Slide 33

- AY5** **and the philosophy ...**
 Antoniak, Yolanda, 2/28/2018
- AY4** **Add as a footnote. Include documents such as...**
 Antoniak, Yolanda, 2/28/2018
- AY6** **Combine into one statement.**
 Antoniak, Yolanda, 2/28/2018



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

February 1, 2018

Ms. Kristina Newman-Scott
Director of Culture
One Constitution Plaza, Second Floor
Hartford, CT 06103

Dear: Ms. Newman-Scott,

Subject: Route 7/Route 15 Interchange
Norwalk, Connecticut
State Project No. 102-358
Invitation to Agency Coordination Meeting

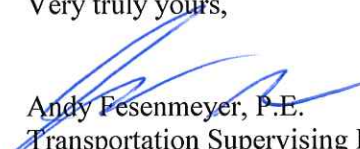
The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (Department) are initiating the Route 7/Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15), and Main Avenue in the city of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA)/Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA/CEPA.

Your agency has been identified as one that may have an interest in this project because of the resources located in the project area or permits required. Accordingly, the Department is sending you a copy of the latest Purpose and Need Statement dated January 24, 2018 for your review and consideration, including a project study area map. You are also encouraged to visit the project website to learn more at www.7-15norwalk.com. A public Project Scoping Meeting was held on October 17, 2017 and formal notice of this meeting was published in the *Connecticut Environmental Monitor* on October 3, October 17, and November 7, 2017.

The Department would like to invite you to participate in an Agency Coordination Meeting being held Wednesday, February 28, 2018 at 1:00 p.m. in Room 3130 at CTDOT Headquarters, 2800 Berlin Turnpike, Newington, Connecticut. Please let us know if you or your designee will be attending.

If you have any questions or comments regarding the enclosed project information, the Department encourages you or your designee to either attend the agency coordination meeting or contact me directly, at Andy.Fesenmeyer@ct.gov or (860) 594-3228.

Very truly yours,


Andy Fesenmeyer, P.E.
Transportation Supervising Engineer
Bureau of Engineering and Construction

Enclosure
cc: John Eberle, Stantec
Kenneth Livingston, FHI

Tribal Consultation Correspondence

December 2017



U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

December 28, 2017

628-2 Hebron Avenue
Suite 303
Glastonbury, CT 06033
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HEO-CT

Dear CTDOT Cultural Resources Unit:

The Federal Highway Administration (FHWA) has conducted and concluded tribal consultation for transportation undertakings, as requested by your office. FHWA electronically delivered information about applicable undertakings to Federally-recognized Indian tribes who have an identified area of interest in the project area.

The following undertakings have undergone tribal consultation:

102-358: Route 7/15 Norwalk Project (Norwalk, Fairfield County)

106-128: Interchange 58 Improvements on Rt 15 at Rt 34 (Orange, New Haven County)

110-136: Major Intersection Improvements – Rt 6 at N Main St and Agney Ave (Plymouth, Litchfield County)

144-196: Intersection Improvements on Rt 108 at Silver Ln and Armory Rd (Trumbull and Stratford, Fairfield County)

FHWA received the following response(s) from Indian tribes¹:

Indian Tribe	Response received?	Summary of response
Mohegan Tribe	Yes	State No: 106-128: No adverse effects to historic properties if site is avoided as mentioned. State No: 144-196: No Historic Properties . State No: 110-136: No Historic Properties
Mashantucket Pequot Tribal Nation	No	

¹ Original responses are attached to this document

Narragansett Indian Tribe	No	
Delaware Tribe of Indians	No	
Delaware Nation	Yes	No concerns
Stockbridge Munsee Community	Yes	SPN 110-136 is not in the Tribe's area of interest

With this letter, Tribal consultation is concluded for the undertakings identified herein. Please work with our office to resolve any substantive comments provided by Tribes. FHWA appreciates your continued cooperation in tracking Tribal consultation outcomes and your assistance in ensuring that commitments made to Tribes are met. If you have any questions, please contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov

Sincerely,

Chris Hansen
Environmental Protection Specialist
FHWA Connecticut Division

FHWA Correspondence with Consulting Parties

November 21, 2017

From: Hansen, Christopher (FHWA)
Cc: ["Speal, Charles S"](#); ["Mark.McMillan@ct.gov"](#); [Doyle, Thomas H](#); [Zimyeski, Melanie S](#); [Fesenmeyer, Andy A](#); [Antoniak, Yolanda M](#); [Eberle, John \(John.Eberle@stantec.com\)](#); [Powell, Eloise \(FHWA\)](#)
Bcc: [Riese, Frederick](#); ["susan.fiedler@ct.gov"](#); ["emerritt@savingplaces.org"](#); ["sworden@savingplaces.org"](#); ["Labadia, Catherine"](#); [Scofield, Jenny](#); ["skleppin@norwalkct.org"](#); ["Christopher Wigren"](#); ["jmontanaro@cttrust.org"](#); ["circuitrider@cttrust.org"](#); ["jgsmyth@cttrust.org"](#); ["jill@merrittparkway.org"](#); ["Calabrese, Michael N"](#); ["info@norwalklandtrust.org"](#); ["director@norwalkhistoricalsociety.org"](#); ["tbryant23@norwalkhistoricalsociety.org"](#); ["llevey.architect@norwalkhistoricalsociety.org"](#); ["dgwestmoreland@norwalkhistoricalsociety.org"](#); ["viteretto@heritagelandscapes.com"](#); ["akibbe@norwalkhistoricalsociety.org"](#); ["connecticut.chapter@sierraclub.org"](#); ["p.fraboni@earthplace.org"](#)
Subject: Consulting Party Introduction Message - Route 7/15 Norwalk Project
Date: Tuesday, November 21, 2017 3:52:00 PM

Good day,

You are receiving this communication because you have been identified as a consulting party to Connecticut State Project Number 102-358, involving reconstruction of the Route 7/Route 15 interchange, under the provisions of Section 106 of the National Historic Preservation Act.

The purpose of the [Route 7/15 Norwalk Project](#) is to provide missing connections between Route 7 and Route 15 (Merritt Parkway), and improve mobility, access, and safety for all users.

I encourage you to review the Advisory Council on Historic Preservation's [A Citizen's Guide to Section 106 Review](#) to learn about the Section 106 process and your role as a consulting party.

Very soon, you will be receiving the Phase Ia cultural resources assessment / technical report for the preliminary design alternatives under evaluation for this undertaking. We invite you to review this report and ask that you respond within 30 calendar days of receiving it with any comments, concerns, or omissions you find.

While the Federal Highway Administration (FHWA) is the lead federal agency, the Connecticut Department of Transportation (CTDOT) is responsible for administering many Section 106 responsibilities on behalf of FHWA. Going forward, please direct comments and questions to:

Mr. Scott Speal
National Register Specialist
Office of Environmental Planning
Connecticut Department of Transportation
Phone: 860-594-2918
Email: dot.environmentalplanning@ct.gov

If you do not wish to review this document or continue as a consulting party under Section 106, please respond to Mr. Speal to this effect in written correspondence at the above email address.

If correspondence by email is a problem for your organization, please contact Mr. Speal to arrange for alternative delivery.

If you have any questions or concerns, please feel free to contact me. We thank you for your time and input and look forward to working with you toward preservation and effective management of Connecticut's cultural heritage.

Sincere regards,

Chris Hansen

Environmental Protection Specialist

Federal Highway Administration

628-2 Hebron Avenue, Suite 303

Glastonbury, CT 06033

860.494.7577

christopher.hansen@dot.gov

Correspondence with CT SHPO
re: initiation of consultation
May 3, 2017

From: Speal, Charles S
Sent: Wednesday, May 3, 2017 9:29 AM
To: Labadia, Catherine
Subject: Initiation of Consultation -- CTDOT Proj No 102-358 in Norwalk

Hello Cathy,

OEP would like to initiate consultation with your office under Section 106 of the NHPA, NEPA and CEPA with regard to Improvements to the Route 7 / Route 15 Interchange in the City of Norwalk. Please find attached an introduction letter including the draft Purpose and Need Statement, which should have already been transmitted to your office separately, and a Phase Ia cultural resource assessment survey of the proposed project area. Invitations to project status and progress meetings will be forthcoming in the near future.

Feel free to contact with any questions.

Best,

C. Scott Speal
National Register Specialist, Archaeology

Office of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131
Phone: 860-594-2918
Fax: 860-594-3028
Charles.Speal@ct.gov

Tribal Consultation Correspondence

April - May 2017

From: Hansen, Christopher (FHWA) <christopher.hansen@dot.gov>
Sent: Friday, April 21, 2017 3:58 PM
To: James Quinn; Turnbull, Marissa; Max Garcia; Temple University Archaeology; Nekole Alligood
Cc: 'brwnjbb123[REDACTED]'; 'dhnithpc[REDACTED]'; Powell, Eloise (FHWA); McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy
Subject: April 2017 Tribal Consultation
Attachments: MOA_Southbury130-165_ca2014.pdf; RABER ASSOCIATES - DRAFT ARCHAEOLOGICAL DATA RECOVERY REPORT - PROJECT 130-165 - 03-20-17.pdf; 4-04-17 102-358 Draft Purpose and Need Statement_v4.docx

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division

From: Hansen, Christopher (FHWA) <christopher.hansen@dot.gov>
Sent: Monday, May 22, 2017 6:26 PM
To: McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy
Cc: Powell, Eloise (FHWA)
Subject: FW: April 2017 Tribal Consultation
Attachments: 0174-0405 Dist4 TribalConsultPackage May2017.pdf

The April 2017 Consultation is complete. I only heard a response from Delaware Nation – please see attached.

Chris

From: Hansen, Christopher (FHWA)
Sent: Friday, April 21, 2017 3:56 PM
To: 'James Quinn'; 'Turnbull, Marissa'; 'Max Garcia'; 'Temple University Archaeology'; 'Nekole Alligood'
Cc: 'brwnjbb123'; 'dhnithpo'; Powell, Eloise (FHWA); 'Mark.McMillan@ct.gov'; 'Speal, Charles S'; 'Ranslow, Mandy'
Subject: April 2017 Tribal Consultation

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division

From: [Kimberly Penrod](#)
To: [Hansen, Christopher \(FHWA\)](#)
Cc: [Kimberly Penrod](#)
Subject: RE: April 2017 Tribal Consultation
Date: Wednesday, April 26, 2017 9:17:18 AM

Chris,

Thanks for the update and reaching out to me.

The website is great and very informative. I look forward to working with you on this project.

Here are our main concerns with any project:

1. Keeping a 50-100 ft (at least) area of protection around known sites.
2. Maintaining the buffer area and not allowing heavy equipment to impact these areas.

Compression is an issue of concern for us.

And if something is found, halting all work, contacting us within 48 hours and when work resumes discussion of a monitor if needed.

The protection of our tribal cultural resources and tribal trust resources will take all of us working together.

With the information you have submitted we can concur at present with this proposed plan.

As with any new project, we never know what may come to light until work begins.

The Delaware Nation asks that you keep us up to date on the progress of this project and if any discoveries arise please contact us immediately.

If you need anything additional from me please do not hesitate to contact me.

Respectfully,

Kim Penrod

Delaware Nation

Director, Cultural Resources/106

Archives, Library and Museum

31064 State Highway 281

PO Box 825

Anadarko, OK 73005

(405)-247-2448 Ext. 1403 Office

[REDACTED]

[kpenrod](#) [REDACTED]

From: Hansen, Christopher (FHWA) [mailto:christopher.hansen@dot.gov]

Sent: Tuesday, April 25, 2017 10:52 AM

To: Kimberly Penrod

Cc: Powell, Eloise (FHWA)

Subject: FW: April 2017 Tribal Consultation

Dear Ms. Penrod,

I am looking forward to working with you. Feel free to call or email me or my supervisor Eloise Powell if you ever have questions or concerns on proposed projects or the FHWA program in Connecticut.

Thank you,
Chris

Chris Hansen

Environmental Protection Specialist

Federal Highway Administration

Connecticut Division

860.494.7577

christopher.hansen@dot.gov

From: Nekole Alligood [mailto:NAlligood [REDACTED]]

Sent: Tuesday, April 25, 2017 8:57 AM

To: Hansen, Christopher (FHWA)

Subject: RE: April 2017 Tribal Consultation

Good morning, please send all future information on projects to Kim Penrod at [kpenrod \[REDACTED\]](mailto:kpenrod [REDACTED]). I am no longer performing 106 reviews for the Delaware Nation. I have forwarded this message on to her.

Thank you,
Nekole

From: Hansen, Christopher (FHWA) [mailto:christopher.hansen@dot.gov]

Sent: Friday, April 21, 2017 2:58 PM

To: James Quinn; Turnbull, Marissa; Max Garcia; Temple University Archaeology; Nekole Alligood

Cc: 'brwnjbb123 [REDACTED]'; 'dhnithpo [REDACTED]'; Powell, Eloise (FHWA); Mark.McMillan@ct.gov; Speal, Charles S; Ranslow, Mandy

Subject: April 2017 Tribal Consultation

Hello Tribal consultation representatives,

Please see below and attachments for information on transportation projects proposed in Connecticut. I expect to send another package of projects in about two weeks. As always, please call or email me if you have any questions or concerns.

130-165: Replacement of Spruce Brook Road (Bridge No. 05032) (Southbury)

FHWA invites you to review and comment on a Phase 3 Data Recovery report that was prepared for project 130-165 in Southbury. A MOA was prepared to resolve adverse effects on May 17, 2004. The Data Recovery report has finally been developed and released.

102-358: Route 7/Route 15 Interchange (Norwalk)

The Federal Highway Administration (FHWA) and Connecticut Department of Transportation (CTDOT) are initiating the Route 7 / Route 15 Interchange Project (State Project No. 102-358) in Norwalk, Connecticut. The project focuses on improving connections between Route 7, the Merritt Parkway (Route 15) and Main Avenue in the City of Norwalk. Due to the involvement of both federal and state funds, compliance with both the National Environmental Policy Act (NEPA) and Connecticut Environmental Policy Act (CEPA) is required. It is anticipated that a joint Environmental Assessment (EA) / Environmental Impact Evaluation (EIE) will be prepared to satisfy the requirements of NEPA / CEPA.

We are sending you a copy of the Draft Project Purpose and Need Statement for your review and consideration along with a project study area map. We also encourage you to visit the project website to learn more at www.7-15norwalk.com. In the coming months, a project scoping meeting will be held per the requirements of CEPA. The scoping meeting will be noticed in the Connecticut Environmental Monitor, a bimonthly publication of the Connecticut Council on Environmental Quality, which can be accessed online at www.ct.gov/ceq/site/default.asp.

Consultation Initiation

With this letter, the FHWA is inviting your Tribe to consult on concerns that may affect your Tribe related to the proposed transportation projects.

Purpose of Government-to-Government Consultation

The purpose of Government-to-Government consultation as described in the National Historic Preservation Act, Section 106, and Federal Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," is to ensure Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FHWA undertakings that may uniquely or significantly affect tribes.

Confidentiality

We understand that you may have concerns regarding the confidentiality of information of area or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FHWA Contact Information

You may contact Chris Hansen by telephone at 860-494-7577 or by email at christopher.hansen@dot.gov.

We respectfully request that you contact FHWA within thirty days (30) of your receipt of this correspondence as to your interest in Government-to-Government Consultation regarding these proposed actions. If you have any questions please do not hesitate to contact me.

Sincerely,

Chris Hansen

Environmental Protection Specialist
Federal Highway Administration
Connecticut Division
860.494.7577
christopher.hansen@dot.gov

On behalf of:

Amy Jackson-Grove
Division Administrator
FHWA Connecticut Division

Tribal Consultation Correspondence
March-April 2016

From: Eloise.Powell@dot.gov [mailto:Eloise.Powell@dot.gov]
Sent: Tuesday, April 05, 2016 5:16 PM
To: Speal, Charles S; McMillan, Mark J.; Ranslow, Mandy; Connecticut.FHWA@dot.gov
Cc: christopher.hansen@dot.gov
Subject: TRIBAL CONSULTATION CONCLUDED: March 2016 Package out for Tribal Consultation is Concluded

Good Afternoon,

The March Tribal Section 106 Coordination Package was sent to all Tribal Nations on March 3, 2016. The due date for their responses back to us was 30-days from this date, which has now past. We only received an official response back from the Mohegan Tribe on March 18, 2016 and the Delaware Tribe on March 11, 2016, which were provided to you on March 21 and March 11, 2016, respectively.

Tribal Consultation is now officially closed for the March 2016 package of projects, other than the few projects which are still under additional consultation.

Please move forward with these projects. If you have any questions, please give me a call.

Thank you,

Eloise

Eloise F. Powell | ***Team Leader for Planning, Environment & Research***

Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov



Delaware Tribe Historic Preservation Representatives
P.O. Box 64
Pocono Lake, PA 18347
temple@delawaretribe.org

March 11, 2016

Federal Highway Administration
Connecticut Division Office
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033
Att: Eloise Powell

RE: March 2016 Tribal Consultation Package

Dear Ms. Powell,

Thank you for notifying the Delaware Tribe of the projects in Connecticut. Please see the comments below regarding the Delaware Tribe interests in each project.

- State Project 78-TBD: Replacement of Bridge #05650 South Main Street #1 over Fawn Brook-Marlborough, Connecticut – **No objection to the project.**
- State Project 102-358: Route 7 / 15 Interchange Improvement Project, Norwalk, Connecticut – **We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 131-203: Farmington Canal Heritage Trail – Southington, Connecticut- **No objection to the project.**
- State Project 155-171: Safety and Capacity Improvements on I-84 – West Hartford, Connecticut – **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 167-108: Rehabilitation of Heroes Tunnel (Bridge #00773), Route 15 through West Rock Ridge- Woodbridge / New Haven – **We concur with the Office of Environmental Planning's finding and we look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**

- State Project 170-3346: Roadway Weather Information System Implementation, Statewide - **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**
- State Project 174-392: Installation of Traffic Control Signals – District 4, Connecticut - **No objection to the project.**
- State Project 174-400: Installation of Traffic Control Signals in District 4 – Various, Connecticut - **We request a Phase Ib archaeological survey be conducted in all previously undisturbed areas prior to construction. We look forward in receiving the cultural resource evaluation for the APE and will hold determination of effect until report is received.**

We respectfully request additional project details on the projects indicated above so that we may determine the potential impacts to resources of cultural and religious significance to the Delaware Tribe. Thank you for your cooperation. If you have any questions, feel free to contact this office by phone at (610) 761-7452 or by e-mail at temple@delawaretribe.org.

Sincerely,

A handwritten signature in black ink on a light-colored, textured background. The signature appears to be 'Susan Bachor' written in a cursive, flowing style.

Susan Bachor
Delaware Tribe Historic Preservation Representative

From: Eloise.Powell@dot.gov
Sent: Monday, March 21, 2016 9:30 AM
To: Speal, Charles S; McMillan, Mark J.
Cc: Ranslow, Mandy
Subject: FW: Mohegan Response for February/March Tribal Consultation Package

FYI and use.

Thanks, Eloise



Eloise F. Powell | Team Leader for Planning, Environment & Research

Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

From: James Quinn [<mailto:jquinn>] [REDACTED]
Sent: Friday, March 18, 2016 3:07 PM
To: Powell, Eloise (FHWA)
Cc: Autumn Cholewa
Subject: Tribal Consultation Package

Hello Eloise,

I have reviewed the latest tribal consultation package you recently sent my office. Please see my comments below:

- State Project # 174-400: In the recommendations, OEP suggests needing to see preliminary design plans before advancing 106. I concur with that approach and request the new design plans for review when available in order to make a more informed decision.
- State Project #170-3346: The recommendations state that any impacts to cultural resources will be managed through design. Can you please provide my office with those designs when available?
- State Project #167-108: I support the recommendation for a Phase I archaeological survey of the APE due to the potential new ground disturbance in the area determined by OEP to have been historically undeveloped. Please send along any archaeological reports that may result of this recommendation.
- State Project #102-358: Please send any relevant information regarding the proposed re-evaluation effort.

Please note No Properties for the following:

- State Project # 155-171

- State Project # 131-203
- State Project #78-TBD
- State Project #174-392

Thank you for the opportunity to review the above projects. Please feel free to contact me with any question you may have regarding the above.

Best regards,
James

James Quinn
The Mohegan Tribe
Mohegan Tribal Historic Preservation Officer & Archaeology Department Manager
13 Crow Hill Rd.
Uncasville, CT
Office: 860-862-6893
Cell: 860-367-1573

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:52 PM
To: Connecticut.FHWA@dot.gov; Alexander, Mark W
Cc: McMillan, Mark J.; Speal, Charles S; Ranslow, Mandy;
christopher.hansen@dot.gov
Subject: March 2016 Section 106 Tribal Consultation
Attachments: Section 106 Tribal Consultation Package-CT DOT, March 2016; March 2016
Section 106 Tribal Consultation Package; March 2016 Section 106 Tribal
Consultation Package; March 2016 Section 106 Tribal Consultation Package;
March 2016, Section 106 Tribal Consultation

For your records, the March 2016 Section 106 Tribal Consultation was sent to the 5 Tribal Nations today, March 3, 2016. The 30-day comment period starts today.

If you have any questions, please give me a call.

Thanks, Eloise



Eloise F. Powell | Team Leader for Planning, Environment & Research

Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 11:57 AM
To: jquinn [REDACTED]
Subject: Section 106 Tribal Consultation Package-CT DOT, March 2016

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi James,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. This is the first time I've attached "folders," so please let me know if the folders actually contain the individual project files. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[James Quinn MT THPO Section 106 Consultation 03 03 16 .pdf](#)

544.36 KB, Fingerprint: f9c92b99ec368eb84df010b1d5e01450 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 763869bfde7f5df0b243752b1076e5f1 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 3860f50373fa0affb95d738080b91a7d ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: 969dfc7b7a406fe7b9fc713a1e209261 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 1132cc1e9e249cb0cc1f7b944103f3c9 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: f26a84437b2680e5ff989748a80bfa68 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 4c062430d2a01f00abea5d5d514223a4 ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 4ba00b245cae0fd16dc9a6366d7134a9 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 0a8df404e91b4236d44ef74c04555184 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:08 PM
To: mturnbull@mptn-nsn.gov
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Marissa,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Marissa Turnbull MP THPO Section 106 Consultation 03 03 16.pdf](#)

548.33 KB, Fingerprint: b609c6f40458ea5baebffdddf198cf29 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 4c8580c2cc933221a358938a340cf922 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 903ff48207ff881a268cf2558a1f5d18 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: afa24e2c3ec0e1ed6166486fede15f88 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 90dd52332f1d8239fafdb1b72ff46345 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: cb24b64a182e4e9449c21702fe5a985e ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: e2f33582ccd80ad4fd4e12179feb78ac ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 7a425199d52303a68132113d8dd60434 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 72c10808c7a394261d75e892f7c5077f ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:19 PM
To: temple@delawaretribe.org
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Susan,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Susan Bachor DT THPO Section 106 Consultation 03 03 16.pdf](#)

552.55 KB, Fingerprint: 96704fc7cfdbba86652a0267d8d6f36e ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 97431ea15e72ddc1ebcdc450129ea6b9 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 49a7f324b70d9742c22f28f7ed7c22a9 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: e02ab4236c140e51457de76fb04c7d77 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: 36f840813d87ea897781acdc20ed1968 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: ad0dc3c2830894eeff5c44d1db0518c8 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 9693d9ab1cb2141b7b44620d613db210 ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 2322b9953cfa56ce01d4e4d8c4953b07 ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 8042f1f80b8b888255b565f9f1e79d5c ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:34 PM
To: nalligood [REDACTED]
Subject: March 2016 Section 106 Tribal Consultation Package

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi Nekole,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[Nekole Alligood DN THPO Section 106 Consultation 03 03 16.pdf](#)

559.85 KB, Fingerprint: ab7e18d59c28e4d673d851c44dbc7d77 ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 1866237775deaa019560837aaa24d7f2 ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: bf256c037d3a105cc101ea9afe55efc9 ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: d7a5eb0b3429b9cfc6b719880001ebc7 ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: e3096efbdca8e1fedf7e7b0a8ba677e7 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: 46bcee69979dea47c934519798aa9f45 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: e7340d648d665155dfae4483c42a9dea ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 0f0ac450e66fca1ed9d4e56979c5493c ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: 0291f8ae68b2870367e04aa3ec96fbca ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)

From: Eloise.Powell@dot.gov
Sent: Thursday, March 3, 2016 12:48 PM
To: dhnthp[REDACTED]
Subject: March 2016, Section 106 Tribal Consultation

You have received 10 secure files from Eloise.Powell@dot.gov.

Use the secure links below to download.

Hi John/Doug,

Attached, please find the March 2016 Tribal Consultation package for your review and comment. Please let me know if you have any questions.

Thanks, and have a wonderful day.

Sincerely,
Eloise

Team Leader for Planning, Environment & Research
Federal Highway Administration | Connecticut Division Office
628-2 Hebron Avenue, Suite 303 | Glastonbury, CT 06033
860.494.7566 | Fax: 860.659.6724 | eloise.powell@dot.gov

Secure File Downloads:

Available until: **02 April 2016**

Click links to download:

[John Brown NT THPO Section 106 Consultation 03 03 16.pdf](#)

482.57 KB, Fingerprint: f77235d3aa5a8164882d42a60f82cfde ([What is this?](#))

[Februrary 2016 Project Summaries.docx](#)

24.15 KB, Fingerprint: b6b2719600056f792a9e774ef6df1165 ([What is this?](#))

[78-TBD.zip](#)

7.94 MB, Fingerprint: 295ee86dbee47e58516c53caf067e62e ([What is this?](#))

[102-358.zip](#)

549.59 KB, Fingerprint: 8d545db96e6f3589101d985ba5b70d9b ([What is this?](#))

[131-203.zip](#)

5.51 MB, Fingerprint: 5fd056b670d15358a03006caa339666b ([What is this?](#))

[155-171.zip](#)

2.60 MB, Fingerprint: e6264900234a3246b3525d86484c6c50 ([What is this?](#))

[167-108.zip](#)

6.73 MB, Fingerprint: 76c76c4a6f3f5514e7d6a5cbb656ed58 ([What is this?](#))

[170-3346.zip](#)

31.11 MB, Fingerprint: 004e3988645d69f14d4e4f76b3064873 ([What is this?](#))

[174-392.zip](#)

12.67 MB, Fingerprint: 0206557d629557c5059b63964df7fc9a ([What is this?](#))

[174-400.zip](#)

10.61 MB, Fingerprint: bc225231949bc46c31407aaf275cf5c6 ([What is this?](#))

You have received attachment link(s) within this email sent via Accellion Secure File Transfer. To retrieve the attachment(s), please click on the link(s). To learn how your company can benefit from Accellion Secure File Transfer, please visit <http://www.accellion.com>

Secured by [Accellion](#)



STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546



Transmittal:

From:	C. Scott Speal	Date: February 16, 2016
Through:	Mark W. Alexander	
To:	Michelle Herrell	
	Environmental Protection Specialist, FHWA	

Project:	State No.:	102-358
	F.A.P. No.:	NH-7(122)
	Project Title:	Route 7 / 15 Interchange Improvement Project
	Town:	Norwalk

Subject:	Tribal Consultation Documentation
-----------------	-----------------------------------

Abstract:

The Connecticut Department of Transportation (CTDOT), with financial assistance from the Federal Highway Administration (FHWA), proposes improvements to the interchange between Route 7 and Route 15 in the City of Norwalk. The project would involve reconfiguration of the Main Avenue intersection and add access ramps and alternative routing of traffic between the Merritt Parkway, Grist Mill Road and Route 7. CTDOT has tasked a cultural resource firm to investigate the full impact of the undertaking on historic properties within the project area of potential effect (APE). No formal recommendation will be advanced on this undertaking until more information is available through the environmental re-evaluation effort and renewed consultation, though the expectation is that the project will ultimately have an adverse effect on historic properties.

Description of Activity:

The Route 7/15 Interchange Improvement Project has been studied extensively since the 1950's as part of proposed improvements to the Route 7 corridor. In the early 1990's, a strategic financial analysis recommended that the existing Route 7 interchange with the Merritt Parkway be completed to provide full freeway to parkway service.

Regionally, Route 7 serves as an important north-south transportation corridor connecting Interstate I-84 in Danbury with many residential communities, Norwalk, I-95 and the Merritt Parkway. The current interchange of Route 7 Freeway and Route 15 provides connections only between Expressway 7 and Route 15 to and from the West, with no connection to and from the east. Travelers going to Norwalk from the east or *vice versa* must use the Main Avenue interchange. This places a heavy demand on Main Avenue, a four lane arterial which carries high traffic volumes to and from extensive roadside commercial and office development. During peak hours there is extensive queuing due to the combined high traffic volumes, poor roadway geometry at the interchange and inadequate traffic controls at the intersection of Main Avenue and Glover Avenue/Creeping Hemlock Drive. The overall result has been congestion, time delay and accidents along Main Avenue. The proposed interchange improvement project would reconfigure the Main Avenue intersection, add much needed access ramps and provide alternative routing of traffic between the Merritt Parkway, Grist Mill Road and Route 7. By increasing intersection capacity and reducing through traffic volumes at Creeping Hemlock Drive, the interchange improvements would result in substantial improvements to the safety and smooth flow of traffic in the area.

In the interest of compliance with Section 106 of the National Historic Preservation Act, the National Environmental Policy Act, and other relevant State and Federal cultural resource laws and directives, the CTDOT Office of Environmental Planning (OEP) and FHWA request your review and commentary on this project with regard to any Native concerns within or in immediate proximity to the project area.

Potentially Affected Resources:

The potential effects of this undertaking on historic properties have been under study since the 1990's, with a memorandum of agreement (MOA) for anticipated adverse effects having been initially developed in 1999 and then amended in 2004. The historic properties understood to be adversely affected by the project at that time included the Merritt Parkway and the Glover Avenue Bridge, both listed upon the National Register of Historic Places (NRHP). It was also recognized in the MOA that archaeological resources may be present, but their nature had not been fully investigated at that time.

Archaeological surveys conducted by the Public Archaeological Survey Team, Inc. (PAST) in 2000 identified four archaeological sites that appeared to be eligible for the NRHP¹. In the subsequent Phase II testing, two of these sites 161-23, a post-European contact homestead and midden, and 103-49, a prehistoric multi-component encampment, were determined to be NRHP-eligible. Phase III

¹ *Phase I and II Archaeology Surveys, Route 7/15 Interchange Improvements and Route 7 Corridor Improvements, State Projects Nos. 102-269 and 102-305.* Archaeological and Services Inc. (2007), CHPC no. 1580.

data recovery work was undertaken at Site 103-49 when it was determined that there was no prudent and feasible means to avoid it in project construction².

Given the time that has transpired since the previous environmental studies, the project proponents have hired Archaeological and Historical Services, Inc. to perform a comprehensive cultural resources re-evaluation of the project.

Recommendations:

No formal recommendation will be advanced on this undertaking until more information is available through the re-evaluation effort, though the expectation is that the project will ultimately have adverse effects on historic properties, including State Archaeological Site 103-49 and the Glover Avenue Bridge, at minimum. We also request, however, any insight you may be able to provide with regard to Native concerns within or in immediate proximity to this proposed project. It is our continuing pleasure to work with you regarding the protection of Connecticut's Native American cultural heritage. We thank you for your time and input.

Attached Documents:

- | | |
|--|--|
| <input checked="checked" type="checkbox"/> | CTDOT Environmental Review Request Form and Supporting Documents |
| <input checked="checked" type="checkbox"/> | Historic Properties Review Map |
| <input checked="checked" type="checkbox"/> | Design Plan Norwalk 102-358 |
| <input checked="checked" type="checkbox"/> | Cultural Resources SOW – AHS, Inc. |

² *Phase III Data Recovery at Site 103-49, Route 7/15 Interchange, State Project No. 102-269*, Archaeological and Historical Services Inc. (2005), CHPC no. 1370.