

To: **Connecticut Department of Transportation (DOT)**

Mr. Neil Patel, Project Manager

DOTProject56-316@ct.gov

Re: **Project 0056-0316**

February 22, 2021



The Greenwich Tree Conservancy is a non-profit group of over 800 supporters whose mission is to preserve and enhance Greenwich's urban forest to benefit the community, its health and its quality of life. U.S. Route 1, the NY & New Haven Railroad, the Merritt Parkway, and Interstate 95 pass through Greenwich. These transportation corridors cut Greenwich into 5 separate defined areas. Recently, we have experienced clear cutting along the Merritt Parkway, I-95, and the New York and New Haven Railroad.* CTDOT moves from project to project never assessing the impacts to the communities within these transportation corridors as a whole. Each project literally chips away at our urban forest one tree at a time!

In January, the Connecticut Department of Transportation held a meeting to discuss the latest Project 0056-0316 to repair the road surfaces and the 22 bridges between Exit 2 to Exit 6. This plan includes estimates of a two-acre loss of trees, and as indicated at the meeting, some of these removals are for staging of equipment. As this is considered a repair project, the Town of Greenwich was told the project does not meet the requirement for a noise study/evaluation. In addition, there is no budget to mitigate the loss of trees.

The Greenwich Tree Conservancy urges you to:

- Document all trees that are anticipated to be removed;
- Provide documentation and a site plan of tree removals to local officials for review and consensus;
- Work with local officials to develop a plan and provide mitigation funds for re-planting species in removal areas.

This is a \$200+ million project. One-half of one percent of this project would be approximately \$200,000 which would go a long way toward remediation and developing wooded corridors for environmental, community health, and storm resistance benefits while maintaining motorist safety.

Connecticut's transportation corridors, which include 964 miles of state roads and 629 miles of passenger and freight rails, produce 38% of CT's greenhouse gases. Their wooded rights-of-way (ROW) are part of our state's extensive urban edge forest and are managed by the Connecticut Department of Transportation (CTDOT). Unfortunately, clear cutting, whether for maintenance or road improvements, has been the favored vegetative management strategy along transportation corridors throughout the state. This management approach is inconsistent with the goals of the recent Governor's Council on Climate Change report: ***Taking Action on Climate Change and Building A More Resilient Connecticut for All***, which recognizes the importance of protecting and enhancing our forests, whether in urban or rural areas, for both climate mitigation and adaptation/resiliency benefits.

The Federal Highway Administration's (FHWA) [Roadside Revegetation: An Integrated Approach to Establishing Native Plants 2007](#) manual presents a thorough guide that could be successfully applied to this project by working together with our Town Tree Warden. The repair project on I-95 is an opportunity to rebuild better, together, and our Town Tree Warden Dr. Gregory Kramer, with a PhD in plant biology, would be an invaluable source in developing a re-vegetation plan.

As the manual notes:

*Where modification and increased capacity are needed, ecological health, safety, and efficient transport should not be seen as mutually exclusive goals. Understanding roadside environments, how they interface with adjoining lands, and how to minimize environmental impacts has become a key focus of the Federal Highway Administration (Fekaris 2006). Given political will and proper levels of attention, **integration of environmental concerns with transportation can result in significant gains.***

<https://highways.dot.gov/federal-lands/design/library/roadside-revegetation>

Property Values and Noise

With recent CTDOT clear cutting, many Town residents have expressed their dissatisfaction at the increased noise they have experienced due to Right-of-Way (ROW) tree removal in the transportation corridors. Last March, [Realtor.com](#) added a Noise Level feature with a Noise Map which actually defines Traffic Noise, Airport Noise, and Local Noise. A Bruce Park Avenue home that borders the railroad tracks and I-95, indicates *Overall noise High* and *Traffic Noise High*. These ratings devalue property and can be found along all the properties that border the ROW's, both north and south of the highway and railroad.



There are various methods of noise abatement and this project may require sound barriers, combining hardscape and greenscape solutions. We need to take a multilayered approach in Connecticut to increase the benefits of a “No-Net-Loss” healthy natural roadside environment. A reforestation plan should be completed before work on I-95 can begin, to ensure the plans are consistent with Connecticut’s current environmental goals and standards. The Federal Highway Administration Revegetation manual notes: *“As roads are modified or updated section by section, a tremendous opportunity presents itself to remedy the oversights of the past, mitigating environmental impacts and improving conditions for healthy ecosystems.”*

Why isn’t CTDOT following the FHWA guidance? Imagine what could be achieved if CTDOT and the Town worked together along our transportation corridors. Resilient urban forests and traveler safety are not mutually exclusive!

CTDOT surprised everyone with the visionary and efficient approach they took when installing a new Stamford bridge at Exit 9. After preliminary work, the actual bridge was successfully installed over seven lanes of I-95 highway in just a few weeks. CTDOT has shown that visionary projects are possible. The Greenwich Tree Conservancy encourages CTDOT to continue on this visionary path that prepares CT for the future.

Greenwich is the Gateway to Connecticut. CTDOT has a responsibility to do no further harm, to mitigate the damage that has been done, and to work with the Town of Greenwich and other community stakeholders. Connecticut is filled with beauty, let travelers see trees and vegetation that store carbon, clean our air, provide flood control, and provide food and respite for migrating birds. Let us work together to make the Greenwich Gateway beautiful again! We would appreciate a response to our concerns.

Respectfully submitted by,
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JoAnn Messina – Executive Director
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ADDENDUM

***GATEWAY TO CONNECTICUT AND NEW ENGLAND: A LOCAL PERSPECTIVE**

Since early colonial times, Greenwich has been a gateway to Connecticut and New England. The expansion from the first transportation corridor to today has been dramatic.

- “The Country Road” which later became **U.S Route 1**
- **New York & New Haven Railroad** expanded travel from horse and buggy to the railroad in about 1849. (Photo: NY Public Library)
- **The Merritt Parkway** is one of just a few highways listed in the National Register of Historic Places opened in 1938.
- **Interstate 95** in Connecticut, opened in 1958, closely follows the state's southern coast.



These 4 transportation corridors have cut Greenwich into 5 separate pieces. CTDOT moves from project to project never assessing the impacts to the communities within these transportation corridors as a whole. Each project literally chips away at our urban forest one tree at a time!

Where is the data to answer these questions about right-of-way clear cutting!

- How many acres of trees have been lost?
- How much has noise increased in Greenwich?
- What has been done to our environment?
- Has flooding increased?
- How much more air pollution are our residents now experiencing?
- The vegetative management practice of CTDOT is to use pesticide to prevent regrowth. Because of these management practices, how large is the increased load of pesticides running onto our parks and beaches, and into Long Island Sound?

Since 1998, from just across our border, the residents of Greenwich have experienced the traffic congestion, noise, air pollution and environmentally concerning NY State “Last Mile” project that ends at the NY/CT border. When this project finally comes to an end, Project 0056-0316 will begin. These projects back-to-back places an enormous burden on the residents of Greenwich.

Cc:

State Senator Alex Kasser
State Representative Stephen Meskers
State Representative Harry Arora
State Representative Kimberly Fiorello
First Selectman Fred Camillo
Selectman Jill Oberlander
Selectman Lauren Rabin
Deputy DPW Commissioner James Michel
Town Tree Warden Dr. Gregory Kramer
Pam Sucato, CTDOT