



Monday, October 18, 2010

Mr. Micheal Grzywinski
Office of Long Island Sound Programs
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

**Re: OFFICE OF LONG ISLAND SOUND PROGRAMS
Notice of Tentative Determination and
Notice of Coastal Consistency Review
Application #201005365-MG and FCC #201005371-MG
Towns of East Lyme and Waterford**

Dear Mr. Grzywinski:

I am writing you on behalf of the East Lyme Public Trust Foundation, Inc. as its President. In response to your Department's call for comments on Application #201005365-MG and FCC #201005371-MG, and specifically to the applicant's proposed modification of a work trestle and installation of a temporary cofferdam, we appreciate this opportunity to document our position.

We support your intended approval of the proposed permit modification and, urge that you approve it with all deliberate speed. The highest priority of the proposed work sequence modification is to allow the immediate placement of sheet pile at the toe of slope of the proposed groin. This will result in the enclosure of the groin foot print, which will minimize and essentially eliminate turbidity from entering the surrounding open bay waters during temporary and then permanent groin construction. It will also, and most importantly, immediately enable the groin to trap long shore sediments as they drift eastward¹. The sooner the proposed modifications are approved, the sooner the project can be advanced to take full advantage to intercept littoral drift sediments along the Niantic Bay shoreline. The consequent accretion of sediments will establish a beach coincident with reconstruction of the Niantic Bay Overlook public park (a.k.a. Boardwalk), which our Foundation has worked to create and protect for twenty years of funding, permitting, and trouble-shooting. Our collective and individual experience supports the fact that the littoral drift is substantial and moves from west to east, as demonstrated by the rapid accretion of *Hole in the Wall Beach* immediately after its groin was constructed in 1973.

As a professional coastal zone ecologist, and a practicing Environmental Professional², and responsible for the first federal Environmental Impact Statement in 1979, prepared by the Federal Railroad Administration to permit Amtrak's replacement of the Niantic River Bridge, I found that

¹ See Figure 1.

² The Academy of Board Certified Environmental Professionals #02010409. <http://www.abcep.org/>

long-shore currents in Niantic Bay were consistently carrying sediments easterly (see Figure 1). Therefore, the proposed groin will function to trap and retain those sediments. Augmentation of that accretion by the addition of 73,000 cubic yards of sand, as specified in the existing permit conditions, is welcome but may not be needed if the project takes advantage of natural accretion resulting from the 2010-2013 storm seasons that will place sand on to the new groin-induced beach. Based on Figure 1 and the proposed groin design, I estimate that an 11.15 acre new beach will be created. The Amtrak request for modification to its Section 401 Clean Water Permit should be immediately approved in order to take full advantage of the 2010-2011 storm seasons. Once the groin is in place, the state, the community, and the Overlook Park will reap substantial benefits in the public trust by the reconstructed Overlook Park and its new beach, thus increasing free public access along the Connecticut coast line to Long Island Sound by approximately 10%.

In addition to the need to approve the proposed modifications in order to expedite building the groin, there are two additional reasons to approve the proposed modifications:

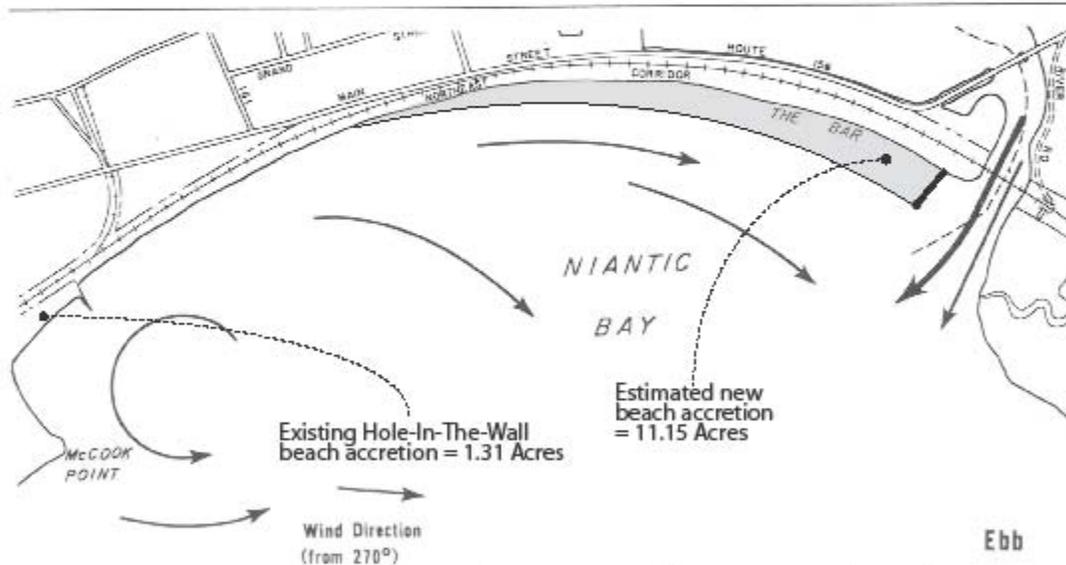
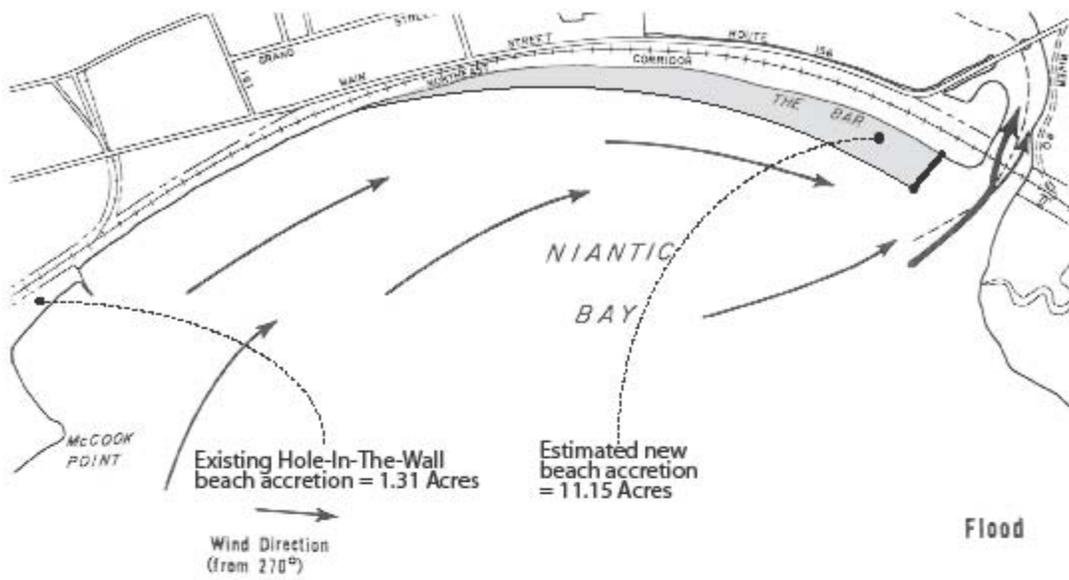
- 1) The trestle and groin modifications will permit greater environmental sensitivity and efficiency in delivering materials to the face of the work site along its one-half mile long beach front. Project related truck traffic will be significantly reduced on state and municipal roadways by about two thirds. That is, approximately 86,000 tons of rock will be diverted from truck traffic to barges. Rip-rap stone will be moved along the beach front from its barge delivery at the temporary groin to the foot of the concrete sheet pile retaining wall along the upper beach line by two large Volvo quarry dump trucks. Such construction traffic will not involve infrastructure outside the construction site. Therefore, disruption of road traffic and rail traffic, were side dump gondola cars used, will be essentially eliminated. The relatively long duration of placing individual rip-rap armor stone, each weighing approximately 3.4 tons, along the half-mile of reconstructed coastline, is mitigated by the proposed modifications due to the important efficiencies of using water born transport to move stone.
- 2) These proposed modifications that modify construction material delivery also afford significant safety benefits to the public. They eliminate traffic disruptions, pedestrian and vehicular conflicts, and wear and tear on state and municipal infrastructure.

We are pleased with the progress thus far achieved by the project team. We look forward to completion of the project in 2013 and the reopening of the reconstructed Overlook and its exceptional new beach. Thank you for your help in achieving this important state, regional, and municipal goal.

Sincerely yours,



Robert S. De Santo, Ph.D.
President



Scale = 500 ft./div.

<p>Figure 1. After the Final Environmental Impact Statement, published May 24, 1979, Washington, DC, by the Federal Railroad Administration, Page 74 (Fig. 3-11). Full report is available as a 52 MB PDF file from: http://www.publictrustfoundation.org/focus.htm.</p>		<p>Northeast Corridor Improvement Project Federal Railroad Administration, Department of Transportation</p> <p>Figure 3-11 Niantic River Bridge</p> <p>GENERALIZED CURRENTS FOR FLOOD AND EBB TIDES</p>
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