Summary Table of Impacts, Mitigation, and Commitments

Appendix 2-1 provides the following summary table of mitigation and commitments for the Walk Bridge Replacement Project. To track mitigation plans and permit conditions to be developed in final design, CTDOT will use FTA's Project Management Plan, working in coordination with the City of Norwalk, the local community, and regulatory agencies. As the lead federal agency, FTA exercises continual oversight and independent review of the project. Additionally, the project's commitment to mitigation measures will be reviewed by federal and state regulators.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Rail Transportation (EA/EIE Sections 3.1 & 5.3.1)	Temporary two-track outage will be needed for up to 30 months. Limited four-track outages will be required for specific construction activities.	CTDOT will maintain weekday passenger train service by keeping at least two tracks in service throughout nearly all the construction period. CTDOT will schedule limited four-track outages required during construction time during an off-peak and/or weekend period, to the extent possible.
		CTDOT will complete planned independent NHL-improvement projects on the main line and Danbury Branch prior to implementing the long-term, two-track outages; these projects will facilitate considerable train movement flexibility on the NHL main line and minimize schedule adjustments associated with long-term two-track outages. Refer to CTDOT Issue Paper: Early-Action NHL Projects with Independent Utility.
		CTDOT will minimize temporary impacts to rail traffic by coordinating the construction of the project with the East Avenue Bridge Project (Bridge No. 42.14) and associated roadway and the Osborne Avenue Bridge Project (Bridge No. 41.96). Refer to CTDOT Issue Paper: Coordinating Construction with Osborne and East Avenue Projects.
		CTDOT will work with Metro-North, Amtrak, and freight service providers to ensure that train operations proceed in a manner that maintains service, facilitates passenger boarding and alighting at East Norwalk and South Norwalk Stations, and prioritizes the overall safety of the railroad corridor.
Marine Transportation (EA/EIE Sections 3.2 & 5.3.2)	For most of the 40-month construction period, one or both channels will be open to navigation, and the replacement bridge project footprint will not encroach upon the existing channels. Temporary navigation restrictions will occur. The swing span will remain operational until shortly before its removal. A limited number of full channel closures will be needed for specific construction activities.	CTDOT will coordinate channel closures with the City of Norwalk, Norwalk Harbor Management Commission, the Norwalk Harbor Master, the U.S. Coast Guard (USCG), the U.S. Army Corps of Engineers (USACE), and waterway users to the maximum extent possible.
		CTDOT will develop and implement a Marine Transportation Plan and a series of water-dependent use/waterfront access strategies, working in coordination with the affected marine-based businesses, the City of Norwalk, and the Norwalk Harbor Management Commission. The Plan will address temporary impacts to water-based businesses, marina users, rowers, and ferry and vessel operations. Individual plans or strategies may be developed with owners and water-users. As a component of the Marine Transportation Plan, CTDOT will coordinate with the City of Norwalk Police and Fire Departments, water-dependent businesses, the Connecticut Department of Energy and Environmental Protection (CTDEEP), and the USCG to develop and update emergency preparedness, communications and response measures for businesses and properties upstream of Walk Bridge through the construction period.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Traffic, Transit and Parking (EA/EIE Sections 3.3 & 5.3.3)	Temporary impacts to local roadways will include full closure to public access of a portion of Goldstein Place; periodic partial lane closures and full street closures of North Water Street; and partial lane closures of Fort Point Street of about a month and occasional full street closures. Road closures may affect existing routing to parking facilities.	CTDOT will prepare and implement a Transportation Management Plan (TMP) to accommodate the replacement of Walk Bridge and Fort Point Street Bridge in conjunction with the East Avenue Bridge replacement (and associated roadway) project and the Osborne Avenue Bridge replacement project. The TMP will include vehicle, pedestrian, and bicycle detour plans for the stages of the project; temporary bus routes; rail user updates; and construction material haul routes.
	Temporary impacts (including closure) of the Norwalk Parking Authority (NPA) North Water Street parking lot could occur due to a construction easement on the parcel.	CTDOT will work with the City of Norwalk, the NPA, and business community to develop and implement an Alternative/Replacement Parking Plan. The Plan will identify replacement parking due to temporary closures of parking facilities (including the North Water Street Lot), and identify access to available parking facilities unaffected by the project.
Pedestrian and Bicycle Facilities (EA/EIE Sections 3.4 & 5.3.3)	Temporary use of the City's Wastewater Treatment Plant (WWTP) site (Parcel 3/2/3) and construction of an extension of this trail connection along the east river bank will temporarily affect the southernmost terminus of the existing Harbor Loop Trail. Due to the temporary use of the Norwalk Parking Authority site (Parcel 2/19/1), the portion of the Norwalk River Valley Trail (NRVT) adjacent to this parking lot may be closed to the public during construction. North Water Street and its sidewalks can be used by pedestrians and bicyclists.	CTDOT will develop and implement a TMP which will include pedestrian and bicycle detour plans for the stages of the project, including bridge construction.
		CTDOT will restore the existing trails to pre-construction condition following completion of construction.
		CTDOT will include an extension of the Harbor Loop Trail on the east side of the Norwalk River in the Walk Bridge Replacement Project. CTDOT will work with the City of Norwalk, including the Bike-Walk Task Force and Norwalk River Valley Trail Steering Committee, to determine the preferred routing from the proposed north-south connector, as shown on EA/EIE Figure 3-10 or as determined through discussions with project stakeholders. CTDOT is supportive of an extension of the NRVT on the west side of the Norwalk River. The determination of the most appropriate location for this extension of the existing trail on the west side of the river will be made in coordination with the City and the Maritime Aquarium. Implementation specifics will be determined as the project progresses.
Property Acquisition and Displacement (EA/EIE Sections 3.6 & 5.3.4)	A total of eight full-parcel acquisitions will be required for project construction. A total of twelve full- and partial-parcel temporary easements	In accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended, and the Connecticut Uniform Relocation Assistance Act, CTDOT will aid businesses and residents whose properties are acquired by the project, including payment of fair market value for the parcels and appropriate relocation costs.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Property Acquisition and Displacement (EA/EIE Sections 3.6 & 5.3.4)	are currently anticipated for the project, and, of that total, permanent easements are anticipated on three parcels.	CTDOT is guided by Connecticut General Statutes when releasing excess property. Following project completion, any property determined to be in excess of CTDOT's needs will first be offered to other State Agencies in accordance with Connecticut General Statute (CGS) 4b-21. Thereafter, pursuant to CGS 3-14b, the City of Norwalk will have an opportunity to purchase property deemed in excess of the State's needs, prior to being offered to the public. The future use and development of these properties is determined by municipal zoning, the City's Plan of Conservation and Development, permit approvals, and for properties within the coastal zone boundary, municipal coastal site plan review.
Socioeconomics (EA/EIE Sections 3.8 & 5.3.5)	Temporary access impacts will occur to land-based businesses proximate to Walk Bridge and water-based businesses upriver from Walk Bridge over an approximate 40-month construction period. Temporary construction easements will adversely impact public and private parking facilities and facilities and operations of the Maritime Aquarium.	CTDOT will develop and implement Construction Period Coordination Plans to address concerns and develop mitigation plans as design advances and the contractor's construction means and methods are defined. The Plans will include a series of individual plans and strategies. The plans will identify project-specific tasks and mitigation measures to minimize impacts. The CTDOT design and construction team will develop and update these plans working in close coordination with the City of Norwalk, the business community, residents, and other affected parties. Refer to CTDOT Issue Paper: Construction Period Coordination Plans. CTDOT has developed a Communications Management Plan which outlines the objectives of the communications and public involvement efforts for the Walk Bridge Program. Through the project website - www.walkbridgect.com - CTDOT will continue to provide continuous updates to the community on the Walk Bridge Replacement Project and nearby projects. The Communications Management Plan includes strategic approaches for communicating accurate and timely information to all involved agencies and stakeholders, including residents, businesses, visitors, and rail and maritime users. The Plan will be reviewed vigorously and updated as necessary to support transparency and proactively engage stakeholders as design and construction progress. A variety of outreach tools is outlined in the Plan; these communication tools will be used through the duration of the project to facilitate meaningful dialogue.

Environmental Resource	Potential Impacts	Mitigation and Commitments
		CTDOT will develop and implement a Business Coordination Plan to identify the concerns of the business community and address construction-related impacts. By developing and maintaining ongoing communication with local businesses, CTDOT seeks to establish a two-way communication system where the project schedule is communicated, business concerns are identified, and strategies are put in place to minimize disruptions to businesses. Initially, personal interviews will be conducted with businesses in the immediate project construction area to assess existing conditions, including employee and patron parking areas, delivery schedules, hours of operation, and shopping patterns. From these discussions, potential temporary impacts will be determined and mitigation measures will be developed in coordination with businesses in South Norwalk and East Norwalk. Individual plans or strategies may be developed as required.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Socioeconomics (EA/EIE Sections 3.8 & 5.3.5)	Loss of property tax revenue of approximately $91,000 per year over the 4-year construction period will result from parcel acquisitions.	CTDOT does not have the statutory authority to reimburse municipalities for long term tax revenue losses resulting from property acquisitions. However, mitigation measures are incorporated into the project that will benefit the Norwalk community.
Water Quality (EA/EIE Sections 3.9 & 5.3.6)	Temporary impacts will include sediment disturbance due to waterway work and soil exposure due to land-based work.	CTDOT will develop and implement a construction-period water quality control plan, pursuant to the requirements of Section 401 Water Quality Certification and the National Pollutant Discharge Elimination System (NPDES) program.
		CTDOT will prepare and implement a Stormwater Pollution Control Plan (SWPCP) as part of the project's Construction Stormwater General Permit. The SWPCP will identify potential pollutant sources areas and Best Management Practices (BMPs) to be used for erosion and sedimentation control, temporary stormwater management, dust control, and site stabilization.
		CTDOT will comply with the requirements of the Municipal Separate Stormwater Sewer Systems (MS4) General Permit requirements for linear transportation infrastructure.
		CTDOT will identify opportunities to protect and improve water quality as feasible, as it continues to evaluate the types of approach spans in coordination with the City, as the project proceeds into final design, and as the contractor's means and methods of construction are defined. Some examples of BMPs include using marine enclosures for work around piers during construction and demolition; adding protective enclosures for work on the bridge to contain materials that could potentially fall to the water; stabilizing land-based soils; using erosion control measures; removing contaminated sediments from the river; and disposing of sediments following state regulations. Further, CTDOT will utilize its own Environmental Compliance specifications, which list specific BMPs for water pollution control, and address standards for the management and disposal of contaminated and/or hazardous materials.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Tidal Wetlands (EA/EIE Sections 3.10 & 5.3.7)	Indirect temporary impacts will occur to approximately 2,400 sf of vegetated tidal wetlands. Permanent Impacts will occur to approximately 2,500 sf of vegetated tidal wetlands.	CTDOT will provide compensatory mitigation for temporary direct impacts to intertidal and subtidal habitats, and for indirect shading impacts to tidal vegetated wetlands, consisting of in-place restoration or enhancement of temporary impact areas, and restoration of tidal marsh areas that may be temporarily impacted from trestle platform shading. CTDOT will provide compensatory mitigation for permanent impacts to vegetated tidal wetlands through restoration and/or enhancement of wetlands along the Norwalk River dominated by invasive species. Wetland restoration will produce a permanent community benefit.
Freshwater Wetlands (EA/EIE Sections 3.11 & 5.3.7)	Permanent loss of approximate 600-sf wetland will occur.	CTDOT will provide compensatory mitigation for the loss of a state-regulated freshwater wetland through restoration or replacement in-kind; out-of-kind wetland creation; invasive species removal; or any combination of these methods.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Floodplains (EA/EIE Sections 3.12 & 5.3.8)	Temporary impacts will occur to approximately 230,000 square feet of 100-year floodplain due primarily to construction staging and access to the railroad ROW. Permanent impacts will occur to approximately 19,500 sf of 100-year floodplain.	CTDOT will analyze both the temporary and permanent conditions to assess floodplain effects in compliance with Connecticut and Federal Emergency Management Agency (FEMA) floodplain management standards and criteria; if needed, CTDOT will take steps to mitigate effects.
Terrestrial Resources, Species, and Critical Habitats (EA/EIE Sections 3.13 & 5.3.9)	Temporary impacts will occur to terrestrial species due to loss of herbaceous coverage. Minor permanent impacts will occur due to loss of narrow upland habitat patch.	CTDOT will implement BMPs, use construction phasing or sequencing, and comply with seasonal restrictions to avoid impacts to terrestrial resources and habitats.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Aquatic Resources, Species and Critical Habitats (EA/EIE Sections 3.14 & 5.3.10)	Temporary impacts will occur to approximately 7,700 sf of intertidal habitat and approximately 8,400 sf of subtidal habitat. Conversion of approximately 300 sf of intertidal habitat to subtidal habitat and increased depth of subtidal areas will occur due to dredging. Permanent impacts will occur to approximately 900 sf of intertidal habitat and approximately 26,600 sf of subtidal habitat.	CTDOT will minimize impacts to finfish, shellfish, and other aquatic resources through the use of protective measures, including managing turbid water generated inside casing, sheet piles, or cofferdam containments; replacing contaminated native materials cut from the submarine conduits with clean material matching grain size of removed sediments; mechanically removing select existing bridge components; separating and removing sediment-laden water from containment areas; and avoiding construction blasting. CTDOT will provide compensatory mitigation for habitat displacement due to the construction-phase temporary direct impacts to intertidal and subtidal habitats, and for indirect shading impacts to tidal vegetated wetlands, in coordination with the USACE and CTDEEP.
Endangered and Threatened Species (EA/EIE Sections 3.15 & 5.3.11)	Potential temporary disruption of foraging habitat will occur due to work in the water and vegetation clearing.	CTDOT will continue to consult with the U.S. Fish and Wildlife Service (USFWS), USACE, U.S. Environmental Protection Agency (USEPA), National Marine Fisheries Service (NMFS), and CTDEEP through the permitting process, as appropriate, to avoid and/or minimize impacts to endangered and threatened species. On-going coordination with state and federal agencies will ensure minimal disruption of the species. Any identified mitigation resulting from these consultations will be implemented by CTDOT.
		CTDOT will conduct vegetation clearing during the off-season for protected bird species and will monitor the area for the presence of protected bird species during construction.
		CTDOT will incorporate a construction period BMP into the construction specifications to address the potential presence of the state-listed Peregrine Falcon nesting within the project area.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Consistency with CT Coastal Management Act (EA/EIE Section 3.16)	Unavoidable temporary and permanent impacts will occur to tidal wetlands, intertidal and subtidal habitat, coastal access, water-dependent uses, and historic resources.	CTDOT will incorporate mitigation measures for unavoidable impacts and refine the design to minimize impacts to be consistent with the CT Coastal Management Act's policies for the protection of coastal resources and policies on development of those resources. CTDOT will request Coastal Consistency Review as part of its application to CTDEEP for a Structures, Dredge and Fill and Tidal Wetlands Permit for the project.
Water-Dependent Uses (EA/EIE Sections 3.17 & 5.3.12)	Temporary impacts will occur to upstream uses and uses in immediate proximity to the bridge due to navigation restrictions	CTDOT will develop and implement a series of water-dependent use/waterfront access strategies, working in coordination with the affected marine-based businesses, the City of Norwalk, and the Norwalk Harbor Management Commission. The Plan will address temporary impacts to water-based businesses, marina users, rowers, and ferry and vessel operations. Individual plans or strategies may be developed with owners and water-users.

Environmental Resource	Potential Impacts	Mitigation and Commitments
	Temporary relocation of the Sheffield Ferry and Maritime Aquarium vessel operations will be required, as the current docking facilities will be temporarily removed due to anticipated project construction activities.	CTDOT is working with the Norwalk Seaport Association and the Maritime Aquarium to aid in relocating their respective vessels in accordance with the Uniform Relocation and Real Property Acquisition Policies Act of 1970 (Uniform Act).
	Permanent impact will occur through parcel acquisition of private marina.	Regarding the sale of properties with existing water-dependent uses, CTDOT will market the excess property indicating the highest priority and preference for water-dependent use of the site. With approval from the Commissioner of the Department of Energy and Environmental Protection, CTDOT will select the highest bid that best demonstrates an integrated, quality, water-dependent use. Water-dependent uses include, but are not limited to: marinas, recreational and commercial fishing and boating facilities, finfish and shellfish processing plants, waterfront dock and port facilities, shipyard and boat building facilities, and water-based recreational uses.
Parklands, Public Recreation, and Community Facilities (EA/EIE Sections 3.18 & 5.3.13)	Temporary impacts that will occur to the Norwalk River Valley Trail (NRVT) on the east side and west side of the Norwalk River. Permanent impacts will occur to City parks due to the creation and/or restoration of wetlands.	CTDOT will restore the existing trails to pre-construction condition following completion of construction. CTDOT's proposed wetland restoration will be a positive permanent impact: it will enhance the City's parks and waterfront and provide a permanent benefit to the community. The tidal wetland restoration that may be located adjacent to or within the boundaries of Oyster Shell Park is identified in the City of Norwalk's Oyster Shell Park Master Plan as part of planned waterfront improvements.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Parklands, Public Recreation, and Community Facilities (EA/EIE Sections 3.18 & 5.3.13)	Construction will impact the Maritime Aquarium, including animal exhibits and the IMAX Theatre. CTDOT is coordinating with the Maritime Aquarium and the City regarding the temporary and/or permanent nature of these impacts.	CTDOT is developing a specific coordination plan with the Maritime Aquarium. CTDOT is working with the City of Norwalk and the Aquarium to develop a plan to identify and address the impacts of the project upon the Aquarium's outdoor and indoor exhibits and its terrestrial and aquatic animals. CTDOT will compensate the City of Norwalk for the property rights to be acquired. In connection therewith, CTDOT will provide the City of Norwalk and/or the Aquarium the assistance necessary to relocate the animals affected by the acquisition.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Visual Resources (EA/EIE Sections 3.19 & 5.3.14)	Temporary impacts will occur due to construction staging, including use of temporary trestles and barges in the water. Permanent altered visual setting will occur due to loss of historic resources, and potential altered visual effect could occur due to new bridge in an historic setting.	CTDOT has initiated meetings with the City of Norwalk's Design Advisory Committee to review design and solicit feedback on those design elements that will contribute to the aesthetics of the replacement bridge, including (but not limited to) façade treatments, color, and landscaping. CTDOT has committed to working with the Design Advisory Committee, as well as local historic stakeholders, on the design elements of the bridge.
Air Quality (EA/EIE Sections 3.20 & 5.3.15)	Temporary minor impacts will occur from diesel equipment, fugitive dust.	CTDOT will develop and implement a construction-period air quality/dust control plan. It is anticipated that construction-related dust will be primarily controlled by using BMPs, and will build on the air quality/dust control measures identified for consideration in the EA/EIE (Section 5.3.15).
Noise and Vibration (EA/EIE Sections 3.21 & 5.3.16)	Temporary impacts will occur due to daytime and night-time noise proximate to the project site.	CTDOT will develop and implement a construction-period noise and vibration control plan to address potential impacts of land-based and water-based noise. It is anticipated that the construction noise and vibration control plan will build on the noise and vibration control measures identified for consideration in the EA/EIE (Section 5.3.16).
		CTDOT is developing a specific coordination plan with the Maritime Aquarium which they will work with the Aquarium to implement. CTDOT is working with the City of Norwalk and the Aquarium to develop a plan to identify and address the impacts of the project upon the Aquarium's outdoor and indoor exhibits and its terrestrial and aquatic animals.
		CTDOT will coordinate the need for vibration mitigation measures with the NMFS, including addressing potential vibration impacts on fish living/migrating in the Norwalk River.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Noise and Vibration (EA/EIE Sections 3.21 & 5.3.16)	Potential temporary impacts of ground-borne vibration to affect nearby buildings, including the Maritime Aquarium and historic structures that may not have the same physical resistance to vibration as modern buildings.	CTDOT will develop and implement an Historic Building Protection Plan in coordination with the Connecticut State Historic Preservation Office (CTSHPO) to minimize the effects of construction-period vibration upon nearby historic buildings. The historic buildings to be included in the Plan consist of the Interlocking Tower (South Norwalk Switch Tower Museum) and historic buildings on the north side of Washington Street in the South Main and Washington Streets Historic District, the Former Norwalk Lock Company, the Former Norwalk Iron Works, the circa 1910 commercial buildings at 68 Water Street, and the buildings that comprise the potentially eligible Liberty Square Historic District. The Plan will be based on FTA's vibration threshold criteria, and will consist of multiple elements, including (but not limited to) conducting pre-construction inspection of historic buildings, developing and implementing a vibration monitoring program, and conducting post-construction surveys of historic buildings. The plan will include protective measures to be implemented if monitoring indicates the potential for damage to historic buildings. CTDOT will prepare a draft technical memorandum documenting the results of the Plan's implementation and will submit it to CTSHPO and FTA. The final technical memorandum will be submitted to CTSHPO for permanent archiving and public accessibility.
Cultural Resources (EA/EIE Sections 3.22 & 5.3.17)	Adverse effects will occur due to demolition of National Register-listed Walk Bridge and Fort Point Street Bridge; and historic stone abutment retaining walls, high towers. and catenary support structures.	CTDOT has developed mitigation measures for impacts to historic resources, working in coordination with FTA, CTSHPO, and local historic stakeholders. CTDOT has determined that to the maximum amount practicable, mitigation measures for the loss of the landmark structure will be public in their scope and availability to the Norwalk community, particularly the South Norwalk and East Norwalk neighborhoods. The mitigation measures are memorialized in a Memorandum of Agreement (MOA) among FTA, CTSHPO and CTDOT (as signatory parties) and local historic stakeholders (as concurring parties), pursuant to Section 106 of the National Historic Preservation Act. Refer to Appendix 2-2.
		Prior to demolition, CTDOT will contact the Historic American Engineering Record (HAER) for advice as to the level of documentation that would be appropriate for recording the Walk Bridge. CTDOT will retain a qualified consultant to prepare the documentation of the Walk Bridge as specified in HAER's response. CTDOT will submit the documentation to FTA and CTSHPO for review, revise the documentation according to any comments, and submit the revised documentation to HAER and provide CTSHPO with two copies of the documentation upon completion.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Cultural Resources (EA/EIE Sections 3.22 & 5.3.17)	Adverse effects will occur due to demolition of National Register-listed Walk Bridge and Fort Point Street Bridge; and historic stone abutment retaining walls, high towers. and catenary support structures.	Prior to demolition, CTDOT will determine whether the documentation entitled "New Haven Railroad Catenary System," prepared by Historical Technologies in 2000 (the 2000 Documentation), adequately represents the catenary structures to be demolished as part of the project. If the catenary structures that were photographed and described in the 2000 Documentation are essentially identical to those proposed for demolition, CTDOT will notify CTSHPO of this determination and no further documentation will be necessary. If the catenary structures to be demolished are unique and not adequately represented in the 2000 Documentation, CTDOT will prepare additional written and photographic documentation of the catenary structures to the professional standards of CTSHPO. CTDOT will submit the documentation to the FTA and CTSHPO for review, revise the documentation according to any comments, and submit the revised documentation to CTSHPO for permanent archiving and public accessibility.
		CTDOT will prepare written and photographic documentation of other historic structures on the New Haven Line, within the limits of the project, to the professional standards of CTSHPO. The documentation will address the high towers, stone retaining walls, interlocking tower (South Norwalk Switch Tower Museum), Fort Point Street Railroad Bridge, and any historic trackside features such as mileposts. The documentation will also provide context views that incorporate the former Norwalk Lock Company buildings, the former Norwalk Iron Works buildings, and the buildings of the South Main and Washington Streets Historic District. CTDOT will submit the documentation to the FTA and CTSHPO for review, revise the documentation according to any comments, and submit the revised documentation to CTSHPO for permanent archiving and public accessibility.
		CTDOT will attempt to reuse/repurpose the stone masonry from the existing bridge abutments that will be demolished in the construction of the replacement bridge. If CTDOT determines that it is not feasible to reuse/repurpose the stone, CTDOT will notify FTA and CTSHPO of the reason(s) that reuse would not be feasible, and CTDOT's obligation to reuse the stone will cease. Subsequently, CTDOT will attempt to solicit interest in obtaining the stone masonry to be used for public education purposes, from local institutions identified in the MOA. If it is feasible to do so, CTDOT will use its best efforts to ensure that the salvaged material is removed in as intact a condition as possible. If CTDOT determines it is not feasible to salvage the stone masonry, CTDOT will notify FTA and CTSHPO of the reason(s) that salvaging the material would not be feasible and CTDOT's obligation to salvage the material will cease.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Cultural Resources (EA/EIE Sections 3.22 & 5.3.17)	Adverse effects will occur due to demolition of National Register-listed Walk Bridge and Fort Point Street Bridge; and historic stone abutment retaining walls, high towers. and catenary support structures.	CTDOT will attempt to solicit interest in obtaining salvaged material from the project, such as the catenary structures, to be used for public education purposes, from the institutions listed in the MOA. If it is feasible to do so, CTDOT will use its best efforts to ensure that the salvaged material is removed in as intact a condition as possible. If CTDOT determines it is not feasible to salvage the material, CTDOT will notify FTA and CTSHPO of the reason(s) that salvaging the material would not be feasible and CTDOT's obligation to salvage the material will cease.
		CTDOT will develop a maximum of two (2) exhibits and/or education programs for institutions and educators in the community, including the Maritime Aquarium. A maximum of $450,000 will be allocated to the development of the two (2) exhibits and/or education programs. CTDOT will solicit letters of interest (including scope of work and fee), select the institution(s) to develop the exhibits/education program(s), and submit the scope of work to FTA and CTSHPO for review. Following consultation with and approval by FTA and CTSHPO, CTDOT will oversee the development and implementation of the exhibits and/or education programs. One exhibit will be focused on historic and current movable bridge engineering. The exhibit will include information about the extant WALK Bridge, earlier rail bridges at this location, and the new lift bridge. The public will learn about bridge operation, construction, and function. Hands-on Science, Technology, Engineering, and Math (STEM) educational components will be developed and distributed to local schools to be used in conjunction with school trips to the Maritime Aquarium. Materials will also be provided to the Aquarium to share with and educate visitors. A second exhibit will focus on the history of the railroad in the City of Norwalk, especially the WALK Bridge and the archaeological work conducted as part of the project. Photographs, documents, and other materials will be compiled to create the exhibit narrative and visuals. An exhibit will be developed that could be accommodated in any of the historical museums in the City. Associated classroom information will be developed, as well as electronic media that can be shared online with the public.
		CTDOT will provide non-federal resources for the restoration of the original iron fencing, gates, and associated masonry located in Mathews Park at the original entrance to the Lockwood-Mathews Mansion on West Avenue in Norwalk. CTDOT will provide a maximum of $2,500,000 for the restoration. CTDOT will work with the City of Norwalk, the Norwalk Historical Commission, and the Lockwood Mathews Mansion Museum to develop the scope for the restoration of the original fencing, gates, and associated masonry.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Cultural Resources (EA/EIE Sections 3.22 & 5.3.17)	Adverse effects will occur due to demolition of National Register-listed Walk Bridge and Fort Point Street Bridge; and historic stone abutment retaining walls, high towers. and catenary support structures.	CTDOT will prepare documentation for listing the potentially eligible Liberty Square Historic District on the National Register of Historic Places. The Liberty Square Historic District to be listed consists of a row of late 19th-century and early 20th-century commercial buildings (195-201 Liberty Square, 203 Liberty Square, 205 Liberty Square, 207 Liberty Square, 209 Liberty Square, 211 Liberty Square, 213 Liberty Square, and 215 Liberty Square). CTDOT will submit the documentation to the FTA and CTSHPO for review, revise the documentation according to any comments, and submit the revised documentation to CTSHPO for submittal to the National Park Service in accordance with the requirements of the National Register of Historic Places. The documentation will be available for archiving and public accessibility.
		CTDOT will prepare permanent interpretative panels for outdoor display in the city of Norwalk that will be available for viewing by the public. It is anticipated that the subject of the panels will be related to the history of Walk Bridge, the railroad, railroad engineering and transportation history in Connecticut. CTDOT will consult with the City of Norwalk and the local historic stakeholders regarding the content and locations of the interpretative panels. CTDOT will prepare and install a maximum of ten (10) permanent interpretive panels.
		CTDOT will share Thirty (30), sixty (60), and ninety (90) percent design plans with CTSHPO and concurring parties who will have a thirty (30) day comment period in which to submit their comments to CTDOT. CTDOT will consider these comments as design further progresses.
	Potential archaeological sensitivity for pre-colonial/contact and historic periods exists on many of the construction parcels, requiring subsurface testing and/or monitoring.	CTDOT will implement an Archaeological Treatment Plan as attached to the MOA in areas with potential archaeological sensitivity. If it is determined that archaeological properties that are eligible for listing in the NRHP are present, CTDOT will consult with FTA and CTSHPO regarding measures to avoid affecting the properties or to mitigate adverse effects on the properties and will implement the agreed-upon measures.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Title VI and Environmental Justice (EA/EIE Sections 3.26 & 5.3.21)	No disproportionate temporary or permanent impacts will occur.	As part of its overall Communications Management Plan (included in the Project Management Plan), CTDOT developed an EJ and Title VI Outreach Plan to ensure that EJ and Title VI populations have equal access to information about the project. CTDOT has committed to implementing EJ and Title VI outreach for each major Walk Bridge Program event so these populations have equal access to information about the Program. CTDOT coordinated with the City of Norwalk to identify community organizations representing EJ communities and methods for outreach to EJ and LEP groups. Outreach methods included translating communications materials in appropriate languages (Spanish and Haitian Creole); advertising in multi-language publications (*El Sol News* and *The Haitian Voice*); and conducting grassroots outreach by establishing partnerships in low-income neighborhoods, including community organizations, neighborhood groups, and small neighborhood businesses. Community organizations with which CTDOT has initiated and/or established relationships include (but are not limited to) the South Norwalk Community Center, Open Door Shelter, Norwalk Senior Center, Norwalk NAACP, Norwalk Housing Authority, Make the Road CT, and Greater Norwalk Hispanic Chamber of Commerce. Outreach activities conducted for the EA/EIE public review period, the EA/EIE public hearing, and public meetings held after the public hearing included translated advertising, translated materials, and advance phone calls and emails to community organizations. On an ongoing basis, CTDOT tracks and addresses all concerns and issues voiced from EJ and Title VI stakeholders. For future Walk Bridge public meetings and outreach efforts, CTDOT has committed to: conducting phone calls, emails, and check-ins with community groups prior to meetings; offering translation services at all public meetings, and translating meeting materials and advertisements. Google Translate (into any language) is enabled on the Walk Bridge Program website (www.walkbridgect.com).
Secondary & Cumulative Impacts (EA/EIE Section 3.27)	Secondary impacts will occur due to relocation of the Eversource powerlines, currently on high towers abutting the existing bridge.	Eversource Energy, LLC, the utility owner, is responsible for the relocation of the powerlines and will be obtaining NEPA review (if required pursuant to the Federal Energy Regulatory Commission) and permits, including identifying impacts and mitigation measures. CTDOT is coordinating with Eversource Energy on the timing of its replacement project.

Environmental Resource	Potential Impacts	Mitigation and Commitments
Secondary & Cumulative Impacts (EA/EIE Section 3.27)	There are multiple CTDOT-sponsored and local municipal and private projects planned for construction in the greater Norwalk area over the next six years (prior to and during the Walk Bridge Replacement Project).	CTDOT is preparing a Regional Transportation Management Plan (Regional TMP) to address the potential cumulative impacts of these projects and is committed to implementing its recommendations. The Regional TMP, which will include Norwalk and surrounding communities, will address potential traffic impacts of the multiple projects, facilitate comprehensive public outreach efforts, and provide coordination with stakeholder agencies in the region. An early Regional TMP has been created that assesses viable mitigation strategies, prioritizes these based on the lead time required to implement them, identifies the responsible parties, and establishes coordination protocols for inter-agency coordination. CTDOT initiated several Regional TMP tools for implementation in 2017, including portable data collection units, Regional TMP coordination, website rollout, and public involvement strategies. CTDOT will continue to work with the City of Norwalk to determine appropriate traffic mitigation strategies for various stages of individual projects, as well as for projects with anticipated substantial impacts.
	Cumulative impacts will occur due to loss of a tangible example of historic movable bridge technology in Connecticut, and a bridge on the NRHP-listed Movable Railroad Bridges on the Northeast Corridor in Connecticut Thematic Resource.	CTDOT has identified mitigation measures for the loss of the historic bridge and other resources which could address the historic bridge technology in Connecticut. Mitigation measures include developing exhibits that are historic- and/or STEM-related; obtaining salvaged material from the project to be used for public education purposes; and creating permanent interpretative panels related to the history of Walk Bridge, the railroad, and railroad engineering and transportation history in Connecticut. (Refer to Cultural Resources Mitigation Measures and Commitments).

Appendix 2-2 Section 106 Memorandum of Agreement

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

WHEREAS, the Connecticut Department of Transportation (CTDOT), an agency of the State of Connecticut, proposes the replacement of the Walk Bridge, also known as the Norwalk River Railroad Bridge and State Bridge No. 04288R, across the Norwalk River in Norwalk, Connecticut (the Undertaking); and

WHEREAS, the U.S. Department of Transportation, Federal Transit Administration (FTA) 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) (NHPA) and its implementing regulations, 36 C.F.R. Part 800, et. seq.; and

WHEREAS, the Undertaking is not a Tier 2 Project in accordance with the Programmatic Agreement regarding the Northeast Corridor (NEC) FUTURE Investment Program and is an independent project on the NEC; and

WHEREAS, CTDOT has prepared technical reports, *Historic Resources Evaluation Report, Walk Bridge Replacement Project* August 2016 and *Archaeological Sensitivity Assessment, Walk Bridge Replacement Project* August 2016 (collectively, the Technical Reports) for historic above-ground resources and archaeological resources potentially affected by the Undertaking, which Technical Reports have been reviewed and approved by FTA and the Connecticut State Historic Preservation Office (CTSHPO); and

WHEREAS, CTDOT has prepared an Archaeological Treatment Plan (Appendix A) to address areas of archaeological sensitivity identified in the archaeological technical reports, as well as areas of sensitivity that could be identified as part of ongoing actions associated with the Undertaking, which plan has been reviewed and approved by FTA and CTSHPO and has been incorporated into this Memorandum of Agreement (MOA) as Appendix A; and

WHEREAS, this Agreement was developed with appropriate public involvement (pursuant to 36 CFR 800.2[d] and 800.6[a]) both coordinated with the scoping, public review and public hearings conducted to comply with NEPA and its implementing regulations and through public meetings to comply with NHPA and its implementing regulations; and in consultation with the CTSHPO, the Advisory Council on Historic Preservation and (pursuant to 36 CFR 800.2[d] and 800.6[a]) additional invited Consulting Parties; and

WHEREAS, the public has had an opportunity to comment on the Undertaking and the findings set forth in the Undertaking's associated Technical Reports; and

WHEREAS, the Norwalk Historical Commission, the Norwalk Historical Society, the Norwalk Preservation Trust, and the SONO Switch Tower Museum have participated in the consultation process pursuant to 36 C.F.R. Part 800, have been invited to concur in this MOA, and will continue to be consulted in the implementation of the MOA; and

WHEREAS, the Tribal Historic Preservation Officers (THPOs) of the Mashantucket Pequot Tribal Nation and the Mohegan Tribe of Indians of Connecticut have participated in the consultation process pursuant to 36 C.F.R. Part 800, have been invited to concur in this MOA;

WHEREAS, FTA in consultation with CTSHPO has defined the Area of Potential Effect of the Undertaking as shown on the attached map (Appendix B); and

WHEREAS, FTA, in consultation with CTSHPO, has (i) determined that the Undertaking will have unavoidable adverse effects pursuant to 36 C.F.R. Part 800.5 to properties that are listed in or eligible for listing in the National Register of Historic Places (NRHP) and are enumerated in the attached table (Appendix C) (collectively, the Historic Properties); and

WHEREAS, FTA has notified the Advisory Council on Historic Preservation (the Council) of the adverse effects on the Historic Properties that were identified in the Technical Reports and the Council has elected not to participate in consultation; and

NOW, THEREFORE, FTA, 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:

STIPULATIONS:

FTA will ensure that the terms of this MOA are carried out and will require, as a condition of any approval of federal funding for the Undertaking, adherence to the stipulations set forth herein.

1. Prior to demolition, CTDOT shall contact the Historic American Engineering Record (HAER) for advice as to the level of documentation that would be appropriate for recording the Walk Bridge. CTDOT shall retain a qualified consultant to prepare the documentation of the Walk Bridge as specified in HAER's response. CTDOT shall submit the documentation to FTA and CTSHPO for review and shall revise the documentation according to any comments. CTDOT shall submit the revised documentation to HAER and provide CTSHPO with two copies of the documentation upon completion.

2. When track access is granted to view individual catenary structures and prior to demolition, CTDOT shall determine whether the documentation entitled "New Haven Railroad Catenary System," prepared by Historical Technologies in 2000 (the 2000 Documentation), adequately represents the catenary structures to be demolished as part of the Undertaking. If the catenary structures that were photographed and described in the 2000 Documentation are essentially identical to those proposed for demolition, CTDOT shall notify CTSHPO of this determination and no further documentation will be necessary. If the catenary structures to be demolished are unique and not adequately represented in the 2000 Documentation, CTDOT will prepare additional written and photographic documentation of the catenary structures to the professional standards of CTSHPO. CTDOT shall submit the documentation to the FTA and CTSHPO for review and revise the documentation according to any comments. CTDOT shall submit the revised documentation to CTSHPO for permanent archiving and public accessibility.

3. CTDOT shall prepare written and photographic documentation of other historic structures on the New Haven Line, within the limits of the Undertaking, to the professional standards of CTSHPO. The documentation will address the high towers, stone retaining walls, interlocking tower (South Norwalk Switch Tower Museum), Fort Point Street Railroad Bridge, and any historic trackside features such as mileposts. The documentation will also provide context views that incorporate the former Norwalk Lock Company buildings, the former Norwalk Iron Works buildings, and the buildings of the South Main and Washington Streets Historic District. CTDOT shall submit the documentation to the FTA and CTSHPO for review and revise the documentation according to any comments. Upon completion, CTDOT shall submit the revised documentation to CTSHPO for permanent archiving and public accessibility.

4. CTDOT shall implement the Archaeological Treatment Plan set forth in Appendix A attached to this MOA and hereby incorporated herein in its entirety. If it is determined that archaeological properties that are eligible for listing in the NRHP are present, CTDOT shall consult with FTA and CTSHPO regarding measures to avoid affecting the properties or to mitigate adverse effects on the properties and shall implement the agreed-upon measures.

5. CTDOT shall attempt to solicit interest in obtaining salvaged material from the Undertaking, such as the catenary structures, to be used for public education purposes, from the institutions listed in Appendix D. If it is feasible to do so, CTDOT shall use its best efforts to ensure that the salvaged material is removed in as intact a condition as possible. The recipient shall be required to accept the salvage material in its "AS-IS" condition and assume all liability, costs and expenses related to the salvaged material, including, without limitation, contamination, and storage. If CTDOT determines it is not feasible to salvage the material, CTDOT shall notify FTA and CTSHPO of the reason(s) that salvaging the material would not be feasible and CTDOT's obligation to salvage the material shall cease.

6. CTDOT shall attempt to reuse/repurpose the stone masonry from the existing bridge abutments that will be demolished in the construction of the replacement bridge. If CTDOT determines that it is not feasible to reuse/repurpose the stone, CTDOT shall notify FTA and CTSHPO of the reason(s) that reuse would not be feasible, and CTDOT's obligation to reuse the stone shall cease. Subsequently, CTDOT shall attempt to solicit interest in obtaining the stone masonry to be used for public education purposes, from the institutions listed in Appendix D. If it is feasible to do so, CTDOT shall use its best efforts to ensure that the salvaged material is removed in as intact a condition as possible. The recipient shall be required to accept the salvage material in its "AS-IS" condition and assume all liability, costs and expenses related to the salvaged material, including, without limitation, contamination, and storage. If CTDOT determines it is not feasible to salvage the stone masonry, CTDOT shall notify FTA and CTSHPO of the reason(s) that salvaging the material would not be feasible and CTDOT's obligation to salvage the material shall cease.

7. CTDOT shall develop an Historic Building Protection Plan in coordination with CTSHPO to minimize the effects of construction-period vibration upon nearby historic buildings. The historic buildings to be included in the Plan consist of the Interlocking Tower (South Norwalk Switch Tower Museum) and historic buildings on the north side of Washington Street in the South Main and Washington Streets Historic District, the Former Norwalk Lock Company, the Former Norwalk Iron Works, the circa 1910 commercial buildings at 68 Water Street, and the buildings that comprise the potentially eligible Liberty Square Historic District. The Plan shall be based on FTA's vibration threshold criteria, and shall consist of multiple elements, including (but not limited to) conducting pre-construction inspection of historic buildings, developing and implementing a vibration monitoring program, and conducting post-construction surveys of historic buildings. The plan shall include protective measures to be implemented if monitoring indicates the potential for damage to historic buildings. CTDOT shall prepare a draft technical memorandum documenting the results of the Plan's implementation and shall submit it to CTSHPO and FTA. The final technical memorandum shall be submitted to CTSHPO for permanent archiving and public accessibility.

8. CTDOT shall develop a maximum of two (2) exhibits and/or education programs for institutions and educators in the community, including the Maritime Aquarium. A maximum of $450,000 will be allocated to the development of the two (2) exhibits and/or education programs. CTDOT shall solicit letters of interest (including scope of work and fee), select the institution(s) to develop the exhibits/education program(s), and submit the scope of work to FTA and CTSHPO for review. Following consultation with and approval by FTA and CTSHPO, CTDOT shall oversee the development and implementation of the exhibits and/or education programs.

- One exhibit will be focused on historic and current movable bridge engineering. The exhibit will include information about the extant WALK Bridge, earlier rail bridges at this location, and the new lift bridge. The public will learn about bridge operation, construction, and function. Hands-on Science, Technology, Engineering, and Math (STEM) educational components will be developed and distributed to local schools to be used in conjunction with school trips to the Maritime Aquarium. Materials will also be provided to the Aquarium to share with and educate visitors.
- A second exhibit will focus on the history of the railroad in the City of Norwalk, especially the WALK Bridge and the archaeological work conducted as part of the project. Photographs, documents, and other materials will be compiled to create the exhibit narrative and visuals. An exhibit will be developed that could be accommodated in any of the historical museums in the City. Associated classroom information will be developed, as well as electronic media that can be shared online with the public.

9. CTDOT shall provide non-federal resources for the restoration of the original iron fencing, gates, and associated masonry located in Mathews Park at the original entrance to the Lockwood-Mathews Mansion on West Avenue in Norwalk. CTDOT shall provide a maximum of $2,500,000 for the restoration. CTDOT will work with the City of Norwalk, the Norwalk Historical Commission, and the Lockwood Mathews Mansion Museum to develop the scope, including the maximum funding amount, for the restoration of the original fencing, gates, and associated masonry.

10. CTDOT shall prepare documentation for listing the potentially eligible Liberty Square Historic District on the National Register of Historic Places. The Liberty Square Historic District to be listed consists of a row of late 19th-century and early 20th-century commercial buildings (195-201 Liberty Square, 203 Liberty Square, 205 Liberty Square, 207 Liberty Square, 209 Liberty Square, 211 Liberty Square, 213 Liberty Square, and 215 Liberty Square). CTDOT shall submit the documentation to the FTA and CTSHPO for review and revise the documentation according to any comments. Upon completion, CTDOT shall submit the revised documentation to CTSHPO for submittal to the National Park Service in accordance with the requirements of the National Register of Historic Places. The documentation shall be available for permanent archiving and public accessibility.

11. CTDOT shall prepare permanent interpretative panels for outdoor display in the city of Norwalk that will be available for viewing by the public. It is anticipated that the subject of the panels will be related to the history of Walk Bridge, the railroad, railroad engineering and transportation history in Connecticut. CTDOT shall consult with the City of Norwalk and the local historic stakeholders regarding the content and locations of the interpretative panels. CTDOT shall prepare and install a maximum of ten (10) permanent interpretive panels.

11. CTDOT will share Thirty (30), sixty (60), and ninety (90) percent design plans with CTSHPO and concurring parties who will have a thirty (30) day comment period in which to submit their comments to CTDOT. CTDOT will consider these comments as design further progresses.

12. Administrative Stipulations

A. Dispute Resolution

If at any time during the implementation of this MOA, CTDOT or CTSHPO objects to any action proposed or the manner in which the terms of this MOA are implemented and cannot resolve the issue between them, both parties shall immediately notify and consult with FTA in order to resolve the objection. If, within thirty (30) days of such written notice, FTA determines that such objection(s) cannot be resolved, FTA will forward all documentation relevant to the dispute to the Council. Within thirty (30)

days after receipt of all pertinent documentation, the Council will provide FTA with recommendations, which FTA will take into account in reaching a final decision regarding the dispute.

If the Council does not provide comments regarding the dispute within thirty (30) days after receipt of adequate documentation, FTA may render a decision regarding the dispute. In reaching its decision, FTA will take into account all comments regarding the dispute from the parties to this MOA.

Any recommendations or comments provided by the Council will be understood to pertain only to the subject of the dispute; FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remains unchanged.

FTA will notify all parties of its decision in writing before implementation of that portion of the Undertaking that was subject to dispute. FTA's decision will be final.

B. Amendments and Noncompliance

If any signatory to this MOA determines that its terms will not or cannot be carried out or that an amendment to its terms must be made, that party shall immediately consult with the other signatories to develop an amendment to this MOA pursuant to 36 C.F.R. §§ 800.6(c)(7) and 800.6(c)(8). The amendment will be effective on the date a copy signed by all of the original signatories is filed with the Council. If the signatories cannot agree to appropriate terms to amend this MOA, any signatory may terminate this MOA in accordance with Stipulation 12.C.

C. Termination

If this MOA is not amended following the consultation set out in Stipulation 12.B, it may be terminated by any signatory. Within thirty (30) days following termination, FTA shall notify the signatories if it will initiate consultation to execute a new MOA with the signatories under 36 C.F.R. § 800.6(c)(1) or request the comments of the Council under 36 C.F.R. § 800.7(a) and proceed accordingly.

D. Duration

If the terms of this MOA have not been implemented within fifteen (15) years of its execution, this MOA shall be considered null and void. In such event, FTA shall so notify the parties to this MOA and, if FTA chooses to continue with the Undertaking, shall reinitiate review of the Undertaking in accordance with 36 C.F.R. Part 800, et. seq.

E. Timely Review

Materials provided by CTDOT to FTA and CTSHPO under Stipulations 1 through 4 shall be reviewed in a timely fashion by FTA and CTSHPO. FTA and CTSHPO will provide CTDOT with requests for revision and any other comments within thirty (30) days of receiving a draft document. CTDOT will revise the materials accordingly and re-submit to FTA and CTSHPO for approval. Disputes regarding revisions shall be resolved as in Stipulation 12.A. If no response is received within the thirty (30) day period, the document will be considered to be approved by the non-responding party.

F. Unanticipated Discoveries

After the execution of this MOA if previously unidentified properties other than those discussed in this MOA are discovered that are eligible for the NRHP or that unanticipated effects on historic properties are found during the implementation of this MOA, CTDOT shall notify FTA, CTSHPO and appropriate concurring parties, and FTA shall follow the procedure specified in 36 C.F.R. 800.13.

G. Execution

Execution of this MOA by FTA, CTDOT, and CTSHPO and implementation of its terms are evidence that FTA has taken into account the effects of the Undertaking on the Historic Properties.

H. Counterparts

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

I. Monitoring and Reporting

Each year following the execution of this MOA until it expires, is terminated, or the Stipulations have been fulfilled, CTDOT, on behalf of FTA, shall provide all parties and signatories to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include, as applicable, status of mitigation activities, actions and accomplishments over the past year, any scheduling changes proposed, any problems encountered, and any disputes and/or objections received regarding CTDOT and FTA's efforts to carry out the terms of this MOA.

SIGNATORY PAGE

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

Federal Transit Administration

By: Mary Beth Mello Date: 5/25/17
Mary Beth Mello, Regional Administrator, Region 1

Concur: Charles J Dyer Date: 5/25/2017
Charles J. Dyer, Regional Counsel

SIGNATORY PAGE

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WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
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Connecticut Department of Transportation

By: Thomas J. Maziarz Date: 5-15-2017
Thomas J. Maziarz, Bureau Chief, Bureau of Policy and Planning

SIGNATORY PAGE

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WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

Connecticut State Historic Preservation Officer

By: _____ Date: 5/16/17
Catherine Labadia, Deputy State Historic Preservation Officer

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
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THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

Tribal Historic Preservation Officer, Mashantucket Pequot Tribal Nation

By: _____ Date: _____
Marissa Turnbull, Tribal Historic Preservation Officer

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
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WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

Tribal Historic Preservation Officer, Mohegan Tribe of Indians of Connecticut

By: _____ Date: _____
James Quinn, Tribal Historic Preservation Officer

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
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THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
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Norwalk Historical Commission

By: _____ Date: 5/23/17
David Westmoreland, Chairman

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
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Norwalk Historical Society

By: Diane M. Jellerette
Diane Jellerette, Executive Director

Date: May 22, 2017

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

Norwalk Preservation Trust

By: _____ Date: 5/19/2017
Tod Bryant, President

CONCURRING PARTY

MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION,
AND
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

SONO Switch Tower Museum

By: Anthony White
Anthony White, President

Date: 5/15/2017

MEMORANDUM OF AGREEMENT

REGARDING THE

WALK BRIDGE REPLACEMENT PROJECT

NORWALK, CONNECTICUT

STATE PROJECT 301-176

APPENDIX A

ARCHAEOLOGICAL TREATMENT PLAN

I. INTRODUCTION

The Connecticut Department of Transportation (CTDOT) proposes the replacement of the Norwalk River Railroad Bridge (State Bridge 04288R), also known as the Walk Bridge, across the Norwalk River in Norwalk, Connecticut (the Undertaking). The plans for the Undertaking involve numerous actions that may affect buried archaeological sites which may be eligible for listing in the National Register of Historic Places (NRHP). The actions include the acquisition of at least twenty (20) parcels for use as construction easements, access and staging areas, as well as shoreline, intertidal and underwater actions related to the erection of new bridge footings, submarine electric cables, and construction-related structures.

An archaeological sensitivity assessment (Phase IA) was undertaken of the terrestrial, intertidal and underwater areas that will be affected by the Undertaking. The assessment included review of historic maps, archaeological site files, local histories, census records, environmental data and bathymetric data, as well as a walkover survey. Twenty (20) terrestrial parcels were assessed as having the potential for containing intact buried archaeological remains. Most of the terrestrial parcels are sensitive for historic-period resources based on the land-use history and 19th century development on both sides of the Norwalk River. However, the survival of pre-colonial Native American site remains cannot be ruled out, because substantial portions of the project area were formerly marshlands, inclusive of a mapped "ancient Indian fort" within a current marina formed by filling in the marsh around the fort site. Intertidal and underwater portions of the Area of Potential Effect (APE), outside of the deep regularly-dredged channel, were also assessed as having archaeological sensitivity for pre-colonial Native American sites.

A combination of geoprobe investigation, machine-assisted and manual testing, and archaeological monitoring is recommended for terrestrial parcels to determine whether potentially significant archaeological resources have survived. A combination of vibracores and hand cores is recommended to determine whether potentially significant submerged archaeological resources have survived in intertidal and underwater portions of the APE.

Additional evaluation of areas of archaeological sensitivity will occur as outlined below.

II. EVALUATION OF AREAS OF ARCHAEOLOGICAL POTENTIAL

A. Further Analysis of Archaeological Sensitivity

Additional geotechnical information may become available that indicates that areas designated as archaeologically sensitive in the project-wide archaeological sensitivity report have little or no potential for containing intact archaeological resources. CTDOT shall notify the U.S. Department of Transportation, Federal Transit Administration (FTA) and the Connecticut State Historic Preservation Office (CTSHPO) of these findings. No further archaeological investigations will be undertaken for these areas.

B. Standards for Archaeological Documentation

All archaeological survey, assessment, documentation and mitigation will be conducted according to the CTSHPO's *Environmental Review Primer for Connecticut's Archaeological Resources* and the United States Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation.*

C. Assessment of Additional Sensitive Areas

Additional areas of archaeological sensitivity may also be identified as part of ongoing actions associated with the Undertaking. Specific areas of the Undertaking impact identified after completion of the Undertaking-wide archaeological sensitivity assessment survey will be evaluated for their potential to contain NRHP-eligible subsurface terrestrial, intertidal and underwater resources. The assessment survey for additional areas will include documentary research, walkover survey, and evaluation of historical, environmental and bathymetric data. Sensitive areas will undergo testing as per Section II.D. below.

D. Field Testing to Determine Presence or Absence of Archaeological Resources

In areas determined to have terrestrial, intertidal and underwater sensitivity, CTDOT, in consultation with CTSHPO and FTA, shall undertake field testing to identify the presence or absence of archaeological resources (Phase Phase IB) as follows:

1. Phase IB testing will begin with geoprobe, vibracore and hand-testing in terrestrial and intertidal areas already identified as sensitive in the Phase IA survey. This testing will rule out certain areas as too disturbed to contain intact archaeological deposits and will help guide development of a focused, more intensive Phase IB testing plan that will conclusively determine the presence or absence of archaeological resources. These determinations will be included in the Phase IB testing plan identified in section D.2.

2. Prior to intensive Phase IB field testing, CTDOT will submit a plan outlining the proposed methodology for CTSHPO's concurrence. The plan will likely include machine-stripping followed by manual shovel testing, expanded shovel testing in non-paved areas, and underwater archaeological investigation.

3. Subsequent to field testing in sensitive areas, CTDOT shall provide a technical memorandum to FTA, CTSHPO, and local stakeholders in which one of the following conclusions is reached:

a) The APE does not appear to contain potentially significant NRHP-eligible archaeological resources; or

b) The APE does contain potentially significant NRHP-eligible archaeological resources.

E. Field Testing to Determine Significance and Extent of Archaeological Resources

If Phase IB testing determines that potentially significant archaeological resources exist in areas that will be impacted by the Undertaking, Phase II field investigations shall be undertaken immediately in order to identify the physical extent of such resources and to determine their significance.

Subsequent to Phase II field testing in sensitive areas, CTDOT shall provide a combined Phase I/II survey technical report to FTA and CTSHPO in which one of the following conclusions is reached:

1. The APE contains significant NRHP-eligible archaeological resources; or
2. The APE does not contain significant NRHP-eligible archaeological resources.

F. Mitigation Data Recovery and Curation

If Phase II field testing determines that significant archaeological resources exist in areas that will be impacted by the Undertaking and that such impacts cannot be avoided, CTDOT, in consultation with FTA and CTSHPO, shall develop and implement appropriate measures to minimize and/or mitigate adverse effects on archaeological resources in the APE. These measures will be implemented prior to any construction or demolition of the area of significant archaeological resources.

1. CTDOT and FTA, in consultation with CTSHPO, shall consider measures, such as design modification, for avoidance of significant archaeological resources.

2. Should mitigation of an unavoidable archaeological site be required, stipulations may be amended to the MOA to address the mitigation, if deemed necessary by CTDOT and FTA in consultation with CTSHPO.

3. In advance of any mitigation or data recovery efforts undertaken for significant archaeological sites in the APE, CTDOT, in consultation with CTSHPO and in coordination with local stakeholders, will develop, in accordance with 36 CFR Part 79, an Analysis and Curation of Material and Records Plan for any archaeological excavations. CTDOT shall be responsible for the implementation of such plan.

MEMORANDUM OF AGREEMENT
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
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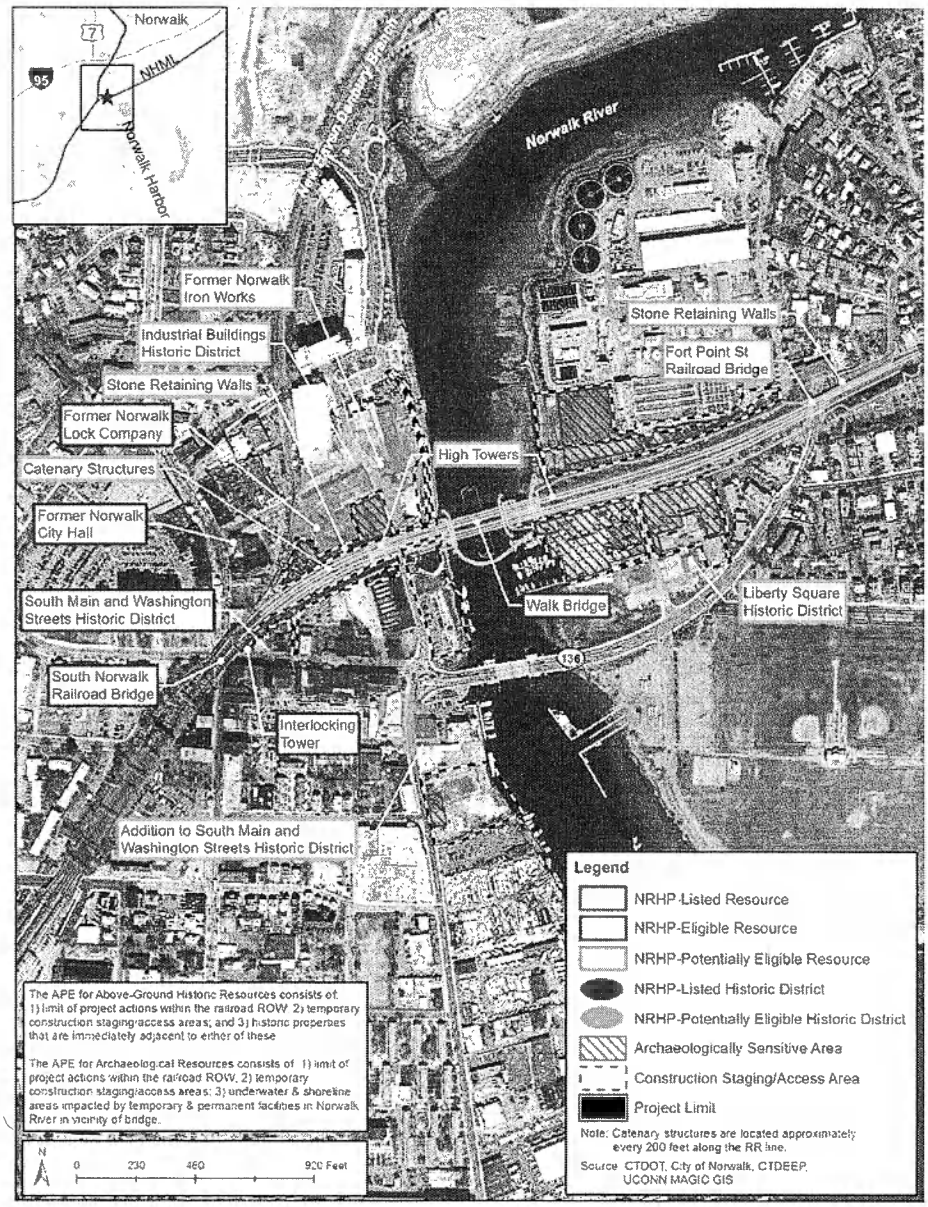
APPENDIX B:

Area of Potential Effect Map



MEMORANDUM OF AGREEMENT
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NORWALK, CONNECTICUT
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APPENDIX C:

Historic Properties Adversely Affected by the Undertaking

Property	National Register Status	Effects
Norwalk River Railroad Bridge (Walk Bridge)	Listed	To be replaced: Adverse Effect.
High Towers	Contributing to an eligible linear historic district	To be removed: Adverse Effect.
Catenary Support Structures	Contributing to an eligible linear historic district	Some or all of the existing catenary support structures will be removed: Adverse Effect.
Stone Retaining Walls	Contributing to an eligible linear historic district	To be removed: Adverse Effect.
Fort Point Street Railroad Bridge	Contributing to an eligible linear historic district	To be removed: Adverse Effect.
South Main and Washington Streets Historic District	Listed	Removal/replacement of bridge and high towers will have a visual impact on the district's setting: indirect (visual) Adverse Effect.
Industrial Buildings Historic District	Eligible	Removal of the high towers and removal and replacement of the Walk Bridge, catenary support structures, and stone retaining walls will have a visual impact on the setting of the potentially eligible historic district: Indirect (Visual) Adverse Effect.
Former Norwalk Lock Company, 18 Marshall St.	Eligible	Removal of the high towers and removal and replacement of the Walk Bridge, catenary support structures, and stone retaining walls will have a visual impact on the building's setting: Indirect (Visual) Adverse Effect.
Former Norwalk Iron Works (Maritime Aquarium), 10 North Water St.	Contributing to an eligible historic district	Removal of the high towers and removal and replacement of the Walk Bridge, catenary support structures, and stone retaining walls will have a visual impact on the building's setting: Indirect (Visual) Adverse Effect.

MEMORANDUM OF AGREEMENT
REGARDING THE
WALK BRIDGE REPLACEMENT PROJECT
NORWALK, CONNECTICUT
STATE PROJECT 301-176

APPENDIX D

INSTITUTIONS THAT MAY BE INTERESTED IN OBTAINING SALVAGED MATERIALS FROM THE WALK BRIDGE REPLACEMENT PROJECT

City of Norwalk
Norwalk City Hall
125 East Avenue
Norwalk, CT 06851-5125

SONO Switch Tower Museum
77 Washington Street
Norwalk, CT 06854

Norwalk Historical Society
Mill Hill Historic Park
2 East Wall Street, P. O. Box 1640
Norwalk, CT 06851

Lockwood-Mathews Mansion Museum
295 West Avenue
Norwalk, CT 06851

Maritime Aquarium at Norwalk
10 North Water Street
Norwalk, CT 06854

Connecticut Eastern Railway Museum
Eastern CT Chapter, National Railway
Historical Society
P.O. Box 665
Willimantic, CT 06226-0665

Connecticut Trolley Museum
P.O. Box 360
East Windsor, CT 06088

Danbury Railway Museum
120 White Street
Danbury, CT 06810

Railroad Museum of New England
P.O. Box400
Thomaston, CT 06787-0400

The Shoreline Trolley Museum
17 River Street
East Haven, CT 06512

The Valley Railroad Company
One Railroad Avenue
P.O. Box 452
Essex, CT 06426

Vernon Depot Park
Vernon Parks and Recreation Department
14 Park Place
Vernon, CT 06066