



Connecticut Department of

ENERGY &
ENVIRONMENTAL
PROTECTION

July 2, 2013

Benjamin Barnes; Secretary
Office of Policy and Management
450 Capital Avenue
Hartford, CT 06106

RE: Incidental Take Consultation for Igor I. Sikorsky Memorial Airport (BDR) Safety Improvements and Route 113 Realignment in Stratford, CT.

Dear Secretary Barnes:

In response to your letter of May 28, 2013 and in accordance with section 26-310(d) of the Connecticut General Statutes, I've attached the final "Basis for Determination for Taking" concerning the runway safety project at the Igor I. Sikorsky Memorial Airport being undertaken by the Connecticut Department of Transportation and the city of Bridgeport in Stratford, Connecticut. This project includes the realignment of State Route 113 and will result in unavoidable, direct and permanent impacts to two sub-populations of the State Endangered saltpond grass (*Leptochloa fusca* ssp. *fascicularis*).

This letter confirms that, after review of all documentation including a comprehensive mitigation plan, I have concluded that the project will not compromise the recovery of *Leptochloa fusca* ssp. *fascicularis*.

In keeping with your letter of May 28, 2013, please provide your office's findings as to whether the proposed actions 'would not appreciably reduce the likelihood of the survival or recovery of an endangered or threatened species,' but would result in the incidental taking of such species.

Once received, I will notify the project proponent of the determination.

Should you have any questions, please contact me at (860) 424-3005.

Sincerely,

Susan K. Whalen
Deputy Commissioner

Cc: Bill Hyatt
Rick Jacobson

Basis for Determination of Incidental Taking
Pursuant to C.G.S. Section 26-310(d)

Igor I. Sikorsky Memorial Airport; Stratford, Connecticut (2013)

1. Impact of the Incidental Taking on the Endangered Species

The Connecticut Department of Transportation (CTDOT) and the city of Bridgeport are currently undertaking a runway safety area project at Igor I. Sikorsky Memorial Airport (BDR) in Stratford, Connecticut. The project involves safety improvements to the runway safety area (RSA) and will include the installation of an Emergency Materials Arresting System (EMAS) at the north end of runway 6-24 to reduce the frequency and severity of aircraft incidents at the airport. This work will require the realignment of State Route 113 which will result in unavoidable, direct, permanent impacts to two sub-populations of the State endangered Saltpond grass (*Leptochloa fusca ssp. fascicularis*).

Additionally, a second State Endangered plant species; two plant species of State Special Concern; twenty-two bird species on the Connecticut list of endangered, threatened, or species of special concern; one moth species of special concern, and one tiger beetle species of special concern were located on airport property and documented in this and supporting technical reports. Through avoidance and best management practices, these species will not be permanently impacted by the proposed activities.

Saltpond grass is an annual grass species with a wide geographic distribution, though its populations are considered vulnerable or imperiled in seven states and the District of Columbia. *Leptochloa fusca ssp. fascicularis* was documented at BDR during biological surveys conducted at the airport in 2012. Currently, only three populations of *Leptochloa fusca ssp. fascicularis* have been documented within Connecticut, with the population at BDR being the largest.

The project is anticipated to impact approximately 46% of the airport's population of *Leptochloa fusca ssp. fascicularis*. Those plants growing alongside the existing roadway and within the path of the proposed realignment of Route 113 would be impacted by pavement milling, removal of the existing roadway, installation of a new culvert, and construction of a new sidewalk, bikeway, and the new roadway. Since the EMAS bed cannot be relocated, there is no feasible alternative to the proposed road realignment that would avoid impacts to *Leptochloa fusca ssp. fascicularis*. Other documented sub-populations of the species will not be impacted as they are located outside the project area.

CTDEEP by November of each year for five years following the completion of construction activities.

CTDEEP believes that the proposed mitigation has been planned to ensure the recovery of the *Leptochloa fusca* ssp. *fascicularis* sub-populations which will be impacted by the realignment of Route 113 in Stratford. In addition to carefully ordering the sequence of construction activities, the collection of seeds and the use of an appropriate substrate should enhance the survival and continued persistence of *Leptochloa fusca* ssp. *fascicularis* at the airport.

3. Terms and Conditions to Ensure Compliance

In order to ensure that all components of the proposed mitigation are addressed to the satisfaction of the Commissioner of Energy and Environmental Protection (Commissioner), all work shall be overseen by CTDOT's Office of Environmental Planning and CTDEEP staff.

Once construction of the project is complete, the CTDOT will transfer all permits to the City of Bridgeport for monitoring and maintenance responsibilities associated with said permits. The City of Bridgeport will allow CTDEEP access to the sites and will work with CTDEEP to ameliorate any problems found at the sites.

Failure to comply with conditions set forth in the "Incidental Take Report" or within this document may result in permit revocation and/or civil penalties levied against the responsible party. The "Incidental Take Report," prepared for the CTDOT by Fitzgerald & Halliday, Inc. of 72 Cedar Street in Hartford, CT, was submitted to Mr. Dimple Desai (Connecticut Office of Policy and Management) on May 17, 2013 by Mr. Nelson DeBarros (CTDEEP).