

BREWER STRATFORD MARINA

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The Honorable James M. Albis
Chairman
Environmental Committee
Senate Bill 78
February 19, 2016

Dear Representative Albis,

I am writing in regards to the proposed amendments for Section 1 Subsection (c) of section 22a-92 of the general statutes, Senate Bill 78, specifically those amendments concerning the “disposition of dredged materials from certain harbors and ports on Long Island Sound” (Raised Bill No. 78)a. As a state citizen of the Connecticut shoreline area, I greatly value this natural resource and applaud all efforts to maintain or improve the ecological structure. As a long-time partner with Brewer Yacht Yards, a marine based organization which owns and operates 26 marine facilities on the East Coast; I also understand the need for a symbiotic relationship between our commerce requirements and that of the environment.

Brewer Yacht Yards has eight marine facilities in Connecticut which employs over 250 Connecticut residents and provides recreational facilities and destinations for over 3,000 vessel owners and operators from a multitude of origins. It is standard practices with these marine facilities to adhere to environmental guidelines set forth by the CT DEEP. Additionally Brewer Yacht Yards was a forerunner at the dawn of the Clean Marina Program, a then voluntary program to comply with the strictest of guidelines to help preserve the waterfront ecosystem. This program is just one of many that assist in the preservation of the Long Island Sound. By maintaining and exceeding such expectations, our facilities are providing an economically and ecologically friendly experience for our customers and the native flora and fauna of our shorelines. In some instances, we are seeing a vast improvement of the ecological biomes regardless of the negative impacts that preceded our marinas.

In order to maintain this symbiotic relationship, it is sometimes necessary to dredge navigable areas. This dredging has been in practice for years and is only performed under strict regulation and supervision from the applicable Federal and State agencies (CT Deep, U.S Army Corps of Engineers, National Marine Fisheries, U.S. EPA). Amongst these regulations is thorough sediment, chemical, and biological testing to ensure deposits are not detrimental to relocation sites. Also relevant is the Army Corps of Engineers “Dredge Materials Management Plan” which was developed and completed in December 2015 from considerable research and supports open water disposal of dredged materials, “to help manage dredged materials in a cost-effective and environmentally acceptable manner” (Dredge Materials Management Plan 2015)b.



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It is understood that the objective of this bill is to enhance the water integrity of the Long Island Sound. With such systematic regulatory methods already being utilized to help reduce or eliminate unfavorable impacts to the environment however, it is not believed that Senate Bill No. 78 will provide any ecological benefits but may in fact create further state economic disturbances in the maritime community. Dredging costs and the financial obligation to perform the necessary tests to be authorized by State and Federal agencies for dredging is already a considerable one. These proposed regulations will markedly improve these costs or eliminate the potential for dredging. Consequentially, this “would allow sediments to continue to build in shoaled areas, decrease the water depth, reduce available subtidal habitat, and increase the potential for reducing deeper habitat areas thus excluding resident species.” (Housatonic River Federal Navigation Project Draft)c.

All of us in the shoreline community and in the maritime industry share apprehensions with this legislative action. I urge you to please consider this information and the potential negative impacts that would result from Senate Bill No. 78. Thank you for your time and consideration.

Respectfully,

Rod Swift

Works Cited:

- a. “Raised Bill No. 78.” Connecticut General Assembly. Environmental Committee, February Session 2016.
- b. “Final Dredged Material Management Plan and Final Programmatic Environmental Impact Statement.” U.S. Army Corps of Engineers, New England District. December 2015.
- c. “Housatonic River Federal Navigation Project, Environmental Assessment Finding of No Significant Impact, Section 404(b)(1) Evaluation, for Maintenance Dredging.” U.S. Army Corps of Engineers, New England District. June 2012.