



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

79 ELM STREET, HARTFORD, CT 06106-5127

To: Mark Alexander - Transportation Assistant Planning Director
DOT - Bureau of Policy & Planning, 2800 Berlin Turnpike, Newington

From: David J. Fox - Senior Environmental Analyst **Telephone:** 860-424-4111

Date: December 3, 2010 **E-Mail:** david.fox@ct.gov

Subject: Greater Bridgeport Transit Maintenance/Operations Facility

The Department of Environmental Protection has reviewed the Environmental Impact Evaluation prepared for expansion and improvements to the Greater Bridgeport Transit Authority's maintenance and administrative facility at 1 Cross Street in Bridgeport. Given the nature of the project, renovation within the confines of the existing facility, and the developed nature of project environs, potential adverse environmental impacts are limited, as noted on page ES-12. In addition, the document did incorporate our scoping comments regarding permit requirements for the renovated facility. The following limited commentary is submitted for your consideration.

The document indicates that the proposed expansion will be designed to achieve a silver LEED[®] rating. The project description also lists various sustainable design elements for the facility, including a green roof. As noted in our scoping comments, the Department endorses these measures. Although the requirements of section 16a-38k of the CGS do not apply since this is not a state facility, the Department appreciates the commitment of the Greater Bridgeport Transit Authority to achieve LEED[®] silver rating.

Page 31 lists eliminating any unnecessary idling to no more than 3 minutes as a proposed measure to mitigate construction impacts. Additionally, page 63 cites Section 22a-174 of the RCSA that limits the idling of mobile sources to 3 minutes. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.

The anti-idling regulations also apply to all motor vehicles, including the buses that will be utilizing the facility. The Department recommends the posting of signs to remind drivers of the three-minute idling limit. The regulations do allow exceptions when it is necessary to operate defrosting, heating or cooling equipment to ensure the safety or health of the driver or passengers and when the outdoor temperature is below twenty degrees Fahrenheit.

Page 63 states that contract specifications will contain provisions of DOT's diesel vehicle emissions control language requiring certain non-road construction equipment to be retrofitted with emission control devices. The use of newer equipment that meets EPA standards would

obviate the need for retrofits. The Department also recommends using newer on-road construction vehicles that meet EPA's latest emission standards or use of diesel oxidation catalysts/particulate filters and clean fuel for pre 2007-model year on-road vehicles typically used in construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites.

Thank you for the opportunity to review this project. If there are any questions regarding these comments, please contact me.

cc: Douglas C. Holcomb, GBT
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Robert Hannon, DEP/OPPD
Ellen Pierce, DEP/APSD