



April 23, 2014

Mark Alexander, Transportation Assistant Planning Director
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, Connecticut 06131

Re: Bus Storage and Maintenance Facility
Frost Bridge Road, Watertown
Scoping Comments

Dear Mr. Alexander:

The Department of Energy and Environmental Protection (DEEP) appreciates the opportunity to submit these scoping comments on the above-referenced project. From the information presented at the public informational/scoping meeting at Watertown High School on April 16, we realize that this project is well advanced in both design and in its schedule to be advertised for construction. Nonetheless, these comments are offered in the vein of traditional scoping comments which would be provided early in the project development process in preparation for a CEPA or NEPA document.

The proposed facility will provide for the indoor storage of 98 transit vehicles operated by North East Transportation under the banner of the Waterbury Division of CT Transit and will be located at a site which was formerly the Watertown Drive-in Theater. As such, the site is a level, formerly cleared one, previously developed along the north side of Frost Bridge Road and west of the Naugatuck River. This site is a very appropriate one for the proposed use given its proximity to both Route 8 and to Waterbury Road/Thomaston Avenue, the lack of adjoining residential properties or neighborhoods, and the abutting institutional uses of a manufacturing plant to the south, the Naugatuck Railroad and Route 8 to the west, and a construction and demolition waste processing plant under construction to the north.

DEEP is well aware of the need for this new bus storage and maintenance facility. North East Transportation has been operating out of the existing site in an former factory building since the early 1970s. The current facility offers very poor vehicle circulation, with the buses largely needing to be backed into their parking slots. The vast majority of North East's fleet of forty-plus paratransit vehicles are parked outdoors because there is no room for them within the current garage. The current facility is very inefficient operationally on both ends of the service day.

Site Description

The proposed bus facility site was previously the Watertown Drive-in Theater which closed over 30 years ago. Remnants of pavement, plantings, piping and of the theater access road can still be found on the site. Several areas of the property show evidence of dirt bike use, particularly in the sandy area in the center of the property. Most of the property, other than the riparian woodland, is covered in

herbaceous growth including goldenrod, beggar's lice, and several stands of Japanese knotweed. A few larger trees are found on the site, most notably 11 large Norway spruces (60-70' tall) in the median of the theater access drive. Considering the length of time that the property has been out of active use, a surprisingly small volume of trash and debris has collected on the site.

The uncleared eastern portion of the site consists of riparian forest along the Naugatuck River. The woodland includes several sycamores just north of Frost Bridge, red maple, yellow birch, paper birch, black birch, black locust, white pine and a scattering of cottonwood. Many of the trees directly along the riverbank have beaver damage on the landward (west) side.

Naugatuck River Greenway

The Naugatuck River Greenway is a State-designated greenway envisioned to run 44 miles from Derby to Torrington. The Greenway will run along the southern boundary of the bus facility site on the north side of Frost Bridge Road, then along the western side of the Naugatuck Railroad, just west of the ConnDOT site. Additionally, a spur trail of the Greenway has been proposed in the Regional Naugatuck River Greenway Routing Study to run directly along the west bank of the Naugatuck River from Frost Bridge Road along the eastern edge of the ConnDOT property and continuing along the eastern and northern flanks of the adjoining waste processing facility property north of the ConnDOT site. This spur trail would provide access to a scenic stretch of the Naugatuck River and, in contrast to the main artery of the Greenway, which would be separated from the Naugatuck River by the railroad for virtually all of its length in Watertown, this spur would provide direct river access.

The current design plans for the bus storage and maintenance facility incorporate a gravel access road and grading work for an unpaved, seven space parking lot for a trailhead facility for the Naugatuck River Greenway. As was explained at the April 16 informational/scoping meeting at Watertown High School, the Federal Transit Administration funding grant for the bus facility limits the scope of work that can be undertaken with this funding to work elements for the actual bus facility. We accept this explanation for the limited nature of the trailhead facilities shown in the current 90% stage design plans. We appreciate ConnDOT's support of the Naugatuck River Greenway plans for this area and the inclusion of the preliminary work on the trailhead facility. DEEP will work with ConnDOT and the towns of Watertown and Thomaston to identify sources of funding to construct the spur trail along the river and the work on the trailhead facility. In recognition of the fact that there will be no public access points to the Greenway between Frost Bridge Road and the Thomaston wastewater treatment plant due to the lack of any crossroads, we anticipate the trailhead at Frost Bridge Road to receive significant usage. Therefore, DEEP does request that the preliminary grading work for the trailhead parking area be expanded to accommodate 12 parking spaces to better handle the anticipated public demand even at this interim stage in trailhead development.

Natural Diversity Data Base

There are no Natural Diversity Data Base listings occurring on the proposed site. The closest listing occurs approximately one-half mile north of the subject property near the confluence of Nibbling Brook and the Naugatuck River where woodmint (*Blephilia hirsuta*), a State Species of Special Concern, was last reported in 1909. This species is listed as preferring 'moist woods and borders'. Because not only this proximal listing of woodmint but all listings for this species in Connecticut consist only of historic records, it is considered unlikely that the species occurs on the project site and no recommendation is made to survey the site for it.

Remediation Division Files

A check with the DEEP Remediation Division indicates no listing for any known soil or groundwater contamination issues on the property of the proposed bus facility. The site is not listed on the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) maintained by the U.S. EPA or the Connecticut Inventory of Hazardous Waste Disposal Sites or the Transfer List maintained by this department, nor is the site identified on the Remediation Division's case management system.

Floodplain Issues

The Flood Insurance Rate Maps of the Federal Emergency Management Agency indicate that the portions of the site immediately adjacent to the Naugatuck River lie within the river's 100-year flood zone, but that the portion of the property proposed for development is outside of the 100-year flood zone but within the 500-year flood zone. The proposed use would not constitute a critical activity pursuant to Connecticut General Statutes section 25-68b(4).

Though this reach of the Naugatuck River is a segment for which Stream Channel Encroachment Lines have been established pursuant to C.G.S. section 22a-342, the Stream Channel Encroachment Line Program was suspended by Public Act 13-205. Potential elements of this bus garage project which might have been subject to this program are no longer subject to regulation under this process.

Based on information presented at the April 16 public information/scoping meeting at Watertown High School, the diesel fuel storage tanks for bus fueling will be above ground tanks and will be elevated above the 500-year flood elevation. This placement of the fuel storage tanks above the 500-year flood elevation as well as the fact that the proposed site use is not defined as a 'critical activity' under C.G.S. section 25-68b(4) means that ConnDOT will not need to file a Section 25-68 Flood Management Certification.

Naugatuck River Water Quality

The surface water quality classification for the segment of the Naugatuck River adjacent to the proposed bus facility is Class B. As of the 2012 assessment, current water quality is supporting the Class B standard for recreational use but not for aquatic habitat. The cause of the impairment status for aquatic life is bacteria, specifically e. coli.

Electric Vehicle Charging Station(s)

DEEP's standard guidance toward furthering the use of alternate fuels for transportation purposes is to recommend that Level 1 electric vehicle charging stations (for lengths of stays of 8 hours or greater) be included at 3% of the parking spaces in the project design. Increasing the availability of public charging stations will facilitate the introduction of the electric vehicle technology into the state and serve to alleviate the present energy dependence on petroleum. As these comments are being typed, Connecticut now possesses 187 publically-accessible electric vehicle charging stations. Given that the proposed facility will be enclosed within a security fence and therefore not accessible to the general public, a maximum of two charging stations would be recommended, which would allow for both employee usage and perhaps pilot testing of one or more electric paratransit vehicles.

Landscaping Suggestion

As I mentioned to John Hanifin at the April 16 information meeting, the site boasts a stately line of eleven 60-70' Norway spruces along the median of the old drive-in theater entrance road. These trees are all in good health and would be an aesthetic asset to the new bus facility. ConnDOT's responses to the then DEP comments on the 1999 bus facility FONSI noted that "the spruces which line the former access roadway to the drive-in theater offer a striking contrast against the background of the more sparsely vegetated areas. Incorporation of the site's mature vegetation into the overall facility layout will be considered in the design phase of the project." This line of Norway spruces, which are mislabeled as pines on the Wendel civil drawings, lines up in an approximate sense with the new access road into the bus garage. It appears that the spruces closer to Frost Bridge Road do not conflict with the alignment of the new access road and would sit above, and at the edge of, the stormwater infiltration basin. Several others of this line of spruces could be retained along the edge of the new access road with slight tweaks of its alignment. These trees do represent a potential asset to the appearance of the new bus garage. The possibility of retaining at least some of them should be explored.

General Comments

As the design for the proposed facility is already at the 90% phase and with advertising for construction anticipated to occur this summer, the following DEEP general comments on relevant permit programs, design standards and construction practices are offered in an effort to assist your planning from this stage onward.

Low Impact Development Stormwater Practices

The Department strongly supports the use of low impact development (LID) practices such as water quality swales and rain gardens for infiltration of stormwater on site. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped together. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs, roads and parking lots),
- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- the use of vegetated roofs (green roofs) to reduce the runoff from buildings,
- incorporation of proper physical barriers or operational procedures to prevent release of pollutants from special activity areas (e.g. loading docks, maintenance and service areas, dumpsters),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and

- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

The effectiveness of various LID techniques that rely on infiltration depends on the soil types present at the site. According to the Natural Resources Conservation Service's Soil Web Survey (available on-line at: [Web Soil Survey](#)), the soils at the property consist of urban land. These soils are unrated in their suitability for various stormwater management practices. However, infiltration practices may be suitable at this site. Soil mapping consists of a minimum 3 acres map unit and soils may vary substantially within each mapping unit. Test pits should be dug in areas planned for infiltration practices to verify soil suitability and/or limitations. Planning should insure that areas to be used for infiltration are not compacted during the construction process by vehicles or machinery. The siting of areas for infiltration must also consider any existing soil or groundwater contamination. Even if infiltration is limited at a site, it is still possible to implement LID practices such as green roofs on buildings or the use of cisterns to capture and reuse rainwater.

Vehicle Service Floor Drains

Vehicle maintenance facilities, such as the maintenance facility and the bus wash at the bus garage, usually require floor drains for the collection of wastewater generated by vehicle drippage, floor washdown and the washing of vehicles or steam cleaning of engines. Such drains are not permitted unless adequate collection and/or treatment facilities are provided. Most interior floor drains are connected to the sanitary sewer, which requires a *General Permit for the Discharge of Vehicle Maintenance Wastewater* (DEP-PERD-GP-010) for the discharge of up to 15,000 gallons/day from the Permitting & Enforcement Division. For further information, contact the division at 860-424-3018. A fact sheet, the general permit, a guidance document and registration forms may be downloaded at: [Vehicle Maintenance GP](#). The treatment required for this type of discharge is achieved by routing the wastewater through an oil/grit separator tank. From information presented at the April 16 meeting, we understand that the floor drains at the bus garage will be routed through an oil/water separator and then discharged to the Watertown municipal sanitary sewers.

Permits for Discharge of Stormwater from Construction and Industrial Activities

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require a permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit.

The discharge of stormwater from certain industrial areas requires a permit pursuant to EPA regulations promulgated in November 1990. The Permitting & Enforcement Division issued a *General Permit for the Discharge of Stormwater Associated with Industrial Activity* (DEP-PERD-GP-014) that will cover these discharges. The industrial activities that require a permit are defined in the regulations

by Standard Industrial Classifications. Registration describing the facility and the stormwater discharge must be submitted to the Department at least 90 days prior to the initiation of the industrial activity. A stormwater pollution prevention plan, including measures such as a monitoring program, controls for outside storage of materials, spill control plan, maintenance and inspection, employee training and recordkeeping, must be prepared. For further information, contact the division at 860-424-3018. A copy of the general permit as well as registration forms may be downloaded at: [Industrial Stormwater GP](#).

Leadership in Energy and Environmental Design (LEED) Green Building Standards

Pursuant to section 16a-38k of the CGS, any new construction of a state facility that is projected to cost five million dollars or more, or renovation of a state facility that is projected to cost two million dollars or more must comply with sections 16a-38k-1 to 16a-38k-9 of the Regulations of Connecticut State Agencies. The regulations require that the facility design process identify and implement practical and measurable green building design, construction, operations and maintenance solutions. These regulations closely follow the silver building rating of the Leadership in Energy and Environmental Design's (LEED[®]) rating system for new commercial construction and major renovation projects, as established by the United States Green Building Council, and the two-globe rating in the Green Globes USA design program. Requirements include selecting strategies in various categories including energy efficiency and renewable energy; the indoor environment; water efficiency; recycling, reuse and sustainability; site selection and development and innovative operations. A guidebook, *Connecticut Building Standard Guidelines, Compliance Manual for High Performance Buildings*, is available on-line at: [Building Standard Guidelines](#)

Prohibition on Prolonged Idling of Construction Equipment

Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP 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.

Use of Low Emissions Construction Equipment

For large construction projects, the Department typically encourages the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

The Department also encourages the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation

catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Potential Stationary Source Air Permit

The facility's heating system, emergency generator or other fuel-burning equipment may require a stationary source permit from the Bureau of Air Management pursuant to section 22a-174-3a of the Regulations of Connecticut State Agencies. A permit would be required if the equipment could result in more than 15 tons per year in potential emissions of any air pollutant. For further information, contact the bureau at 860-424-4152.

Finally, the most trivial of corrections is offered as you proceed from the 90% plans to the final plans. The title blocks of the civil, architecture and landscaping plans have an incorrect zip code for Watertown. The plans show a zip code of 06787 for Frost Bridge Road, Watertown, which is actually the zip code for Thomaston. The correct zip code is 06795.

Thank you again for the opportunity to submit these comments. Best wishes to ConnDOT as you proceed with the development of this much needed and long overdue facility, and to North East Transportation as they make their transition to a new home.

Respectfully yours,



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Senior Environmental Analyst

CC: John Hanifin, ConnDOT

