UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE
REGIONAL ADMINISTRATOR

May 15, 2001

Edgar T. Hurle
Director of Environmental Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
P.O. Box 317546
Newington, CT 06131-7546

Re: New Britain-Hartford Busway Draft Environmental Impact Statement, New Britain-Hartford, Connecticut (EPA ERP Number FTA-B59001-CT)

Dear Mr. Hurle:

The Environmental Protection Agency-New England Region (EPA) has reviewed the Federal Highway Administration's (FHWA)/Connecticut Department of Transportation's (CTDOT) Draft Environmental Impact Statement (DEIS) for the construction of a transit busway between New Britain and Hartford, Connecticut. We submit the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

According to the DEIS, the proposed project is intended to address congestion on Interstate 84 and other parallel arterial roadways while also expanding alternative modes of transportation and interregional transit opportunities. The 9.4 mile busway would travel through the towns/cities of New Britain, Newington, West Hartford and Hartford along active and inactive rail corridors. The corridor would be open only to bus traffic and would include up to twelve busway stations featuring sheltered platforms and other amenities that would vary by location. Alternatives to the proposed project studied in the EIS include the No-Build Alternative, and Transportation Systems Management/Travel Demand Management (TSM/TDM). As you know, EPA participated in several advisory committee meetings during the development of the project where we expressed support for the busway concept as long as environmental and community issues could be addressed through project design and mitigation measures.

The current project is a testimony to the hard work of the FHWA/CTDOT project team to actively involve the public and other interested stakeholders in the busway design. The project is refreshing example of a transit project that will benefit local communities and the regional transportation network through reductions in automobile dependency and vehicle miles traveled (VMT). Both of these outcomes will clearly benefit air quality in the region. As with any project that reduces VMT, this project should result in a decrease in ozone precursor emissions.

The DEIS explains that nine critical intersections were analyzed for carbon monoxide, and all were shown to remain well below the National Ambient Air Quality Standard (NAAQS) with the implementation of this project. Furthermore, the proposed busway is included in the Statewide Transportation Improvement Program (STIP) that was recently found to conform by the Federal Highway Administration. All of these are positive outcomes.

According to the DEIS, the project will feature a number of measures to ensure that it is successful. These include making sure that:

- the busway is time-competitive with automobile travel in the corridor;
- buses are not subject to traffic congestion as they will run on an exclusive right of way;
- the system contains clean, safe, secure, and well-lighted station facilities;
- bus headways are kept around a few minutes, therefore keeping wait time to a minimum;
- Intelligent Transportation Systems (ITS) are employed to keep travelers consistently informed of the status of the next bus or other pertinent travel information.

We agree that these factors are critical to the success of the system and encourage CTDOT to pursue an active publicity campaign based on a detailed marketing plan. If the plan aggressively promotes the benefits of the busway, the project has the potential to become a model that the rest of New England and other areas of the country can follow to achieve their transit and air quality goals.

Along with our support come several suggestions for measures we believe can and should be pursued to improve the long-term environmental benefits of the project. First, we believe that it will be critical for FHWA/CTDOT to continue the extensive public outreach and education process set in motion during the development of the DEIS. Not only should this process continue throughout the balance of the environmental review process, it should extend through the construction and operation phases of the busway. We specifically encourage CTDOT to keep the communities aware of construction progress and specifically alert neighborhoods as to when they will be impacted by construction activity. This process should also include early communication/notification with the communities where there is the potential of encountering hazardous or contaminated material. To that end, CTDOT should consider enhancing standard CTDOT Environmental Compliance standards by working with the Connecticut Department of Public Health (CTDPH) and local health departments in the development of contaminant exposure mitigation procedures and the community communication strategy. A successful outreach and communications program will allow for community input that can help keep operation of the busway in line with the needs of the commuting public in an environmentally sensitive manner.

Our second recommendation deals with bus fuels and emissions. Concerns about the potential linkage between diesel emissions and asthma rates were a common theme we heard during project meetings from Environmental Justice communities in Hartford. As you are no doubt

aware, the City of Hartford has declared an asthma emergency. The DEIS indicates that CTDOT will deploy their existing diesel buses on the busway and explains that alternative fuel vehicles will be considered when new vehicles are purchased in the future. EPA strongly advocates the purchase of alternative fuel buses as new buses are purchased and the fleet is replaced. In the meantime, however, any diesel vehicles used on the busway, especially older ones, will emit relatively high levels of air pollution. Many of these emissions can be controlled with cost-effective retrofit pollution control equipment, and we believe this type of action should be part of the proposed project as it would clearly benefit the region. Retrofit control equipment includes either oxidation catalysts or particulate filters installed on the exhaust of the diesel engine. The equipment is designed to reduce particulate matter and hydrocarbon and carbon monoxide emissions. Funding for the retrofit control devices can occur as part of the STIP process which includes the Congestion Mitigation and Air Quality (CMAQ) Program.

The uncongested nature of the busway travel corridor is likely to attract a number of private buses. Because it is highly unlikely that any of these private buses operate on alternative fuels or feature emission retrofits we suggest that the CTDOT develop a strategy that provides economic and/or access incentives for buses with these pollution controls. Taking these actions would demonstrate a commitment to the region and the impacted environmental justice communities to minimize the emission impacts from the busway. Moreover, a successful program would not only directly benefit the adjacent busway corridor communities, but in turn would benefit the state at large when the buses operate beyond the limits of the busway. The FEIS should describe the details of any incentive program, or other measures that may make sense, and an analysis of the capital costs and air quality benefits of retrofits/alternative fuels when compared to the benefit of using the busway corridor.

EPA appreciates the discussion of bicycle and pedestrian travel (multi-use path) within the DEIS. We encourage CTDOT and FHWA to continue to make serious efforts to incorporate a multi-use pathway into the project now, during the project design phase, while interest in the busway is at a high level, rather than at a later date after final decisions are made that definitively allocate space within the busway right-of-way. At a minimum, the busway should be designed in a manner that does not prohibit future construction of a multi-use path.

In addition to our recommendation that more specific information be provided about outreach/communication, air quality controls and the multi-use pathway, we also believe the FEIS should more fully describe how storm water from project related impervious surfaces will be managed to prevent impacts to natural resources or already overburdened storm water infrastructure along the corridor.

EPA compliments CTDOT's and FHWA's efforts to develop a project that recognizes that transportation solutions must focus on increased reliance on transit measures to help reduce VMT's and to protect hard fought gains in regional air quality. We believe that a successful and environmentally acceptable busway can be developed, and that the potential for success increases substantially if CTDOT continues to work closely with all of the communities along the corridor.

EPA looks forward to continuing involvement in the review of the project prior to the completion of the NEPA process. Please contact us if we can provide any technical assistance with respect to emission retrofit technology.

For the reasons discussed above, EPA has rated this EIS "LO-1 Lack of Objections, Adequate" in accordance with EPA's national rating system, a description of which is enclosed with this letter. Please feel free to contact me or Timothy Timmermann of EPA's Office of Environmental Review at (617) 918-1025 if you wish to discuss these comments further.

Sincerely,

Ira Leighton
Acting Regional Administrator

Enclosure
cc:

Richard H. Doyle
Regional Administrator
Federal Transit Administration, Region 1
55 Broadway, Suite 920
Cambridge, MA 02142

EPA, Office of Federal Activities

Please note, signatures have been removed from this document.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes that draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.